



Runnymede 2035: Issues, Options and Preferred Approaches consultation, 2016

This document paints a fascinating and quite depressing picture of the Borough of Runnymede in 2035.

It is one in which the population has grown substantially to exceed 100,000, putting more pressure on already creaking infrastructure. It is also one in which the Green Belt has been eroded to accommodate demand for more housing.

Would this Runnymede be better to live in than the Runnymede of August 2016? It is very difficult to see how the answer to that fundamental question can be anything other than 'No'. Indeed, a good sub-heading for the document would be "We Are Planning To Make Runnymede More Like Spelthorne".

We understand that planning officers feel obliged to find a middle way balancing competing and conflicting demands - for example, for the defence of the Green Belt and for steps to help young people brought up in the borough to carry on living here. We understand that they are troubled by the planning inspector - quoted in paragraph 4.26 - who opined in 2014 that that council had not "positively sought opportunities to meet the development needs of Runnymede".

The residents of Runnymede do not have to applaud, however, when presented with plans that would change the character of the borough for the worse. A plan that would allow things to become worse 20 years hence cannot be a good plan.

The Green Belt is a crown jewel both for the nation and Runnymede Borough. The 'green lung' thinking behind it remains absolutely sound and it should remain a solid - indeed, inviolable - barrier to the coalescence of the urban centres in the borough.

If the housing option preferred in the document were pursued, the proportion of Green Belt land would be cut from 79pc to 77pc. It can be argued that that

is a modest reduction. It can also be argued – fairly – that some of the Green Belt land in the borough is not pleasing on the eye and that its planning status looks odd.

To go off on this course is, however, to set out on a slippery slope. A two percentage point reduction in the Green Belt by 2035 would set a precedent for a similar cut by 2055. Little by little a national and local treasure could be taken away from us and future generations.

The argument that ‘we’re proposing to remove bits from the Green Belt that are unloved and unnoticed’ is very dodgy. The Green Belt continues to serve a good purpose, and diminishing it is wrong in principle. No-one would be favourably impressed by a mugger who pleaded in mitigation that he only did it a little bit and only to unattractive-looking people.

We believe that Runnymede Council should commit itself only to housing development that can be built at a reasonable pace on urban land in the borough, and that it should resist and expose Whitehall double-speak that trumpets ongoing commitment to the Green Belt while actually conniving at its erosion.

We very much regret that this document makes virtually no reference to the ‘student problem’ that has been inflicted on the town by the ongoing expansion of Royal Holloway College. The character of Egham has been much changed – for the worse - by the conversion of traditional family homes into houses of multiple occupancy to accommodate students. This is greatly resented, and it is a big factor locally in the shortage of housing available at the lower end of the market.

Recognition of this problem – let alone a plan for dealing with it – is conspicuous by its absence from the document.

The Egham Residents’ Association supports the ‘Gateway’ plans for the regeneration of the town centre, and we welcome the broad thrust of the retail chapter of this document. But we have concerns about the character of the proposed renaissance, which we shall further express below.

The ERA is also disappointed by the failure in the document to give due emphasis to the difficulties with level crossings that inflict a daily blight on people’s lives in Egham, and by the absence of any commitment to try to address the issue.

The document also skips very lightly over the issue of the Heathrow Third Runway – though Runnymede Council is officially opposed to it - and it ought to express opposition to any further widening of the M25 (including the

'double-decker' motorway through the borough that has recently been mooted by Highways England).

We think the document should also re-emphasise that Runnymede Council is firmly opposed to the gravel raising threat at Milton Park Farm, which has been casting a shadow over Egham for many years. (In October 2013, members of the council's planning committee voted unanimously to raise "the strongest possible objection" to it.)

Furthermore, we find the chapter on flooding seriously inadequate. The danger of flooding in the town was shockingly illustrated in February 2014 when the Egham Meads were turned into an inland sea and much of the town was also under water.

We are also concerned that not one of the candidates we put forward for local green space designation has been accepted.

Further detailed comment:

### Chapter 3 - Portrait of Runnymede

A key factor in the thinking in the document is the forecast - referred to in paragraph 3.7 - that over the period 2013-2033 the population of the borough will grow by just under 20pc to 100,088.

The document should set out, in detail, how this forecast has been come by. To what extent does it reflect 'natural' growth in the borough's population? And to what extent does it accommodate an expected demand for economic migration into the borough?

Given the planning restraints on the borough, especially the fact that almost 80pc of it is designated Green Belt, why should it be expected to make any provision for economic migration in the form of additional housing?

Further to this, we note with concern, the statement in the "Weaknesses" list on page 21 that "the infrastructure may not be able to accommodate the expected population growth in specific parts of the Borough". Which specific parts does this comment - which is basically a statement of the utterly obvious - have in mind?

We welcome the commitment “to reduce pollution in Air Quality Management Areas” that appears in the “Opportunities” list on page 22, but we would welcome a detailed explanation of what it means.

The same list includes the statement that “Royal Holloway has an approved masterplan which will enable the university to grow and upgrade the education offer”.

We request that this item be taken out of the “Opportunities” list and be put in the “Threats/challenges” list immediately below it.

As was shown in the recent debate on the Royal Holloway Masterplan planning application, there is a gulf between majority thinking on Runnymede Council and the attitude of many residents of Egham - and, indeed, Englefield Green - when it comes to further expansion of the college. It seems to us that the council ‘just does not get it’, and this erodes confidence in its willingness properly to defend the character of Egham.

#### Chapter 4 - Spatial Vision, Objectives and Strategy

The ERA takes exception to paragraph 4.4, which we regard as a demonstration of positive spin. It masks the fact that if the thinking in the document is implemented, Runnymede will be a less attractive place to live in than it is now. A reasonable translation of “the general extent of the Green Belt will have been protected” is “we shall vigorously defend the Green Belt except those bits which we plan to hand over for development”.

We note the definition of sustainable development in paragraph 4.6 as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”. But what about development that compromises the ability of future generations to enjoy the same landscape and environment as exists today? If that were the criterion, the proposed Borough Plan would fail it.

Paragraph 4.9 succinctly shows the root of the problem that this document seeks to answer. It states that the National Planning Policy Framework calls both for action “to boost significantly the supply of housing” and for protection for the Green Belt. In the case of Runnymede, this is an appeal for steps that are intrinsically contradictory and inimical.

Paragraph 4.13: The ERA is pleased and relieved that none of the ‘Resultant Land Parcels’ - which are proposed for removal from the Green Belt - is in

the Egham ward of RBC. The two Thorpe Lea Road land parcels are on the edge of Egham, however, and we reject on principle the approach of cutting into the Green Belt to meet (or go further towards meeting) housing targets. Our philosophy is unapologetically one of 'Not an Inch'.

It is stated in paragraph 4.16 that the Runnymede proportion of the 'objectively assessed housing need for the Runnymede and Spelthorne council areas is 466 to 535 extra homes per year (which seems to meet a description of 'about 500 per year').

The 'preferred option' SS3 in this document proposes to deliver between 56pc and 82pc - a very wide range - of the objectively assessed housing need for Runnymede by providing for the construction of between 302 and 383 dwellings per year in the borough.

From our perspective, this is plainly preferable to going for the full '500' per year. But, as is acknowledged in paragraph 4.34, the 302-383 target could be met only by using not just existing urban sites but also "previously developed sites in the Green Belt, returning the village of Thorpe to settlement and releasing land

in the Green belt at some of the Resultant Land Parcels identified in the Green Belt Review".

We consider this approach fundamentally unacceptable, and appeal to the council instead to adopt the SS1 option of allowing development only on existing urban land and previously developed sites in the Green Belt.

This would provide for the building of about 170 additional dwellings per year in Runnymede. It is a small borough, and such an increase, year-on-year over the Borough Plan period, would make some considerable impact on its character. We have no reason for believing that a typical resident of Egham today would wish to see further housing development of top on that at the expense of the Green Belt.

We note that this option would allow a surplus of up to 83,000sqm of office floorspace. We further note that a 'deficit' of 41,000sqm of storage and distribution 'industrial' floorspace could be partially met by arrangements with neighbouring authorities.

## Chapter 5 - Housing

The early paragraphs of this chapter invite us to restate the views we expressed with regard to the last chapter, but we see little point in repetition.

Paragraph 5.21 on the brownfield land register: We are pleased that Runnymede is one of the 73 councils involved in the pilot scheme to help bring more brownfield land back into use for housing.

We note with interest and some bemusement the references in this chapter to the need for “affordable housing” in the borough. Paragraph 5.38 states that “Runnymede is an area where property prices and rents have risen to such an extent.... that they have become unaffordable for many who earn a ‘typical’ income. This prices people out of the local property market as they find it difficult to find a home in the area.”

This is a real problem, and so is the lack of starter homes. For many of the offspring of today’s residents of Runnymede, carrying on living in the borough of their upbringing is an unrealizable dream.

We believe that much emphasis should be placed on addressing these issues by the provision of new housing in urban areas. But we have to point out that on the same page (50) as paragraph 5.38 referred to above is a section on “students”, in which there is no recognition of the fact – and it is a fact - that the shortage of lower-end-of-the-market housing in Egham (and Englefield Green) is much

exacerbated by the growth of the off-campus Royal Holloway student population in the area.

Hundreds of traditional family homes in the Egham district have been removed from such use by their being turned over to student use, and a high proportion of such dwellings are former council houses and other types of ‘cheaper’ housing. This underlines the big mistake that the council has made in allowing and indeed encouraging the expansionism of the college.

We agree with the view of the National Organisation of Residents’ Associations that “there should be a national planning policy to limit student expansion where it is destroying the sustainability of the community”, and we think RBC should have the courage and foresight to be a pioneer in this respect.

## Chapter 6 - Retail and the Economy

The ERA wholly approves of the fact that RBC has a 'masterplan' for the re-invigoration of the Egham town centre, and we totally support in principle the proposed 'Gateway' redevelopment schemes for Station Road North and the High Street.

We are haunted, however, by the thought that we shall end up with a mini-Woking or something echoing the redevelopment of Addlestone. Egham has a proud history and character, and these must be respected and continued.

There is a strong desire in the town for individual shops with a distinctive flavour - like, for example, the Genevieve's shop in Englefield Green - rather than branches of national or multi-national chains. We trust that the council will do all in its power to further this objective.

Paragraph 6.47: We support requiring at least 65pc of total units to remain in A1 retail use within a designated primary shopping frontage, but would like the minimum to be a little higher. We also believe that the minimum for A1 use for units within secondary shopping frontages should be 40-50pc.

We applaud paragraph 6.48. Town centre uses outside their traditional habitat can be very destructive, and it is absolutely right to lower the threshold to 500sqm for demonstrating that there will not be an adverse impact on a town centre.

Paragraphs 6.49 and 6.50: The council should resist any significant drawing in of town centre boundaries.

## Chapter 7 - Built Environment

We very much welcome the statement in paragraph 7.1 that "it is therefore important that we look for high quality design in new development to preserve and enhance our historic and natural environments whilst adding to the qualities that make Runnymede an attractive place to live and work". But we are bound to take this with more than a few pinches of salt. Has the council learnt from the recent mistake regarding 40-41 Egham High Street, a key 'gateway' site that was crying out for a high-quality design scheme? Does it now fully endorse the statement in paragraph 7.6 that "the NPPF sets out that good design is indivisible from good planning and should contribute positively to making places better for people"? We very much hope so.

## Chapter 8 - Natural Environment

We welcome the broad thrust of this chapter. Our borough seems almost permanently to be under siege by people with undesirable development schemes, and its 'natural environment' - including all of the existing Green Belt - needs all the protection it can get.

We note with some irritation the reference to Local Green Spaces in paragraph 8.29, and we shall have more to say about this with regard to the next chapter.

## Chapter 9 - Recreation, Green Space and Leisure

Paragraph 9.24, Local Green Spaces: This is quite a sore point for the ERA. We originally wrote to the council (Appendix A) suggesting eight sites in Egham for designation as a Local Green Space. Not one of them was chosen, and we have already notified RBC (Appendix B) of our feelings about that. To repeat, the criteria used for designation leave much to be desired.

We are surprised and baffled by the fact that the 'Options' document makes only fleeting reference to "the enhancement at Egham Leisure Centre" and swimming pool provision in the borough. Why does it have so little to say on the subject?

Paragraph 9.29: A small cinema, on the lines of that in Walton-on-Thames, could be a winning element in the proposed 'Gateway' redevelopment in the Egham town centre. We request that consideration be given to this.

Paragraphs 9.33 and 9.34, Ten pin bowling: If such a facility were to be "directed" towards Egham, we think it would be better housed at the Leisure Centre than in the town centre.



## Chapter 10 - Heritage

Egham's town centre is a designated conservation area, and we trust that with regard to the proposed 'Gateway' redevelopment we shall not need to keep reminding RBC of what is said in paragraph 10.25: that is that "it is important that development both within and outside of designation conservation areas should not adversely affect the character or appearance of the conservation area by the introduction of incongruous layouts or forms of development or development out of scale with the surroundings impacting on important views and groups of buildings from inside and outside the conservation area boundary".

The ERA feels that Egham's position as the closest town to the location of the sealing of Magna Carta has long been under-played - including last year's 800<sup>th</sup> anniversary celebrations.

We hope that RBC will be willing to do all it reasonably can to promote the trumpeting of this link. Might it be possible, for example, to have signs at the entrances to Egham welcoming people to 'the Magna Carta town'?

Further to this, we appeal to RBC to urge Surrey County Council to change its mind about the proposed pelican crossing that would give better access to Runnymede Meadows (and thereby strengthen Egham's linkage to its Magna Carta heritage).

## Chapter 11 - Transport and Infrastructure

Paragraph 11.5 on bus services: For many people in Egham, buses are the most attractive option for travelling to Staines. Perhaps RBC could ask the bus companies to change the timetable so that the 71 and 441 services do not so often arrive almost simultaneously in Egham, leaving travellers with a half-hour wait for the next bus.

Paragraph 11.7 makes reference to libraries. Is consideration still being given to moving the Egham library into the town centre as a feature of the

'Gateway' redevelopment? We believe such a move could be considerably beneficial for both the town centre and the library.

Only brief reference is made in paragraph 11.20 to the problems caused in Egham by the railway level crossings. This is a major scourge for the town, and it is high time that a proper strategy for dealing with it - a move that could also greatly facilitate rail access into Heathrow - was produced. We urge RBC to do what it can in this respect, and to address the issue specifically in the forthcoming Borough Plan. The problem will not go away on its own; indeed, it is liable to get steadily worse.

Reference is made in paragraph 11.22 to the planned widening of the M25 to five lanes each side between Junctions 10 and 12. This does not directly affect Egham, but we - and the FLAME (Four Lanes Are More than Enough) group, of which we are a member - oppose this as a continuation of a failed 'widen and fill up' strategy.

That Highways England has not yet learned its lesson in this regard is shown by its recent floating of a scheme for a 'double-decker' M25 all the way between J10 and J16. This would be an utter abomination, and RBC should make its opposition to it clear.

Network Rail's recently published plans for southern rail access into Heathrow, referred to in paragraph 11.25, have caused considerable anxiety in Egham. One option would involve the permanent closure of the level crossings in the town, without it being made at all clear what would replace them. Another, proposing a rail line running alongside the eastern side of the M25 through Egham, would inflict more indignities on the local environment and landscape. We think the 'Options' document should have more to say about this.

Similarly, the document is very coy about the council's opposition to the proposed third runway at Heathrow. It is an opposition that hardly dares to speak its name - even though some neighbouring (Conservative-run) authorities are taking legal action and fighting with everything they have. This timidity is unacceptable, given that giving the go-ahead for the third runway would have very bad consequences for air quality, noise and traffic congestion in at least the northern part of the borough. Shame on RBC!

Further to this, the "will" on page 126 in "recognise that airport expansion at Heathrow will need a co-ordinated approach to transport and traffic

management” is a minor irritant. Can the “will” be replaced by “would”? The third runway is not definitely going to happen.

On a relatively mundane, but nonetheless very irksome, issue, can this document be amended to express frustration with the general and ongoing failures of Surrey County Council as a highways authority?

Some roads in Egham have been littered with pot-holes for over two years. Grange Road is a case in point, and it is not a minor side-street; it gives access to many other roads, yet the road surface belongs to the third world. We wish to add that many roads signs in Runnymede borough are dirty, pointing the wrong way or covered in foliage. A good number of them warn of danger - or are supposed to.

SCC also fails repeatedly to object to planning applications on highways grounds even though common sense is screaming that a development will exacerbate an already significant congestion problem. What does it need to get SCC to ‘take its finger out’?

Paragraph 11.32: After the experiences of February 2014, much hope is placed in the RTS (River Thames Scheme) flood alleviation plan. This is a long-term scheme, however. But more of this in response to the next chapter.

## Chapter 12 - Flooding

The floods of February 2014 came as a rude shock for Egham in general, and many people were badly affected personally in suffering damage to their properties and lives.

What comfort is there for them in this chapter? Not a lot. Even with the RTS scheme - which is not forecast for completion until almost 2030 - it seems to add up to a shrug and a conclusion that ‘not a lot can be done’.

There is little evidence here of the strategic thinking needed to try to avoid a repetition of the events of two years ago and to help the borough cope better if there is a recurrence.

This chapter makes repeated reference to the various types of flooding that residents are threatened by. And far from being a rare problem, surface water flooding is now a very common issue for several parts of Egham. Every time there is a heavy shower, a number of roads in the town flood. The drainage

simply cannot cope. Is there really nothing Surrey County Council can do to diminish this problem?

This also seems a good point further to complain about the 'Options' document's failure to make reference to - let alone express opposition to - the gravel-raising threat at Milton Park Farm that appears to have become a permanent feature of life in Egham.

## Summary

This document is no doubt well-intentioned. But it is not the robust defence of the borough's character and quality of life that we think we have the right to expect.

In particular, it embraces a misconceived strategy of appeasing pressure for housing by chipping away at the Green Belt. The 'crocodile' will not be persuaded to go away by throwing it the occasional tit-bit.

The document has many other flaws and we feel let down by it.

The Borough Plan should be a plan for improving the borough. We are on course, instead, for a plan of managed decline and retreat.

Chris Fisher

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## Appendix A

Local Green Spaces - Email sent to RBC on December 15, 2015

The Egham Residents' Association wishes to make the following response to Runnymede Borough Council's consultation document on the designation of Local Green Spaces:

We would like, in an ideal world, to see all the spaces listed below become LGSs, but we can easily see that some of them might quickly fall foul of the designation criteria. However, nothing ventured, nothing gained. All of the spaces are in Egham or on its borders.

### 1) The Manorcrofts Playing Field.

We do not claim that this space has any particular local significance in respect of its beauty or its wildlife value. It does, however, have substantial recreational value. It contains play equipment – swings, a roundabout and a slide – provided by RBC, and also basic sports facilities for adults as well as children.

It is a key asset for the town as its one-and-only public playing field, and its location – close to the town centre, and adjacent to both the Manorcrofts School and the railway station – make it an easily accessible area for recreation and finding tranquillity.

It has a special place in the town's heart. And this was shown by the political furore that arose in the early 1980s when RBC decided to sell it for private housing development. The row led to the formation of the Egham Residents' Association, to the election of Independent councillors in the Egham ward, to High Court legal action and – by no means least – an RBC climb-down that saved 80pc of the playing field. This background also gives the space some significance, we contend, in terms of recent local history.

We have no reason for supposing that the town's feelings about the playing field are any less strong today than they were then.

### 2) Walnut Tree Gardens

As with 1), we do not argue that this space has any particular significance in terms of wildlife or beauty. It is much valued, however, as a tranquil spot in the High Street, and it is particularly popular among students of Strode's College, which is situated almost directly opposite. The Egham Band gives a concert here every summer, and it is much treasured in the town.

### 3) Milton Park Farm and Mrs Caddey's Field.

This area, on the southern border of the town, has Green Belt status and therefore has to be considered in the light (or otherwise) of paragraph 3.15 of

your consultation document. Milton Park Farm is also a potential gravel-extraction site, and might be considered an “extensive tract of land”. In respect of both these last points, perhaps Mrs Caddey’s Field could be considered separately as an LGS if it is concluded that Milton Park Farm cannot.

Mrs Caddey’s Field has been described as the first piece of rural land that travellers from London see on the line to Ascot and Reading.

It and Milton Park Farm provide a very fine landscape, and are worthy of very strong planning protection because of that – including the views of Royal Holloway College – the proximity to (the Grade One Listed, Tudor and pre-16<sup>th</sup> century) Great Fosters Hotel and the area’s function as a green buffer between Egham and Stroude/Virginia Water.

#### 4) Egham Cricket Ground and the Sports Centre land in Vicarage Road.

The Egham Cricket Ground is very pleasing on the eye, and is a greatly valued asset to the town. It should be inviolate from development, and if LGS designation could be given to provide it with further protection, then it should.

The Sports Centre land – by which we mean the green areas adjacent to Vicarage Road, and not the land used for car-parking - is also much appreciated in Egham as a local green space, notwithstanding the noise that drives over it from the M25.

5) The Manorcrofts School Playing Field (NOT to be confused with the Manorcrofts Field) is obviously very important for the school and its pupils, notwithstanding its proximity to the M25 and the fact that a threat of gravel-raising hangs over it.

6) Strode’s College playing field. Similarly, this is very important in terms of recreational activities at the college, and it also provides an excellent green aspect to the Egham urban area from the A30 Egham by-pass.

7) Nobles Field. This land, in Whitehall Lane at the bottom of the Royal Holloway College complex, is also an important recreational facility. It is Green Belt land, but was recently seriously threatened by the college’s Masterplan scheme for expansion (in its original form).

#### 8) The Egham Meads or Runnymede Meadows.

The historical importance of this area should hardly need emphasizing in what is still the year of the 800<sup>th</sup> anniversary of the sealing of Magna Carta. Its landscape

importance also speaks for itself. It most probably has all the protection from development it needs – not least because of the risk of flooding. But we thought we'd mention it.

Yours,

Christopher Fisher

For the Egham Residents' Association

Appendix B

Email sent to RBC on July 4, 2016

Dear Sir or Madam,

The Egham Residents' Association is very disappointed that not one of the several sites we suggested for designation as a Local Green Space has been recommended for such status in the assessment just published.

We are particularly concerned about the conclusions regarding the Manorcrofts Playing Field and Walnut Tree Gardens, and we regret the apprehension that this may cause in the town. Both locations are in close proximity to the community they serve, are demonstrably special to the local community and hold particular local significance.

The scores or marks given to the Manorcrofts Playing Field are highly questionable. A score of only 3 for recreational value? Really? This is the main playing field in Egham. If it scores only 3 out of 5, that says more than a little about the council's lack of investment in facilities there. Secondly, it is extraordinary that a score of zero was given for historical significance. Looking at the criteria, we can see how this has happened. But the fact is that a row over the proposed destruction of the field for housing development in the 1980s caused the biggest local political upheaval in Egham since the second world war. Someone with responsibility for local green space designation ought to appreciate that there is more to history than archaeological sites, listed buildings and monuments.

Yours faithfully,

Christopher Fisher

Planning co-ordinator, Egham Residents' Association