



The response of the Egham Residents' Association to the Runnymede 2035 'Additional Sites and Options Consultation 2017'.

The Egham Residents' Association responded to the 'Runnymede 2035: Issues, Options and Preferred Approaches' consultation document on August 23rd last year and to the 'Green Belt Review Part 2' on May 17th this year.

We attach both of these responses, and we stand by the comments we made in them.

In the latter we expressed great consternation over the recommendation from Arup that a lot of land – including Mrs Caddey's Field in Whitehall Lane and the site of the Egham Leisure Centre – be considered by Runnymede Borough Council for removal from the Green Belt.

We are relieved, therefore, that none of the sites in the Egham 'buffer zone' that were 'recommended' by Arup appears in the list (Table 2 on page 15) in the 'Additional Sites and Options' document showing "the additional Green Belt sites which the council has identified as being the most suitable locations for allocation in the Local Plan".

Paragraph 4.2 makes it plain, however, that on this matter we have to remain vigilant and apprehensive. It states that "the potential location of amendments to the Green Belt boundary" is not yet confirmed and that "specific amendments to the Green Belt boundaries will not be set out until the Council's list of allocations for inclusion in the Runnymede 2035 Local Plan have (sic) been finalised".

We resent having to keep our loins girded for potential battles over the Green Belt. And the fact that a question mark is kept hanging over Mrs Caddey's Field and other sites on the Egham 'fringe'

underlines our conviction that Runnymede Council's Green Belt strategy is basically wrong.

The 2015-17 Government was keen for it to be understood that it regarded the Green Belt as "sacrosanct". Communities Secretary Sajid Javid used that adjective in the House of Commons in July last year – before adding the rider that development should never be carried out on the Green Belt "unless there are very exceptional circumstances".

What constitutes "exceptional circumstances" has not been defined. And surely it is incumbent on central government to do so both generally and specifically and to argue that "exceptional circumstances" apply to a local authority area requiring the council to plan for the erosion of its Green Belt.

It should not be the other way round. Councils should not go pleading to the government that "exceptional circumstances" should allow them to cut into their Green Belt to provide housing. But this consultation document suggests that the latter is happening in Runnymede when it states, on page 31, that the risks associated with spatial strategy option SS3 are "the ability to demonstrate the exceptional circumstances to release Green Belt".

Furthermore, it strikes us that under the proposed strategy, reducing Runnymede's Green Belt to build houses will not be exceptional. The council was already talking of cutting the proportion of Green Belt land in the borough from 79pc to 77pc, and now it is proposing to go further in order to commit itself to a higher housing target. A further 90 residential units are proposed in Blays Lane, Englefield Green, and no fewer than 420 (plus a 70 bedroom care home) on a site at St Peter's Hospital. Both sites are in the Green Belt. This would allow the council to get closer to its Objectively Assessed Need (OAN) for housing in the period up to 2035, but at the further expense of the Green Belt.

We have noted – and would very much welcome a response to it from Runnymede Council - a report in the Times on May 8th this year stating that "councils do not have to accept the targets produced by the (OAN) assessment if they have large amounts of Green Belt or other protected land, such as national parks, areas of outstanding natural beauty and nature sites". It went on to say that Brighton and Hove council has set a homes target less than half of its OAN.

We remain of the view – expressed in our response last year to the ‘Issues, Options and Preferred Approaches’ consultation – that Runnymede Council should adopt the SS1 option of allowing housing development only on existing urban land and previously developed sites in the Green Belt. The council should vigorously defend the Green Belt – every inch of it unless a swap with land of at least equal worth is available – and keep urging the central government machine to stop talking with a forked tongue about Green Belt policy. It should not aid and abet Whitehall duplicity, and do central government’s dirty work for it.

The big background factor in the pressure to facilitate a scale of housing development that will seriously diminish the quantity and quality of Runnymede’s Green Belt is a forecast of an increase of almost 20pc in the borough’s population in the period 2013-2033 (to just over 100,000).

Runnymede Council should be expected to facilitate only an increase in population that can be accommodated without incursions into the Green Belt.

The extra volume of new housing that Runnymede Council is now setting out to achieve raises further anxiety about the ability of the local infrastructure to cope.

A heading above paragraph 3.19 in this consultation document asks: “Will the (housing) allocations in the Local Plan be supported by the necessary infrastructure?”

Can anyone say with any great degree of confidence that the answer to that question will be “Yes”? The scale of the challenge – set out in the 260-plus pages of the Infrastructure Needs Assessment 2017 – is daunting. If it is not met, then an infrastructure that is already creaking and groaning in many respects will be put under even more strain. And another fundamental question – especially in relation to the road ‘improvement’ schemes mentioned in that document – is: Is it desirable that more of our borough should be concreted over to provide a structure of supporting services for a substantial increase in housing?

In our response to the “Issues, Options and Preferred Approaches” documents we said that the picture it painted of Runnymede in 2035 is not a pretty one. It is a picture of a borough with a substantially increased population and a substantially diminished Green Belt – and the two go hand in hand.

If this picture becomes a reality, the Runnymede of 2035 will be seriously diminished. It will be a borough that many of today's residents will no longer wish to live in.

And this decline is actually being planned! We repeat our assertion that a plan that seeks to facilitate and manage a decline in quality cannot be a good plan.

Chris Fisher