

Schedule of responses to the South East Plan (SOS Proposed changes)

Secretary of States proposed change number	Panel's recommendation	Officer Response	Recommendation
Chap.4 (14)	<p>Policy SP5 Greenbelts The policy has been amended to include a line stating that a boundary review will be required in the area of the former DERA Site Chertsey.</p>	<p>Review of the greenbelt is only necessitated in Runnymede as the DERA site has been inserted into the South East Plan. Although Officers have concerns over the sustainability of this site, its location so close to the Thames Basin Heaths Special Protection Area and the noise and air quality issues associated with the M3, these issues will be dealt with by the Council in subsequent Development Plan Documents (DPD).</p>	<p><u>The Council has concerns about the sustainability of the DERA site, its location so close to the Thames Basin Heaths Special Protection Area and the noise and air quality issues associated with the M3.</u> To endorse the need to renew the greenbelt, if the plan maintains the former DERA site as a strategic mixed-use development.</p>
Chap.7(2)	<p>Policy H1 Housing Provision Increase the regional housing provision levels by 10% and revise level for the sub regions. The largest levels should occur in the London Fringe. (48,620 new units over the plan period)</p>	<p>Runnymede received an additional 2800 new units which is the highest proportion increase in the region. (Mainly through the allocation of the former DERA site). It is anticipated that this is an achievable number to plan for and is consistent with the Panel Report recommendations already reported to Committee.</p>	<p>To accept the requirement for Runnymede to provide 161 units per annum (excluding the former DERA site). However a Strategic phasing policy should be introduced to regulate the release of housing throughout the plan period. This will need to reflect the ability to provide additional social and physical infrastructure to accommodate the new growth in housing numbers.</p>
Chap.7(4)	<p>Policy H1 Housing Provision The policy has</p>	<p>The plan as currently drafted takes away the ability for local</p>	<p>Object to the reference of a minimum average</p>

Appendix 1

	introduced a new opening para that outlines that the housing figures should be regarded a minimum average targets.	authorities to effectively Plan, Monitor and Manage housing delivery through the plan period.	target in the opening paragraph and suggest removal of the word minimum to enable effective delivery of a known level of housing through the plan period.
Chap.7(4)	<p>Policy H1 Housing Provision</p> <p>The policy increases the district housing provision levels in accordance with table 7.2. It states that the largest increases should be in the economically buoyant parts of the region and related to strategic scale opportunities. This suggests that Runnymede increases its annual allocation from 146 per annum to 286 per annum with a total number of net additional units over the period of 5720. This is accompanied by a footnote that the figure for Runnymede includes 2500 for the reuse of the DERA site at Chertsey to be divided between Runnymede and Surrey Heath.</p>	<p>The policy outlines that Runnymede should provide 286 additional houses on an annual basis. This figure includes the 161 annual figure as well as the 2500 proposed for the former DERA site. Clarity is required in the plan that the Council will not be penalised for meeting a figure lower than the 286 per annum as it is likely that the former DERA site will not come forward until the later half of the plan period. The footnote states that the 2500 figure will be split between Runnymede and Surrey Heath. However all of the allocation is clearly located in Runnymede as such the footnote is misleading. It should also be noted that with the current "Credit Crunch" and possible recession even the lower levels maybe hard to achieve.</p>	<p>That footnote 8 of the policy be amended to read "The figure for Runnymede includes 2,500 for the reuse of the former DERA site at Chertsey to be divided between <i>provided in</i> Runnymede and Surrey Heath subject to further study including master planning to ensure the incorporation of SANGS. <i>This allocation will be delivered in the period between 2016-2026. Between 2006-2015 the annual requirement will be 161 dwellings per annum</i>" This provides clarity and enables Runnymede to properly programme the appropriate Development Plan Document though the Council's Local Development Scheme.</p>
Chap.7(4)	<p>Policy H1 Housing Provision</p> <p>The final two paragraphs of the original policy which</p>	<p>The final paragraphs of the original policy provide flexibility to the delivery of the housing requirement by</p>	<p>That the final two sentences of the policy are reinstated to enable local</p>

Appendix 1

	<p>enable the Local Authority to plan monitor and manage its housing delivery in a phased manner have been deleted. There appears to be no specific explanation.</p>	<p>enabling a phased approach. This has now been deleted, without commentary as to why. Officers believe that the original paragraphs are important to enable proper delivery of sites over the period of the plan and that without such a paragraph we could be open to large number of sites coming forward early in the plan period leading to much larger number of houses being provided over the period than our allocation suggests. This could lead to the using up of urban land putting more pressure in the future on the Council to allocate housing sites within the Greenbelt.</p>	<p>authorities to effectively manage and monitor the delivery of housing throughout the plan period.</p>
<p>Chap.7(6)</p>	<p>Policy H2 Managing the Delivery of the Regional Housing Provision This is an additional policy which sets out the way in which authorities should deliver the regional housing requirement. This includes the need to maximise development on previously developed land. The main area of importance is the supporting text which talks about the need for the housing numbers to be treated as minimums and that higher housing levels should be tested through Local Development Documents.</p>	<p><u>The supporting text of the policy suggests that increasing the district housing numbers will be dealt with through a review of the plan at a later stage. This statement also relies on the NHPAU figures which have not be subject to any public scrutiny. Any review must be accompanied with an appropriate assessment of where additional housing can be achieved at a district level and the additional social and physical infrastructure that will need to be secured to make additional housing work. The use of the word minimum in the policy appears as a backdoor way of achieving higher</u></p>	<p>Object to the references to the housing allocation being a minimum requirement, as increasing the district housing numbers this will be dealt with through a review of the plan at a later stage. This should be accompanied with an appropriate assessment of where additional housing can be achieved at a district level and the additional social and physical infrastructure that will need to be secured to make additional housing work. <u>Suggest the removal of Para 7.8 of the supporting</u></p>

Appendix 1

		<p><u>numbers without proper testing. As such reference to minimum housing figures should be removed and a proper assessment of housing numbers undertaken when the plan is reviewed as suggested in the supporting text.</u></p> <p>This is a new policy and is a further requirement for local authorities to treat the housing numbers in the plan as a minimum. It states that they should be seeking to provide a higher requirement through their own local development plan documents. The supporting text also makes reference to the review of the plan to respond to the higher figures set out by the National Housing and Planning Advice Unit (NHPAU) which will be required in the near future. This approach places local authorities in a weaker position in rejecting sites in less sustainable locations, on the basis that they are not needed (the reserve sites for example). As such it is suggested that this policy along with similar changes to policy H1 should be challenged.</p>	<p><u>text.</u></p>
<p>Chap.7 (11)</p>	<p>Policy H3 Affordable Housing The main change to this policy of note for Runnymede is with regard to the emphasis on local authorities to demonstrate that the levels of affordable</p>	<p>This policy now places the burden on local authorities to identify the financial viability of their affordable housing thresholds and quantum. This will require the Council to undertake such a study</p>	<p>To note the policy approach</p>

Appendix 1

	<p>housing that they are requiring from new development are financially viable. Previously the emphasis was on applicants to provide this information.</p>	<p>to enable the further progression of the Core Strategy. This requirement is already set out in Planning Policy Statement 3 (PPS3).</p>	
Chap.9(23)	<p>Policy NRM 6 Thames Basin Heaths Special Protection Area The regional policy on the Thames Basin Heaths Special Protection Area has been re-positioned to the Natural Resources Management chapter of the South East Plan the main changes relate to clarification that the policy relates to residential development. It states that Local Authorities should take a leading role as the competent authorities and that the zone of influence should be established where measures will need to be taken to ensure the integrity of the SPA is protected. In the interim this is set at 5km linear distance from the SPA.</p>	<p>These changes have implications for our Interim strategy which is currently based on the 5.2km drive-time standard which will need to be amended in the near future</p>	<p>To note the policy approach <u>and comment that the DERA site is in close proximity to the SPA. The implications of this allocation and the impact it may have on the SPA have to date not been fully assessed.</u></p>
Chap.10(32)	<p>Policy W17 Location of Waste Management Facilities The main change to this policy has been the removal of elements of a paragraph relating to the location of waste facilities in the Green Belt. This previously set out that facilities such as these in the greenbelt should not be precluded as long as there were no alternative sites and that the proposal would not cause harm to the objectives of this</p>	<p>The reason for the suggested change is stated as "for consistency with Green Belt policy and the other policies in the RSS". However officers believe that this is in conflict with PPG2 which sets out in paragraph 3.4 what constitutes acceptable development in the Green Belt this does not include waste facilities and as such we recommend that the deleted paragraph</p>	<p>Objection requesting the following paragraph to be reinstated "<i>Where this is the nearest appropriate location, where there are no alternative sites and provided that the development would not cause harm to the objectives of the designation.</i>"</p>

Appendix 1

	designation. The revised version states that waste management facilities should not be precluded from the Green Belt.	should be reinstated.	
Chap.11 (15)	Policy C7 The River Thames Corridor This is a new policy This is a new policy which has been added as recommended in the panel report. This seeks that local authorities should work together to establish a coordinated policy framework for the river and its valley corridor	This policy places further requirements on the riparian local authorities in the region. This will require further explanation through Runnymede's Local Development Framework.	To note the additional policy change
Chap.20 (2)	Policy LF1 Core Strategy This policy sets out the main approach to development in the London Fringe area. The policy has been amended to more positively promote the economy and the need to provide housing. To this end the emphasis about protecting the Green Belt have been watered down to enable small scale greenbelt review and to enable the development of the DERA site at Chertsey.	Review of the greenbelt is only necessitated in Runnymede as the DERA site has been inserted into the South East Plan. Although Officers have concerns over the sustainability of this site and its location so close to the Thames Basin Heaths Special Protection Area these issues will be dealt with by the Council in subsequent Development Plan Documents. (DPD's)	To note the policy change
Chap.20 (4)	Policy LF2 Economic Development The thrust of this policy remains the same with the aim to use existing land for employment use and that Local Authorities should collect relevant evidence of employment land availability. The policy makes specific reference to where the existing stock of land is considered insufficient new land will be	A Planning Permission already exists for new office development at the DERA site as such the suggested policy in the RSS reflects a situation already accounted for through the Development Control Process.	To note the policy approach

Appendix 1

	allocated in Development Plan Documents as part of sustainable urban extensions and on the former DERA site at Chertsey.		
Chap.20 (6)	<p>Policy LF3 Broad Amount and Distribution of future housing development</p> <p>The policy sets out the provision of additional housing in each of the London Fringe authorities. Consistent with policy H1. This states that Runnymede's annual rate is 286 with a footnote that the figure includes 2500 new dwellings at the former DERA site.</p>	<p>The plan as currently drafted outlines that Runnymede Borough should provide 286 additional houses on an annual basis. This figure includes the 161 annual figure as well as the 2500 proposed for the former DERA site. Clarity is required in the plan that the Council will not be penalised for meeting a figure lower than the 286 per annum as it is likely that the former DERA site will not come forward until the later half of the plan period. Also within this policy and in others it states that development of the DERA site will be undertaken in conjunction with Surrey Heath yet no allocation of housing is made against them in policy H1. It is therefore suggested clarity is provided and that other uses and mitigation measures are provided in the Surrey Heath element of the site.</p>	<p>That footnote 1 of the policy be amended to read "The figure for Runnymede includes 2,500 for the reuse of the former DERA site at Chertsey to be divided between <i>provided in</i> Runnymede and Surrey Heath. The precise housing contribution form this site will be tested in accordance with Policy LF6 <i>This allocation will be delivered in the period between 2016-2026. Between 2006-2015 the annual requirement will be 161 dwellings per annum</i>" This provides clarity about which authority is delivering the allocation and enables Runnymede to properly programme the appropriate Development Plan Documents through its Local Development Scheme. It also provides clarity as to the number of houses to be provided annually through the first</p>

Appendix 1

			part of the period.
Chap.20 (12)	<p>Policy LF6 Development at Former DERA site, Chertsey</p> <p>This policy sets out that large scale mixed use development at Chertsey will be brought forward in the plan period to meet wider regional needs. It goes on to state that a review of the Green Belt should be carried out.</p>	<p>The inclusion of this policy and site into the plan has come somewhat late in the development of the plan and has not allowed for a full and frank discussion about the positive and negative aspects of the site. It is unlikely that the site will be brought forward in the first half of the plan and as such this should be clarified in the Policy.</p>	<p><i><u>There is some concern that the former DERA site was included without a full sustainability appraisal or adequate consultation (until now). Any development of the site should be accompanied by a full assessment of the social and infrastructure requirements and its impact on the Thames Basin Heaths –SPA. Should the policy be retained then the change in D2 should be made.</u></i></p> <p>Note the inclusion of the policy but request the following change. “Large-scale mixed-use development on the former DERA site at Chertsey, which lies in Runnymede and Surrey Heath districts will be brought forward during the Plan period 2016-2026 period of the plan to meet wider regional needs.”</p> <p><i><u>Full consideration needs to be given to the social and physical infrastructure requirements and the impact of development on the Thames Basin Heaths - SPA</u></i></p>

Appendix 1

Chap.20 (17)	Policy LF9 The Suburbs This policy has been deleted	Policy has been deleted as it replicates policy advice set out in Policy BE2	Note deletion
Chap.20 (19)	Policy LF10 Small Scale Tariff Policy to establish joint working to seek the provision of infrastructure which takes into account the cumulative impact of small scale development.	Runnymede (as part of the Surrey Collaboration Project) is already seeking contributions towards small scale projects through its tariff approach and as such is in line with this policy.	To support the policy approach