

# **Community Planning Panel**

16/11/2022 6:00pm

## **Attendees:**

### **Runnymede Borough Council (RBC):**

Georgina Pacey (GP) (Local Plans Manager)

Stephanie Broadley (SB) (Senior Planning Policy Officer)

### **CPP Members:**

Englefield Green Neighbourhood Forum (EGNF)

Ottershaw & West Addlestone Residents Association (OWARA)

Egham Residents' Association (ERA)

Franklands Drive Residents Association (FDRA)

New Haw Residents Association (NHRA)

Friends of Hythe (FoH)

Thorpe Ward Residents' Association (TWRA)

Ottershaw Neighbourhood Forum (ONF)

The Chertsey Society (TCS)

Virginia Water Neighbourhood Forum (VWNF)

### **Apologies given by:**

Lyne Residents' Association (LRA)

Englefield Green Village Residents' Association (EGVRA)

Hurst Lane Residents Association (HLRA)

Stroude Residents Association (SRA)

St Johns Eco-Church (SJEC)

## **Local Plan Review update**

GP gave a presentation on the Local Plan Review (LPR).

### **Key issues involve:**

- Decision to pause Issues & Options stage made at 7<sup>th</sup> September Planning Committee
- More certainty needed from Government on planning reforms and any changes to standard method
- Risks associated with pausing – risk of more applications for speculative development on Green Belt land if current Local Plan becomes out of date and housing land becomes critically low
- Planning Committee in January 2023 to provide steer on how to proceed.

## Questions & Answers:

ONF: The levelling-up agenda contains an emphasis on bottom-up planning through e.g. neighbourhood planning and supporting evidence. Queried whether this would have a role to play in the LPR.

GP: To some extent this would depend on whether the Government continues to set very prescribed parameters for housing and economic needs assessment – currently, the standard methodology leaves limited scope for considering tailored, bottom-up evidence. Depending on planning reforms and the degree of flexibility given to Local Planning Authorities, there may be scope to draw on neighbourhood planning evidence in the LPR.

FoH: Queried when the new standard method guidance is due to be published, and whether it is likely that 2018-based projections will be used. This would make a huge difference to Runnymede's housing requirement.

GP: Outlined how a new NPPF prospective was expected in November, but timescales are now unknown. It is anticipated that the prospectus will provide details on what national development management policies could look like and further thinking on the use of a standard method. Agreed that 2018-based household projections would reduce the figure significantly, but it wouldn't deliver the Government's 300,000 housing units a year target which they remain committed to.

FoH: Queried how removing the Duty to Cooperate (DtC) would impact RBC.

GP: The DtC is still in force and Local Plans can still fail on the DtC test at Examination in Public. We are currently cooperating with Spelthorne on their Statement of Common Ground which sets out areas of agreement and disagreement on strategic matters.

FoH: Summarised how Spelthorne still intend to submit their Plan at the end of the month, despite many other Councils taking the decision to pause. Growth in Runnymede will add significantly to the population of Staines, and this has implications for infrastructure, including the bridge between Staines and Runnymede – believes we should have been more proactive in highlighting these concerns.

GP: Described how she believed directing development to town centres such as Staines and brownfield land was the right thing to do, before looking to Green Belt land to meet housing needs- this approach is in line with the NPPF. We are bound by Government policy – Green Belt land should be a last resort. Spelthorne's evidence has been closely assessed – the transport assessment does not indicate that there will be severe impacts on the road network; and that infrastructure requirements have been identified. Acknowledged that the ability of infrastructure to accommodate growth is a common problem, but we can only operate in the system we have been given and believe that Spelthorne's spatial development strategy is appropriate, given the constraints.

NHRA: Queried why the DtC was being abolished, given that cooperation should be maximised during plan-making.

GP: The Government wants to speed up plan-making from around 5-7 years to around a 30-month timeframe. Anticipates that there will still be a mechanism to ensure cooperation takes place and that this is evidenced (and it is natural to do so, given the extent of cross-boundary spatial matters that need to be addressed in a Local Plan). A new alignment test is being proposed by the Government. At the moment, if an Inspector finds that the duty has not been complied with at

examination stage, they cannot recommend the Plan is adopted and the examination would cease before the tests of soundness are even explored.

ERA: Expressed optimism that the levelling-up agenda provides an opportunity to reassess the standard method. A lower housing requirement would be very helpful to relieve the Green Belt of further development. Identified that Mole Valley and Elmbridge were facing challenges in adopting their Local Plans and meeting housing needs.

GP: Confirmed that both Mole Valley and Elmbridge's proposed spatial development strategy would leave unmet needs, and it would be interesting to see how their Plans progress. Runnymede are in a fortunate position that we have a recently adopted Local Plan and we can afford to pause to see what steer we get from Government and to see how these examinations progress.

ERA: Requested further details about the Green Belt Review (GBR) work highlighted in the written updates.

GP: Described how we needed to look strategically at the wider Metropolitan Green Belt, and how it has changed over time, in accordance with 2030 Local Plan Inspector's expectations. An Inspector at a LPR examination would expect to see how this work has informed the revised spatial development strategy. New sites in the Green Belt have also been submitted as part of the latest Strategic Land Availability Assessment (SLAA), and we will need to consider these sites in a similar way to our previous GBR for completeness. However, the reassessment of additional sites has been paused pending further information and certainty from the Government (as discussed above).

### **Sustainable Places Part 2 Presentation**

GP gave a presentation on the Sustainable Places Part 2 work.

#### **Key points made:**

- SCC undertook work to assess sites against their 20 minute (walkable) neighbourhood concept and 40 minute (cyclable) neighbourhood.
- Aims to assess whether key amenities can be easily reached on foot/cycle/public transport, in accordance with principles in Local Transport Plan 4 (LTP4) – which sets new direction of travel.
- Helps identify where infrastructure improvements/mitigation may be required to improve accessibility.
- Part 3 will draw rounded conclusions on most suitable sites for allocation - findings from Sustainable Places Part 2 will inform wider site selection for the LPR, weighed with other key considerations on overall sustainability.

GP: confirmed slides would be circulated with Minutes [**ACTION SB**]

TWRA: Queried with the Local Cycling and Walking Infrastructure Plan (LCWIP) findings had been taken into account.

GP: Not at this stage – the assessment assumes no mitigation/interventions or infrastructure improvements i.e. it analyses the situation on the ground now.

TWRA: Conveyed concerns about the underlying assumptions made in the LCWIP and how public transport network/facilities accessibility and travel times were not a true reflection of reality, particularly for more rural parts of the Borough. The existing public transport service provision wouldn't fit with SCC's model – it does not currently represent a sustainable solution for travel.

GP: Confirmed that this was one reason why SCC had focused on propensity to walk, recognising that cycle and public transport infrastructure present more issues (frequency or service for public transport and quality of cycling infrastructure) and that generally, walking is the most accessible option for the majority of people.

TWRA: Pointed out that in urban areas walking may be feasible, but not in more rural areas. Key is to make car travel less attractive by improving public transport.

GP: Agreed that there were limitations, and when it came to wider site selection a more holistic approach would be adopted. Need to determine how investment in infrastructure could make sites more sustainable, and the next stage of the work would account for potential mitigation measures such as improving bus provision.

ERA: Attended the Surrey Developer Forum and although there were signals that developers recognised green agenda, there is little evidence that things are being done differently. Concerned that Surrey Place Ambition identifies Egham as one of nine primary urban centres, where more development will potentially be directed. This would not be sustainable given its relatively small size.

GP: Confirmed that she would request further details from Rachel Raynaud, who worked with SCC on the Place Ambition and would be more familiar with how Egham was identified as a primary urban centre [**ACTION GP**].

VWNF: Expressed concern that RBC is not taking sufficient account of SCC's views on the sustainability of proposals in Virginia Water. An opportunity to improve public transport and provide safer, attractive active travel infrastructure and access as part of a recent proposal considered at Planning Committee was missed. There is insufficient familiarity with the local road network and the infrastructure enhancements that are necessary to accommodate growth in the area. Original objectives for infrastructure delivery are not materialising to meet the needs of the existing and new communities. Believes SCC are not taking into account the cumulative impact of proposals – particularly where strategic sites are divided up into smaller parcels, causing disconnection between phases of construction and the design of infrastructure across the wider site. To summarise, there needs to be greater partnership working between RBC and SCC.

GP: Emphasised that if SCC raised an objection based on insufficient transport infrastructure, then RBC Case Officers would hold their views in high esteem. Any infrastructure requirements identified by SCC, as Highways Authority, are taken into account. GP would relay these concerns to the Development Management team [**ACTION GP**].

FoH: Also concerned that developers are parcelling up land, where individually, impacts on the local transport network are not as severe. Such piecemeal development should not be supported.

GP: Confirmed that this issue would be given greater consideration in the LPR. Agreed that developers should be directed to think holistically about strategic infrastructure provision.

### **Infrastructure Delivery Schedules (IDS) Presentation**

#### Key points made:

- RBC are preparing a CIL Governance framework.
- The IDS identifies infrastructure requirements, costs, funding sources and delivery partners to deliver the planned level of growth in the Local Plan.
- Needs to be periodically updated to account for policy changes, changing priorities, changing costs etc.

- Updated IDS will support the implementation of CIL – likely to be in place by Spring 2023.
- Local communities also need to consider CIL spending criteria and identify relevant projects to accommodate planned growth.
- Consultation on IDS update planned to take place December-January.

ONF: Described how identifying infrastructure needs across long time horizons is challenging, and relies on loose assumptions. Particularly for education and healthcare infrastructure, where catchments do not align with Neighbourhood Area. Has engaged with SCC but School Organisation Plan likely to extend to only 2031/32, which is unhelpful for planning to 2040 and beyond.

SB: Agreed. Planning for infrastructure is complex and infrastructure providers do not often plan to same timescales as strategic Local Plans. Assumptions do need to be made, drawing on information such as SCC's Developer Contribution Guide (which provides some assumptions around how increased population from housing growth will impact infrastructure). Surrey Heartlands has developed a model to help determine how growth will create a need for new primary and secondary healthcare as well as mental health facilities, but it is applied at a Borough-wide scale. Difficult to plan for infrastructure at a neighbourhood scale due to wider catchments involved in delivering infrastructure – it is perhaps best conducted at a more strategic scale.

FoH: Raised concerns about flood defence infrastructure, and queried how removing one 'leg' of the River Thames Scheme (RTS) would impact flood risk. More land is likely to be defined as functional floodplain, and the effects of climate change need to be factored in. With groundwater levels rising, a lack of compensation areas and ongoing permitted development, people are being put at ever-greater levels of risk.

GP: Confirmed that the Council is waiting to see the Environment Agency's (EA's) latest modelling to understand the impacts of the revised RTS scheme. Offered to query with Marcel Steward who is the RBC lead for the RTS whether he has had insight of any studies [**ACTION GP**]. A meeting with the EA would take place on 30 November to understand the latest position. Their latest modelling would also be essential in updating the Strategic Flood Risk Assessment which supports the LPR. GP would enquire when EA's modelling would be made publicly available, and also whether any other modelling updates in the Borough were proposed in the short term (query made in relation to the Rive Ditch in particular) [**ACTION GP**]. GP would also be querying whether latest EA modelling took account of the updated definition of the functional floodplain.

FoH: Explained how flood risk in Thorpe is being exacerbated by permitted development being built with no flood mitigation measures. Identified a lack of regulation. Also exacerbated by increased development identified for Staines, which would displace water elsewhere. The impacts of growth on flood risk and groundwater levels need to be examined at much wider geographies. Expressed disappointment that the EA did not run a consultation event in Thorpe. Much more transparency is required.

GP: Hopeful that the RTS would alleviate some of the issues. Confident that Spelthorne would have scrutinised the effects of planned growth on flood risk. Spelthorne BC will be working closely with EA and they will need to defend their views at examination.

FoH: Raised the possibility of issuing an Article 4 Direction in Thorpe. Described how they had updated their data and would send evidence to GP for further consideration [**ACTION FoH**].

NHRA: Expressed concerns about a development proposal in Byfleet – believed flood risk had been insufficiently assessed, and new national policy and guidance had not been taken into account. Emphasised how SFRA should consider the risks from Rive Ditch.

GP: Confirmed that the SFRA would be borough-wide – EA’s new modelling would be key to this work.

ERA: Also expressed concern that part of the RTS had been abandoned without any modelling to determine what the implications of this would be.

GP: Emphasised that she would explore with the EA what modelling had been done; when it would be made available; and identify any other modelling in the pipeline.

#### **Q and A on the written update**

GP: The discussion had already addressed some issues relating to the written updates. Invited the members to email the planning policy team with any further comments.

#### **AOB**

Next meeting likely to be in February 2023. A proposed date would be circulated soon.

Meeting finished at 8:15pm.