

Peter Simms
Civic Offices
Station Road
Addlestone
Surrey
KT15 2AH

31 May 2006

Dear Peter

RUNNYMEDE LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY

Further to my letter dated 7 April, and your response dated 13 April, I would like to amend the Assembly's representations on the Runnymede submitted draft Core Strategy.

As you now, following submission of our representations, Assembly officers have met with Runnymede officers to discuss the issues raised. As a result of this constructive dialogue and the analysis of the Runnymede Housing DPD and Development Control DPD (which had not previously been taken into account in the preparation of the Assembly's representations on the Core Strategy), the Assembly would like to withdraw its representations on the following policies contained within the Core Strategy DPD:

- CS3 (Pollution and Climate Change)
- CS5 (Water and Energy)
- CS6 (Car Use)
- CS10 (Biodiversity)
- CS14 (Smart Economic Growth)
- CS15 (Employment Land Supply)
- CS16 (Town Centres)
- CS17 (Village and Local Centres)
- CS 18 (Tourism)
- CS 19 (Structure Plan Housing)

The Assembly also withdraws its representation on Policy CS7 (Infrastructure and Mitigation Measures) on the understanding that a Planning Obligations DPD will be forthcoming in due course and address the issues raised.

The Assembly's outstanding representations request that the RPG9 / Surrey Structure Plan and draft South East Plan district housing allocation figures for Runnymede are stated within the policy wording of CS19 (Structure Plan Housing) and CS20 (South East Plan Housing) respectively. The Assembly seeks this change to the Core Strategy in order to provide greater certainty and clarity for the purposes of delivering regional planning objectives. The Assembly is seeking this policy commitment to housing delivery in all submitted draft Core Strategies.

If Runnymede Borough Council agreed to the inclusion of the relevant district housing allocations in Policy CS19 and CS20, the Assembly would withdraw its outstanding representations on the Core Strategy. As a result the Core Strategy would, assuming no other significant policy changes were made by the council, be considered by the Assembly to be in general conformity with the adopted Regional Spatial Strategy (RPG9) and the draft South East Plan.

I hope this letter serves to clarify the Assembly's position, which has benefited from a constructive dialogue with your officers. If you have any further queries do not hesitate to contact me.

Yours sincerely

Catriona Riddell
Planning Strategy Director

Cc John Chesterton, GOSE

Core Strategy / Statement of Community Involvement (SCI) Submission Stage Representation Form February 2006

Document to which this representation relates: *(please tick)*

Core Strategy	✓	Key Diagram		SCI	
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	1. Personal Details	2. Agent Details (if applicable)
Title	MRS	
First Name	CATRIONA	
Last Name	RIDDELL	
Job Title (where relevant)	PLANNING STRATEGY DIRECTOR	
Organisation (if applicable)	SOUTH EAST ENGLAND REGIONAL ASSEMBLY	
Address Line 1	1 BERKELEY HOUSE	
Address Line 2	CROSS LANES	
Address Line 3		
Town	GUILDFORD	
Postcode	GU1 1UN	
Telephone	01483 555 200	
Email Address	catrionariddell@southeast- ra.gov.uk	

3. Did you raise the matter that is the subject of your representation with Runnymede Borough Council earlier in the process of the preparation of the Document, i.e. before it was submitted for examination? *please tick*

No	✓
Yes (at Issues & Options Stage in Sept / Oct 2004)	
Yes (at Preferred Options Stage in Sept / Oct 2005)	

If 'No', can you briefly explain why you did not do so:

At the earlier stages of the Runnymede Core Strategy preparation the Assembly's available resources and focus meant that we were unable to comment in detail. At the time the Assembly took the opportunity to remind Runnymede that Development Plan Documents should be in general conformity with the current Regional Spatial Strategy (RPG9 and Alterations)¹; and at the Preferred Options stage to also take account of the emerging Draft South East Plan, Part 1 (Core Regional Policies) of which was handed to Government at the end of July 2005.

¹ Regional Transport Strategy (2004), Energy Efficiency and Renewable Energy (2004), Tourism and Related Sport and Recreation (2004), Ashford (2004), Milton Keynes and South Midlands Sub Regional Strategy (2005)

4. To which part of the Document does your representation relate?

Paragraph	
Policy	CS19
Table	
Key Diagram	

5. Do you wish to **object** to or **support** the above paragraph / policy / table / key diagram? (please tick one only – it is essential that you complete this question)

Object Go to Qu.6	<input checked="" type="checkbox"/>
Support Go to Qu.7	<input type="checkbox"/>

6. If you are **objecting**, please identify which test of soundness your objection relates to (please use the relevant test numbers 1 – 9 listed in the attached Tests of Soundness). Please note you should complete a separate form for each test you have an objection for.

Soundness Test no.	4 c) vi)
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Please give details of the change(s) you consider necessary to the above paragraph / policy / table / key diagram to make the Document sound, having regard to the test you have identified above. You will need to say why this change will make the Document sound. Please be as precise as possible to allow us to make full use of your comments.

Change Sought

Transfer and state the housing requirement figure from schedule I of the reasoned justification to the policy wording provide clarity and greater certainty to the policy. To reflect Policies H1, H2 of RPG9 and Alterations' and Policy LO6 of the adopted Surrey Structure Plan (2004) detail should be included within Policy wording of the number of additional new dwellings required during the period the Core Strategy covers, 2006-2016.

Justification of Change

Policy CS19 fails to satisfy PPS12, Test of Soundness, Test 4 (c) (vi) as important detail from the adopted Regional Spatial Strategy (RPG9 and Alterations)¹ and adopted Surrey Structure Plan (2004) is omitted from the wording of the Policy.

The vagueness and lack of clarity of Policy CS19 and over reliance the reasoned justification to provide important detail may undermine the implementation of the Regional Spatial Strategy. The policy therefore fails to satisfy PPS12 (2004) Test 4 (c) (vi).

The change sought would ensure that Policy CS19 is 'Sound' and conforms to Regional Spatial Strategy.

Expanded Justification

Section 17(5) of the Planning and Compulsory Purchase Act 2004 ("the Act") states that if to any extent a policy set out in a Local Development Document conflicts with any other statement or information in the document, the conflict must be resolved in favour of the policy. Similarly, Part 4 of the Town and County Planning (Local Development) (England) Regulations 2004 (No.2204) states that Local Development Documents must contain a reasoned justification of the policies contained in it and the parts which comprise each must be clearly identified (Regulation 13).

Planning Policy Statement 12: Local Development Frameworks (2004) states that the Core Strategy should contain clear and concise policies for delivering the strategy which will apply to the area or parts of it (without identifying particular sites). The PPS contains a separate section on the reasoned justification. This section states that the reasoned justification included in any development plan document is clear, succinct and necessary to provide context to the policy, and should set out how it contributes to the soundness of the document. It should not contain new policies or expand on the policy to which it applies and should not contain material which will itself be used for taking decisions on planning applications.

The Assembly considers on the basis of this legislation and guidance that the Runnymede Core Strategy fails to satisfy PPS12, Test of Soundness, Test 4 c) vi) as important detail from the adopted Regional Spatial Strategy (RPG9 and Alterations)¹ and adopted Surrey Structure Plan (2004) is being omitted from the substantive policies and on the basis of their vagueness and lack of clarity it gives them less weight and therefore weakens them. In particular in two possible instances: first, in the event that the wording of another policy conflicts with a statement contained in the reasoned justification the other policy would prevail. Secondly, for development control purposes, applicants could seek to take advantage of the vagueness of the policies and, quite legitimately state less weight should be given to the reasoned justification.

The vagueness and lack of clarity of substantive policies and an over reliance on important detail contained within reasoned justification may prejudice the Regional Spatial Strategy from being implemented and delivered. As such the Assembly considers unable, under the provisions of Section 24 (1) (a) of the Act, give the opinion that the Runnymede Core Strategy is in general conformity with the Regional Spatial Strategy. The Core Strategy therefore fails to satisfy Test of Soundness, Test 4 c) vi) as set out within PPS12 (2004).

To ensure that the Core Strategy is 'sound' and satisfies 'Test 4 (c) vi) of PPS12 (2004) the Assembly under the provisions of Section 24 (6) of the Act, is seeking changes to the substantive policies to include important detail currently contained within reasoned justification.

¹ Regional Transport Strategy (2004), Energy Efficiency and Renewable Energy (2004), Tourism and Related Sport and Recreation (2004), Ashford (2004), Milton Keynes and South Midlands Sub Regional Strategy (2005)

7. If you are **supporting**, please identify which test of soundness your supporting comment relates to (please use the relevant test numbers 1 – 9 listed in the attached Tests of Soundness):

Soundness Test no.	
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Please give details of your reasons for support in the box below:

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8. Can your representation be considered by written representation or do you consider it necessary to attend the Examination? *please tick*

Written Representation	<input checked="" type="checkbox"/>
Attend Examination	<input type="checkbox"/>

9. If you wish to attend the Examination, please outline why you consider this to be necessary:

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Please note you may not automatically be invited to attend the Examination as the Inspector will decide the most appropriate procedure to consider representations.

For any questions or queries relating to the Representation Form or Tests of Soundness, please contact the LDF Team:

Laura Cowie	01932 425275
Rachael Rooney	01932 425274
Jane Peberdy	01932 425252
Bob Etheridge	01932 425270

Core Strategy / Statement of Community Involvement (SCI) Submission Stage Representation Form February 2006

Document to which this representation relates: *(please tick)*

Core Strategy	✓	Key Diagram		SCI	
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No	✓
Yes (at Issues & Options Stage in Sept / Oct 2004)	
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At the earlier stages of the Runnymede Core Strategy preparation the Assembly's available resources and focus meant that we were unable to comment in detail. At the time the Assembly took the opportunity to remind Runnymede that Development Plan Documents should be in general conformity with the current Regional Spatial Strategy (RPG9 and Alterations)¹; and at the Preferred Options stage to also take account of the emerging Draft South East Plan, Part 1 (Core Regional Policies) of which was handed to Government at the end of July 2005.

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4. To which part of the Document does your representation relate?

Paragraph	
Policy	CS20
Table	
Key Diagram	

5. Do you wish to **object** to or **support** the above paragraph / policy / table / key diagram? (please tick one only – it is essential that you complete this question)

Object Go to Qu.6	<input checked="" type="checkbox"/>
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Change Sought

Transfer important detail from paragraph 23.15 of the reasoned justification to the policy wording to state the level of district housing provision in the policy to provide certainty. To reflect Policies HI and LF2 of the Draft South East Plan as submitted to Government on 21 March 2006 detail should be included within Policy wording of the number of additional new dwellings required during the period the Core Strategy covers, 2006-2016.

Justification of Change

The Policy fails to satisfy PPS12, Test of Soundness, Test 4 (c) (vi) as important detail from the emerging Regional Spatial Strategy (the Draft South East Plan as submitted to Government on 21 March 2006) is omitted from the wording of Policy CS20.

The vagueness and lack of clarity of Policy CS20 and over reliance on the reasoned justification to provide important detail may undermine the implementation of the Regional Spatial Strategy. The policy therefore fails to satisfy PPS12 (2004) Test 4 (c) (vi).

The change sought would ensure that Policy CS20 is 'Sound' and conforms to Regional Spatial Strategy.

Expanded Justification

Section 17(5) of the Planning and Compulsory Purchase Act 2004 ("the Act") states that if to any extent a policy set out in a Local Development Document conflicts with any other statement or information in the document, the conflict must be resolved in favour of the policy. Similarly, Part 4 of the Town and County Planning (Local Development) (England) Regulations 2004 (No.2204) states that Local Development Documents must contain a reasoned justification of the policies contained in it and the parts which comprise each must be clearly identified (Regulation 13).

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The Assembly considers on the basis of this legislation and guidance that the Runnymede Core Strategy fails to satisfy PPS12, Test of Soundness, Test 4 c) vi) as important detail from the emerging Regional Spatial Strategy (the Draft South East Plan, as submitted to Government on 31 March 2006) is being omitted from the substantive policies and on the basis of their vagueness and lack of clarity it gives them less weight and therefore weakens them. In particular in two possible instances: first, in the event that the wording of another policy conflicts with a statement contained in the reasoned justification the other policy would prevail. Secondly, for development control purposes, applicants could seek to take advantage of the vagueness of the policies and, quite legitimately state less weight should be given to the reasoned justification.

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