Dear Mr Ford,

Runnymede Local Plan 2035 Issues, Options and Preferred Approaches Consultation (July 2016)


As you know, we are keen to work with you and other authorities to meet the identified development needs of our areas, ensuring that the best and most suitable sites are brought forward for development and that other cross-boundary and strategic planning matters are continuously addressed with the key principles of sustainable development at the forefront. In responding to this consultation we have therefore focused on those points where cross-boundary issues could arise and where we consider that further joint-working between our two authorities is required.

Please note we have not been able to review the entire supporting evidence base in detail. As such, further comments may be forthcoming on additional issues as the Runnymede Local Plan 2035 progresses.

Spatial Vision, Objectives and Strategy

As with many other local authorities we recognise the difficulties in delivering sustainable growth and the challenge of effectively balancing competing environmental, social and economic pressures. Officers have previously commented on the evidence base identifying the development needs of Runnymede Borough and the various opportunities and constraints that have been considered and identified in meeting them. The consultation document takes this work one step further, identifying the preferred spatial strategy having balanced these considerations.

16th August 2016
Whilst we are supportive of the pragmatic approach being undertaken by Runnymede Borough Council in seeking to meet their identified development needs, we do not necessarily consider it appropriate to comment on how best other Boroughs and Districts achieve this. Nevertheless we would like to emphasise one of the risks that has been identified when considering the various spatial strategy approaches available to Runnymede Borough Council namely, the Government’s duty to cooperate.

Runnymede Borough Council’s preferred spatial approach (SS3) states that any unmet housing need would be met by neighbouring Housing Market Areas (HMAs) following duty to cooperate discussions. You will be aware that Elmbridge Borough Council is undertaking a review of its Local Plan evidence base including assessments of the development needs of the Borough and the various opportunities and constraints identified in meeting them. Whilst not formally published, I can confirm that the significant development needs identified within the Borough and wider HMA when balanced against the absolute constraints to development and also giving consideration to Green Belt means that is highly improbable that we will meet our objectively assessed development needs. Elmbridge Borough Council will therefore not be able to accommodate any residual development needs from neighbouring authorities or HMAs.

**Housing**

The proactive approach to meeting the accommodation needs of specialist populations e.g. Gypsies, Travellers and Travelling Showpeople, is welcomed in preferred approach H4/03. At the duty to cooperate workshop hosted by Runnymede Borough Council on 22nd April 2016, concern was raised that the plan intended to have a criteria based policy for assessing applications as opposed to allocating sites. As discussed, and notwithstanding the significant political element that needs to be considered with this topic, we welcome this change in approach and consider this to be consistent with Government policy.

**Natural Environment**

The preferred spatial approach (SS3) identifies the risk of not being able to identify sufficient Suitable Alternative Natural Greenspace (SANG) for the level of development proposed in the longer term and that some Resultant Land Parcels (RLPs) may need to / be able to accommodate on-site SANG. As the detailed consideration of site specific allocations progress, and should Runnymede Borough Council find that the strategy of on-site provision is not feasible, Elmbridge Borough Council would welcome the opportunity to discuss SANG capacity and any potential available surplus within our Borough that could aid the delivery of neighbouring authorities’ development needs.

**Transport & Infrastructure**

The increased pressure of development on infrastructure provision and in particular on the strategic and local road network is a principal concern for the Borough Council and our residents. In terms of cross-boundary strategic issues between our two authorities, of particular concern is the A317 St. Peter’s Way roundabout junction with A318 Chertsey Road and A317 Woburn Hill which is a recognised ‘hot spot’. In light of these concerns we welcome the modelling work already undertaken as part of the Transport Impact Assessment (TIA) and the acknowledgement that individual development sites and / or allocations will likely impact on the transport and highway network.
The Council also strongly supports the preferred policy approach (T2/01) and will be particularly interested to see the detailed modelling for the proposed development sites / allocations and the comprehensive travel plans put forward for each including, the mitigation measures proposed to reduce impacts.

**Flooding**

We are encouraged that Runnymede Borough Council recognises the significant risk of fluvial flooding and is taking a proactive stance in its preferred policy approach (F1/F01). However, whilst the evidence acknowledges the potential of flooding from other sources this appears not to have been taken forward in some instances e.g. surface water and the approach to managing this and drainage on minor sites.

The Council is also concerned that emphasis has been placed on development within the flood plain (Flood Zone 3b) rather than development coming forward within areas of high and medium risk of flooding in regards to requiring the design of new development to be flood resistant. For example, preferred policy approach F1/B01 is equally applicable to sites within Flood Zone 2 and 3a as it is 3b. In regards to preferred policy approach F1/C01 - improving community resilience in the event of a flood, the Council considers that the preparation of flood plans should be a **requirement** of any forthcoming Flood Risk Assessment (FRA) rather than just being **encouraged**.

The pragmatic approach to the sequential test to sites within Flood Zones 2 and 3a is noted and we would be interested to see the response from the Environment Agency in regards to this issue.

I hope you find these comments useful in progressing work on the Local Plan.

Please do not hesitate to contact Mark Behrendt, Planning Policy Manager, if any of the points raised requires further explanation. Officers would be happy to meet with you to discuss our comments in more detail.

Yours sincerely,

Councillor Mrs. Karen Randolph
Portfolio Holder for Planning Services
Elmbridge Borough Council