

Agenda Item IMD25

INDIVIDUAL EXECUTIVE MEMBER DECISION REFERENCE IMD2016 / 25

TITLE	Response of Wokingham Borough Council to the Consultation on the Issues, Options and Preferred Approaches for Runnymede Borough Council's Local Plan (Regulation 18)
DECISION TO BE MADE BY	Executive Member for Planning and Regeneration, Cllr Mark Ashwell
DATE AND TIME	9 August 2016, 11am
WARD	None specific
DIRECTOR	Director of Environment, Heather Thwaites
REPORT TO BE PUBLISHED ON	1 August 2016
VENUE	SF4

OUTCOME / BENEFITS TO THE COMMUNITY

To ensure that Runnymede Borough Council's Local Plan has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

RECOMMENDATION

The Executive Member for Planning and Regeneration

- a) approves the comments outlined in this report
- b) approves that they be submitted as a formal response to the consultation from Runnymede Borough Council on their Issues, Options and Preferred Approaches consultation on their Local Plan

SUMMARY OF REPORT

This report details the proposed response of Wokingham Borough Council (WBC) to the consultation on the Issues, Options and Preferred Approaches for Runnymede Borough Council's Local Plan.

The content of this report includes the following:

- Considering the impact of the Issues, Options and Preferred Approaches for Runnymede Borough Council's Local Plan on Wokingham Borough.
- WBC requests that Runnymede Borough Council reconsiders its preferred approach to its spatial strategy and works to ensure that it can accommodate its housing need within their housing market area in order to potentially avoid putting further strain on neighbouring authorities to accommodate any unmet housing need.

Background

Runnymede Borough Council (RBC) is consulting on its Issues, Options and Preferred Approaches to their Local Plan from 29th June to 17th August 2016.

RBC has chosen to combine the first formal consultation stage (Issues and Options) of the Local Plan process, with the second formal consultation stage (Preferred Options) of the Local Plan process.

Whilst the majority of Councils undertake an Issues and Options consultation followed by a Preferred Options consultation, in order to ensure that the public and all relevant stakeholders have the ability to shape and influence the development of a set of development options, it is possible to take the approach that RBC has taken; rolling both stages into one and then proceeding straight to the Proposed Submission stage.

RBC are seeking views on the vision, objectives, issues and options as well as suggested preferred approaches to its spatial strategy over the plan period up to 2035.

Analysis of Issues

Housing Need

RBC shares a Housing Market Area (HMA) with Spelthorne Borough Council, according to the Strategic Housing Market Assessment (SHMA). The SHMA identifies that within the HMA, there is a need for between 1018 and 1292 dwellings per annum (dpa) to be delivered between 2013 and 2033. The housing need apportioned to Runnymede is between 466 and 535 dpa (para 5.16 of the Issues, Options and Preferred Approaches document) and therefore Spelthorne's need is between 552-757 dpa.

Whilst WBC does not share an administrative boundary with RBC, the Royal Borough of Windsor and Maidenhead (RBWM) which is located within the Eastern Berks (including South Bucks) HMA, does share a boundary with Runnymede. There are concerns that any housing need that RBC (and also Spelthorne) cannot take could fall to RBWM (amongst others) to provide. The eastern Berkshire HMA (which comprises RBWM, Slough and South Bucks) is already indicating that it will be unlikely to accommodate its housing need and so the inability of RBC to take its housing need could therefore potentially put WBC under pressure to accommodate higher housing numbers from other areas.

Green Belt

Paragraph 80 of the National Planning Policy Framework (NPPF) states that the Green Belt serves five purposes:

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Green Belt designation covers 79% of the Borough of Runnymede. Paragraph 4.25 of the Issues, Options and Preferred Approaches document states that RBC has

undertaken a Strategic Review of their Green Belt and it has demonstrated that there are parts of the Green Belt that perform weakly or not at all against the 5 purposes of the NPPF. Given this information and the fact that RBC's Strategic Housing Market Area (SHMA) and its Employment Land Review has indicated that high levels of development need are required within the Borough (para 4.25), RBC is considering releasing some land within the Green Belt for development, and it has developed a number of options for an overarching spatial strategy within the document.

Options and Preferred Approach

RBC has developed seven options for the future development of the Borough. Of the seven options, three of them (options SS5 to SS7 on pages 36 to 41) would see Runnymede meet its objectively assessed need (OAN). The other four options (SS1-SS4 on pages 31 to 36) would involve neighbouring authorities being required to take on some of Runnymede's housing requirement to varying degrees, through Duty to Cooperate discussions.

Of the seven options put forward, RBC has stated that their Preferred Approach is Option SS3 (described in pages 33-35). Option 3 would see development within Runnymede's existing urban areas and on previously developed sites in the Green Belt and the release of some of the Green Belt land for housing allocation. It is not clear from the information submitted whether greenfield sites within the Green Belt have been considered for release. However, pursuing a strategy based on this option would only deliver between 56%-82% of Runnymede's OAN and any unmet housing need (between 83 to 233 dwellings per year) would have to be provided by neighbouring authority areas. Spelthorne have not yet produced their Issues and Options document which according to their Local Development Scheme is to be published in July/Aug 2016. The OAN for Spelthorne is between 552-757 dwellings per annum. It doesn't appear that Spelthorne will be able to meet any shortfall from Runnymede which means that across the housing market area the OAN will not be met.

RBC seeks to justify their preferred approach in paragraph 4.31 to 4.38. They explain that a balance must be struck between meeting their OAN and ensuring protection for areas of the Green Belt that perform well against the five purposes of the Green Belt listed in the NPPF. Paragraph 4.36 states: '*Runnymede places greater weight on the need to protect the overall integrity and function of the Green Belt than to fully meeting objectively assessed needs from more poorly performing sites*'. RBC does not clearly define what are regarded as poorly performing sites. In paragraph 4.37, RBC also cite the Borough's inability to provide sufficient infrastructure to support new development, as well as the inability to provide sufficient SANG (Suitable Alternative Natural Greenspace) to avoid impact to the Thames Basin Heath Special Protection Area as further reasons to justify their preferred approach of Option SS3. It is not clear from the document whether RBC have explored whether other authorities can provide SANG instead, so that RBC have a greater ability to meet their own housing need.

As stated above, whilst WBC does not share an administrative boundary with RBC, RBWM which is located within Berkshire's eastern HMA, does share a boundary with Runnymede. There are concerns that any housing need that RBC (and also Spelthorne) cannot take will fall to RBWM (amongst others) to provide. The eastern Berkshire HMA is already unlikely to accommodate its housing need and so the inability of RBC to take its housing need could therefore potentially put WBC under pressure to accommodate higher housing numbers from other areas.

It would be useful if RBC could fully explain the workings out of their OAN (and Spelthorne's OAN) in any future Local Plan documents.

Conclusion

WBC will not get an opportunity to formally make further representations comment to RBC's Local Plan until the Proposed Submission stage. As such, WBC requests that Runnymede Borough Council reconsiders its preferred approach to its spatial strategy and works to ensure that it can accommodate its housing need within their housing market area in order to potentially avoid putting further strain on neighbouring authorities to accommodate any unmet housing need.

WBC requests that Runnymede continues to engage with WBC as work on the Local Plan progresses, through the Duty to Co-operate mechanism.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in excess of £20m over the next three years and all Executive decisions should be made in this context.

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	N/A	N/A	N/A
Next Financial Year (Year 2)	N/A	N/A	N/A
Following Financial Year (Year 3)	N/A	N/A	N/A

Other financial information relevant to the Recommendation/Decision

N/A

Cross-Council Implications

N/A

SUMMARY OF CONSULTATION RESPONSES

Director – Finance and Resources	No comments received
Monitoring Officer	No specific comments on the report
Leader of the Council	No comments received

List of Background Papers

Runnymede Borough Council Issues, Options and Preferred Approaches (see Appendix B of the document, which can be found at the following link):
<https://www.runnymede.gov.uk/CHttpHandler.ashx?id=15314&p=0>

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Date 7/7/16	Version No. 1
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