

**RUNNYMEDE BOROUGH COUNCIL
INTERNAL MEMORANDUM
CONSULTATION ON PLANNING APPLICATION**

My Ref: RU.22/0454 Date: 22/08/2022
From: [REDACTED] To: RecipientName

Proposal: Hybrid planning application comprising: (a) Full planning application for the demolition of existing buildings, provision of 2 x replacement garages for 155 and 157 Brox Road and delivery of a residential development (Use Class C3) comprising 186 dwellings (including 35% affordable housing) and 2 Gypsy and Traveller Pitches, informal and formal open space, footpaths, cycleways and internal roads, landscaping, planting and drainage infrastructure. Creation of new vehicular and pedestrian access into the site from Brox Road; and (b) Outline planning permission for: The use of 0.1 ha of land for the provision of a GP Surgery of up to 800sqm (Use Class E) with associated parking and landscaping.

Location: Land to the east of Brox Road Brox Road Ottershaw KT16 0LQ

PLEASE RESPOND WITHIN 14 DAYS

You are notified that the above application has been received and the relevant plans and documents can be viewed on the Council's website under the above reference. You are being formally consulted so that your comments can be taken into account when the application is determined and to support any appeal against a refusal. To assist, please complete the form below by deleting any statements that are not relevant, and adding any additional comments. You are advised that your comments will be published directly to the Council's website.

Please email the completed form to planning@runnymede.gov.uk within 14 days of the date of this consultation even if it is to confirm **NO OBJECTIONS**. In the absence of a reply within this period, it will be assumed that you have no objections. Please contact the case officer for further information should you require assistance.

No objection subject to conditions/obligations	Please see comments below.						
<p>Comments:</p> <p>Particularly relevant policies: At the current time, the development plan for Runnymede consists of the 2030 Local Plan, the policies within the waste and minerals plans produced by Surrey County Council and policy NRM6 from the South East Plan.</p> <p>The adopted Infrastructure Delivery & Prioritisation SPD, Green & Blue Infrastructure SPD, Design SPD and Thames Basin Heaths SPA SPD are also material considerations.</p> <p>The Runnymede 2030 Local Plan policies which are considered relevant to this application are listed in the table below.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: black; color: white;"> <th style="text-align: left; padding: 5px;">Relevant Plan</th> <th style="text-align: left; padding: 5px;">Policies</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">National</td> <td style="padding: 5px;"></td> </tr> <tr> <td style="padding: 5px;">NPPF 2021</td> <td style="padding: 5px;"></td> </tr> </tbody> </table>		Relevant Plan	Policies	National		NPPF 2021	
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National							
NPPF 2021							

Regional	
South East Plan	NRM6 – Thames Basin Heaths
Local	
Runnymede 2030 Local Plan	SD1 – Spatial Development Strategy
	SD2 – Site Allocations
	SD3 – Active & Sustainable Travel
	SD4 – Highway Design Considerations
	SD5 – Infrastructure Provision & Timing
	SD7 – Sustainable Design
	SD8 – Renewable & Low Carbon Energy
	SL1 – Health & Wellbeing
	SL12 – Housing Allocation at Ottershaw East
	SL19 – Housing Mix & Size Requirements
	SL20 – Affordable Housing
	SL22 – Meeting the Needs of Gypsies, Travellers & Travelling Showpeople
	SL24 – Self & Custom Build Housing
	SL26 – New Open Space
	EE1 – Townscape & Landscape Quality
	EE2 – Environmental Protection
	EE9 – Biodiversity, Geodiversity & Nature Conservation
	EE10 – Thames Basin Heaths SPA
	EE11 – Green Infrastructure
	EE12 – Blue Infrastructure
	EE13 - Flooding
Other	
Thames Basin Heaths SPA SPD	
Green & Blue Infrastructure SPD	
Infrastructure Delivery & Prioritisation SPD	
Design SPD	

Please note that the list is not exhaustive and seeks to pick out the key policies only. It should also be noted that the Runnymede 2030 Local Plan needs to be read as a whole.

Policy Observations

These observations are focussed on the requirements of Policy SL12 of the 2030 Local Plan, open space and housing mix. They do not cover detailed issues of design. These comments should be considered alongside those made for application RU.22/0479.

Policy SL12 requirements

Criteria a) of Policy SL12 seeks a minimum of 200 dwellings + 2 Traveller pitches. The application proposes 186 dwellings + 2 Traveller pitches, but does not include the part of the allocation site at the Field Nursery. Whilst what is proposed is below the minimum requirement it would appear necessary to incorporate additional requirements for green space (Local Areas of Play) and the shortfall could be made up at the Field Nursery. As such, no policy objection is raised against criteria a) of Policy SL12.

Criteria b) Comments from the Countryside Access Officer at SCC are noted and Planning policy would defer to these comments.

Criteria c) Take account of site boundary vegetation, adjacent ancient woodland and its buffer zone, unit SS4 of the Surrey Landscape Character Assessment in design and layout. Provide new boundary planting with native species. The GBI checklist submitted with the application identifies that the site layout and planting plan have been designed based on ecological considerations to ensure retention and protection of the most important ecological features, namely boundary hedgerows and woodland. The soft landscaping plans show a planting strip and buffer along the northern boundary of the site with the Meath School, hedgerow and tree planting along the boundaries of properties at Brox Road & Southwood Road and buffer along the boundary with the public footpath/watercourse to the east with meadow planting. As such, it would appear that regard has been had to boundary vegetation and buffer zones which is confirmed in the Design & Access Statement. A landscape and visual appraisal has also been submitted which takes account of the Surrey Landscape Character Assessment. The proposals for soft landscaping can be secured by condition.

Criteria d) Planning Policy would defer to any comments made by the CHA & National Highways. In relation to a contribution to A320 mitigation, this should be secured through S106 and an amount in line with the Infrastructure Delivery & Prioritisation SPD (paras 3.35 & 3.36).

Criteria e) Planning Policy would defer to any comments made by SCC Education. If a financial contribution is required this should be secured through CIL.

Criteria f) Requires the provision of 0.1ha of land and proportionate contribution to the building of up to 800sqm for a new health facility. The proportionate contribution can be secured through CIL. The provision of land at 0.1ha is dealt with in outline as part of this hybrid application. The area of land reserved for the health facility is shown on the detailed site plans and indicated in the Planning Statement (p28). In this respect the provision of land for the health facility should be secured by planning obligation and ringfenced for this use, although this may need to be time limited.

Criteria g) Requires appropriate flood risk mitigation and SuDS. Planning Policy would defer to comments by the Environment Agency, Lead Local Flood Authority and RBC drainage officer in this respect.

Criteria h) Provides for net gains in biodiversity. A BNG assessment and Ecological Impact Assessment have been submitted with the application and the case officer is requested to consult with Surrey Wildlife Trust/Surrey Nature Partnership in this respect. The BNG assessment concludes that there will be a 24.65% habitat unit net gain, 118.88% hedgerow unit net gain and 104.76% river unit net gain. As such, it would appear that the development will provide for BNG on site and any proposals to achieve this should be secured by condition. Appendix 7 of the Ecological Assessment also sets out an Ecological Enhancement Plan. Again, this should be secured by condition. The BNG and ecological enhancements are generally in

line with the GBI SPD.

Criteria i) Provision or contribution towards other infrastructure identified at application stage. Any contributions towards off-site infrastructure would be covered by CIL.

Criteria j) Provide an area of SANG and contribution towards SAMM. For provision of SANG please see comments for application RU.22/0479. A contribution toward SAMM should be secured through S106.

Open Space Requirements

Policy SL12 of the 2030 Local Plan does not set out the open space requirements for the site (other than SANG), relying on Policy SL26 for the quantity and type of provision instead. This requires 1.6ha per 1,000 population for outdoor sports, 0.8ha per 1,000 population for children/teenagers and 20 allotment plots per 1,000 households.

The Infrastructure Delivery & Prioritisation SPD only requires a contribution towards open space from market housing. Population yield from market housing, based on the mix proposed is 311.45. This gives a requirement for:

Outdoor sports – 0.5ha

Playspace – 0.25ha (0.08ha equipped, 0.17ha unequipped)

Allotments – 3.72

Fields in Trust (FIT) Guidance: Beyond the Six Acre Standard states that developments of 1-200 dwellings should contain a LEAP & LAP (Local Area of Play) with a contribution toward a MUGA (Multi Use Games Area). Comments on the LEAP, unequipped playspace, outdoor sports and allotments are set out in the Policy observations on application RU.22/0479 and a contribution towards a MUGA can be secured through CIL.

In terms of provision of LAPs, two are proposed on the RU.22/0454 site. The FIT guidance states that LAPs should have a minimum area of 100sqm and have a maximum walking distance of 100m. The Design & Access Statement identifies LAP2 as being 145sqm in area, although no area measurement is given for LAP1. Provided both LAPs are at least 100sqm each, these will be acceptable in terms of size. The majority of proposed residential units appear to be within 100m of either one of the LAPs and this is considered to be acceptable. The overall design of LAPs should be agreed with the Council's Greenspaces Team and delivery secured through S106.

Housing Mix

Policy requires housing mix generally in line with the Strategic Housing Market Assessment (SHMA) and Policy SL20 states that 35% of units should be affordable. Since the adoption of Policy SL20, government has introduced its First Homes policy and to take account of this, Runnymede has published a 'First Homes Interim Policy Statement' (Jan 2022) which changes required affordable tenure mix to 25% First Homes, 53% Social/Affordable and 22% Other forms of affordable. The application proposes 186 units of which 65 would be affordable which meets Policy SL20 requirement of 35%. The affordable housing statement indicates these would be 52.3% as affordable rent, 24.6% as First Homes and 23.1% as shared ownership. This housing mix is therefore generally in line with the Runnymede 'First Homes Interim Policy Statement' and no objection is raised by Planning Policy.

Housing Mix (%) appears to be as follows:

	Policy SL19 Requirements		Proposed	
	Market	Affordable	Market	Affordable
1-bed	5-10%	10-20%	2%	31%
2-bed	25-30%	40-45%	11%	43%
3-bed	40-45%	25-40%	62%	26%
4+-bed	20-25%	5-15%	25%	0%

Whilst there appears to be an undersupply of 2 bed and oversupply of 3 bed market dwellings, the Council's latest monitoring suggests an overall plan wide oversupply of 1 & 2 bed units and undersupply of 3-4+ units. As such market housing mix is considered to be acceptable and will help to redress current oversupply of smaller market units. In terms of the size mix of affordable units, the Council's monitoring shows there has generally been an oversupply of smaller units, however as with tenure mix, Planning Policy would defer to any recommendations from the Council's Housing Team on affordable unit size and the case officer is requested to seek these.

Name of responding officer: [REDACTED] Date: ...18/08/2022.....