

RESPONSE TO MATTER 5

REPRESENTOR ID 1998

**HEARING STATEMENT
ON BEHALF OF WENTWORTH
RESIDENTS ASSOCIATION**


**RUNNYMEDE 2030
LOCAL PLAN EXAMINATION:
STAGE 2 HEARINGS**

JANUARY 2019

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Title: Hearing Statement Matter 5
Project: Runnymede 2030 Local Plan Examination
Client: Wentworth Residents Association
Issue: Final
Project No: 17134

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Introduction

- 1) This Hearing Statement has been produced by ShrimplinBrown on behalf of the Wentworth Residents Association ("WRA") (representor ID 1998) in relation to the examination into the Runnymede Borough Local Plan 2030 ("the draft Local Plan"). It responds to Matter 5 of the Stage 2 Hearing Sessions.
- 2) As made clear in previous objections to the Local Plan, the WRA wishes to participate at the hearing sessions where this Matter will be considered by the Inspector.
- 3) The WRA represents the residents living on the Wentworth Estate (being over 1,000 households) and business interests in Virginia Water in all matters affecting the Estate.
- 4) The WRA objects to the draft Local Plan, specifically: the failure by the Council properly to discharge its duty to co-operate; the failure by the Council properly to undertake a sustainability appraisal (and related processes) into the draft Local Plan; and three proposed housing allocations which it considers should be deleted from the emerging Local Plan:
 - Policy SD20: Longcross Garden Village;
 - Policy SL9: Housing Allocation at Virginia Water North; and
 - Policy SL10: Housing Allocation at Virginia Water South.

Matter 5: Longcross Garden Village (Policies SD3, SD10 and supporting text)

5.1 Overall, is the geographical extent of the proposed allocation and quantity of development justified? Is it based on a clear, robust, consistently applied site selection process, properly informed by the Green Belt review, sustainability appraisal and habitats regulations assessment? Are there exceptional circumstances that are sufficient to justify the proposed alterations to the Green Belt boundary?

- 1) As made clear during the Stage 1 Hearing Sessions, the Green Belt Review methodology is fundamentally flawed as it excluded Longcross from the assessment, thus in effect predetermining the outcome of the Review.
- 2) The methodology for the Green Belt Review Part 2 (March 2017) says that in terms of Green Belt Purpose 2, to prevent Neighbouring towns from merging, the “Settlements” include Virginia Water and Longcross. However, the accompanying map (Figure 2.3) does not given an outline for Longcross, as it does for other Settlements. The detailed assessment of Sub Area 52, Virginia Water South, makes no mention whatsoever of Longcross, either in its existing form or as proposed to be allocated. The Review’s conclusion that Sub Area 52 does not perform any role in preventing neighbouring towns from merging, scoring zero out of five in this respect, is thus clearly flawed and cannot be given any weight in decision making.
- 3) Nor is there any meaningful assessment about whether a sustainable settlement could in fact be created, by reference to (in each case) reasonable alternatives (both within and beyond the Borough). The Runnymede Infrastructure Needs Assessment: Stage 1A and 1B Report (April 2017) only assesses the needs generated by the site (Chapter 25). However, there is no assessment of the existing services.
- 4) The site faces fundamental problems, none of which have been properly tested by the Council, including: it is not of a size large enough to support the services necessary to become a sustainable settlement; it is severed by the M3, which is an

extremely busy public highway; its location close to the M3 raises significant concerns about air quality, noise and health/amenity; it is within the 400m buffer of a SANG; it is inaccessible by public transport (a failure not resolved by the location of a small and infrequently used Longcross train station and references to station improvements being nothing more than aspirational); and its delivery would be subject to significant up-front infrastructure costs.

5.2 Is the expected rate of housing completions within 5 years of the adoption of the Plan (740 dwellings, 2019/20-2023/24 (SD_023G, July 2018)) and the target of at least 1700 completions by 2030 justified by robust evidence, including progress to date on master planning, outline and full planning permissions, and market evidence of achievability and deliverability? Have any potential barriers to delivery been identified? Is there sufficient flexibility to address them?

- 5) There are a number of barriers to delivery of the site including resolution of strategic highways matters, contamination remediation (very common in ex-military facilities) and improvements to infrastructure, including to Longcross Train Station (see detailed commentary below) and provision of general community facilities. These will all take time to resolve. The anticipated speed of delivery is therefore wildly exaggerated.
- 6) The time it has taken DERA North, part of the proposed Longcross allocation, to come forwards indicate how slow development can be to progress.¹ Clearly each site and proposal will be determined on its own merits but the direct experience on this site is that development will take a long time to come forwards.

¹ An outline planning application was made in 2005 but outline planning permission was not granted until 6 June 2011 (RU.05/0538). In 2012 the applicant reviewed these plans with pre-application discussions and individual meetings with stakeholder groups and statutory consultees beginning in 22 September 2011 leading to a planning application validated on 31 October 2012 but later withdrawn on 22 July 2013 (RU.12/1120). A hybrid application was then made which was validated on 25 November 2013 and granted permission on 12 August 2014 (RU.13/0856).

5.3 Are the detailed requirements of Policy SD10 justified and deliverable? Do they strike the right balance between specificity and flexibility as appropriate? In particular:

- a) Do they provide a clear, achievable policy framework to help deliver a high quality, distinctive garden village?**
- b) Is the mix of uses, including employment and local facilities and services, justified and deliverable at the right time?**
- c) Does the evidence justify the proposals for a range of residential accommodation, including the percentage of housing that is affordable, and are there reasonable prospects that it will be delivered over the Plan period? What number of outlets is currently proposed?**
- d) Can further detail be provided about how and when the policy requirement for Gypsy and Traveller accommodation will be met? Should provision be made for more than 10 pitches, given the potential level of unmet need in the Borough?**
- e) With regard to criterion e) of Policy SD10, are the requirements sufficient to provide for sustainable transport choices, and are they realistic and achievable over the Plan period? Can there be reasonable confidence that criterion h), including the Council's proposed minor modification 44 (CD_001A), will be effective in this regard?**
- f) Based on the Plan's requirements, will the proposed development provide satisfactorily for the protection and enhancement of the natural environment, especially in regard to the SPA and SAC?**
- g) Are the proposals viable?**

5.4 Overall, do the Plan's proposals for Longcross Garden Village align with the key principles that guided its identification as a Locally-Led Garden Village by the Government in 2017? Are they an appropriate reflection of the TCPA's principles as set out in paragraph 5.90 of the Plan?

- 7) We remain concerned about the failure to properly assess air and noise impacts across the Borough and for Longcross in particular (see our previous representations and Matter 3 Hearing Statement, paragraphs 16 and 17).
- 8) We remain concerned about the viability of the development and its ability to fund the necessary infrastructure to make it viable. In particular we are concerned about the ability to deliver improvements to the rail services which are vastly expensive and complicated to deliver but are fundamental to the sustainability of the proposal. This line is already nearing capacity, and this after platform and train carriage extensions. Network rail's report and accounts highlight the poor quality of the line. It is currently 10 years past its design life and there is no money to make the improvements even in the next funding period for rail starting 2019. This means the line is being patched and will be for a number of years.
- 9) Longcross Station is more of a halt than a station. It has a short platform. Apart from two shelters on the platform, there are no station buildings or facilities. There is no vehicular access to it or near it. The only access to it is down a 350m long pedestrian walkway. It is hidden away to the extent that it is difficult to actually find. The station is on the very edge of the Longcross, distant from the vast majority of development.
- 10) The masterplan for Longcross shows a new car park and what we presume is a new station building, but this falls within land that is currently Longcross Studios which we understand is subject to long leases and so there is no guarantee of delivery. The proposals to improve it are ill defined and vague.

Appendix 1

Longcross to London Waterloo

Monday to Friday

SW	SW	SW	SW	SW	SW	SW	SW	SW
0705	0735	0816	0846	0916	1016	1316	1616	1716
0759	0829	0906	0934	1004	1104	1404	1704	1806
SW	SW	SW	SW	SW	SW			
1816	1846	1916	1946	2016	2046			
1904	1937	2004	2034	2104	2134			

London Waterloo to Longcross

Monday to Friday

SW	SW	SW	SW	SW	SW	SW	SW	SW
0550	0620	0650	0720	0750	0807	1250	1520	1605
0635	0705	0735	0805	0835	0854	1335	1605	1653
SW	SW	SW	SW					
1635	1720	1750	1820					
1723	1805	1835	1905					

Longcross to Reading

Monday to Friday

SW	SW	SW	SW	SW	SW	SW	SW	SW
0635	0705	0735	0805	0835	0854	1335	1605	1653
0710	0743	0812	0843	0912	0930	1412	1642	1728
SW	SW	SW	SW					
1723	1805	1835	1905					
1801	1842	1912	1947					

Reading to Longcross

Monday to Friday

SW	SW	SW	SW	SW	SW	SW	SW	SW
0742	0812	0842	0942	1242	1542	1642	1742	1812
0816	0846	0916	1016	1316	1616	1716	1816	1846
SW	SW	SW	SW					
1842	1912	1942	2012					
1916	1946	2016	2046					