



Dated: 21<sup>st</sup> February 2018

## **Runnymede 2030 Draft Local Plan Consultation**

The Egham Residents' Association regards this document as highly objectionable.

Right at the start we wish to express regret that we have been pushed to express our views on it within a template focusing on “legal compliance”, “soundness” and “duty to co-operate”.

Paragraph 1.13 of the Draft Local Plan says that “we want to hear your views on the contents of this document”. But only, it seems, if they are expressed in a certain way. This template looks to us like a straitjacket designed to restrain freedom of speech, and we greatly dislike it.

There is a clear implication that if the Draft Local Plan satisfies the criteria set down – including achieving “soundness”, partly by complying with the National Planning Policy Framework - everything must be fine and dandy.

We disagree. That is not our idea of “soundness” at all. Complying with the NPPF does not necessarily make the Draft Local Plan “sound” in terms of serving the best interests of the borough and its residents.

But, using the terminology given to us, we contend that the Draft Local Plan fails to achieve “soundness” and is not “justified” because it repeatedly does not use “the most appropriate strategy when considered against reasonable alternatives”.

We object to it in the broad because it is a route-map to decline and deterioration in the character of the borough. If its policies and objectives are carried through, Runnymede will be a less attractive and desirable borough to live in in 2030 than it was in 2015. How can that be considered progress?

We also object to it on a number of specifics. We object that it proposes to take a sizeable bite out of the Green Belt in our borough. We object that it fails to have a bespoke policy covering Egham’s town centre. We object that it offers nothing to arrest, let alone reverse, the contagion of family homes being converted into student HMOs in Egham. We object that its policies on design and conservation areas appear to be useless.

The draft local plan is essentially about the management of encroaching urbanisation. We wrote in 2016 that a good sub-heading for the “Runnymede

2035: Issues, Options and Preferred Approaches” document of that year would be “We Are Planning To Make Runnymede More Like Spelthorne”.

We stand by that comment. Indeed the outlook for Runnymede borough is worse now than it was then.

The pressure on the local council to accommodate additional housing has increased. And a salient consequence of that is a proposed slashing of the proportion of Green Belt land in the borough.

In the “Issues, Options and Preferred Approaches” document it was acknowledged that the proportion of Green Belt land would fall from 79pc to 77pc.

No comparable figure is to be found in the Runnymede 2030 Draft Local Plan. It is conspicuous by its absence. And it is absent, we strongly suspect, because it is politically embarrassing. For the 77pc figure has actually become approximately 75pc.

In a brief period of 15 years – just the blink of an eye - the proportion of Green Belt land in the borough would be cut by four percentage points. Over such a timescale this is more akin to butchery than to delicate surgery.

By no means the least of the problems with this is that a precedent would be set. In no time at all, developers and under-pressure planners and councillors would be preparing for the next set of land releases from the Green Belt .

The Housing and Communities Secretary, Sajid Javid, has spoken in the House of the Commons of the Green Belt’s being “sacrosanct”. But it takes little analysis to realise that what he and his colleagues mean when they use such rhetoric is that the Green Belt is sacrosanct – except when it isn’t.

The Green Belt threat facing Runnymede borough is being echoed in several other parts of Surrey.

It is happening because ministers are exerting pressure for housing land-releases that fly in the face of their supposed commitments to the Green Belt. It is happening, moreover, even though the Cabinet has no fewer than four Surrey MPs (including our own). The Minister of State in the Ministry of Housing, Communities and Local Government is also a Surrey MP.

Erosion of the Green Belt is not inevitable. And seeking to maintain the integrity of it is not Nimby-ism. The concept of having a green ring round London and other major cities to stop urban sprawl and to act as a green ‘lung’ is just as valid today as in the 1940s and 1950s. Indeed, even more so in an era of great population pressure and huge threats of environmental pollution.

The Green Belt is supposed to be a national treasure. And the idea that chipping away at it is acceptable is wrong and dangerous. Yes, not all parts of it are beautiful. But we shall repeat what we said in response to the “Issues, Options and Preferred Approaches” document: “Diminishing it (the Green Belt) 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.” And once Green Belt land is lost to development, it is lost for ever.

We remain of the view that as a predominantly Green Belt borough, Runnymede should be expected to facilitate only a supply of additional housing that can be provided, at a reasonable pace, on designated urban sites. Emphasis should be placed in this on providing affordable housing for first-time buyers. Many young people brought up in the borough currently stand no chance of getting their feet on even the lowest rung in the housing ladder.

This factor has been greatly aggravated in recent years in the Egham area by the expansionism of Royal Holloway College.

Under plans regrettably approved by Runnymede Council, the college is growing from 8500/9000 students to about 12,000. About 1000 of the extra students are not to be accommodated on campus. Consequently, there has been a rash of conversions in Egham from traditional family homes to houses of multiple occupancy. A good many of these have occurred in homes at the lower end of the market that would have given young first-time buyers more of a chance had they not been converted to student use.

A number of streets in the town have been turned into an unofficial extra campus of the college, and the council has been unwilling to lift a finger to stop this phenomenon. A policy in the Draft Local Plan to help deal with this is also conspicuous by its absence. Over the past year or so, there have been planning appeal decisions in Leeds and Nottingham showing that councils can get official backing if they stand up to waves of student development, but Runnymede Council is taking no notice.

Pressure for developments including student accommodation – some of them involving the loss of office floorspace - has also been increasing in the Egham town centre as well as in residential side-streets, and the Egham Residents' Association believes that there should be an Egham-specific town centre policy in the Draft Local Plan. Chertsey and Addlestone do not have this problem.

What sort of quantity of student accommodation is Runnymede Council hoping to establish in the town centre? Does it really have no concern over the loss of offices to make way for student accommodation in the town centre? What is the vision of the council for the town centre? Does it really have one? Is its thinking led merely by its own financial and property considerations? Why does it show so little interest in good design in the centre of Egham? Does it actually understand Egham at all? We very much doubt it. We look for coherence and leadership, but there is a void.

Further detailed comment:

1) Chapter 3 Portrait of Runnymede. In paragraph 3.6 it is stated that the population of Runnymede borough stood at 83,448 in 2013 and that this is forecast to grow to 100,088 in 2033. The forecast is for a substantially higher rate of growth in 2013-2033 than in 2001-2013. Why? What is driving the forecast population growth? Is Runnymede council expected to build additional housing

faster because the population will grow at a faster rate? Or will the population grow at a higher rate because it will be accommodated by a faster rate of house-building?

2) Chapter 4 Issues and challenges. Many people in the Egham area will be bemused that our proximity to Heathrow Airport and the M25, M4 and M3 motorways is listed only in “strengths” and that the Royal Holloway College Masterplan is only in the “opportunities” list. To put it mildly, each of these is a mixed blessing, and they should also appear in the “threats/challenges” list.

3) Chapter 5 Strategy for Sustainable Development. This chapter discusses sustainable development at some length without once defining what it means by it. The Draft Local Plan is actually proposing that almost 7500 additional homes will be built in the borough in 2015-30. Doing that would bring a substantial change to the borough’s urban areas. Moreover, it can be achieved only by slashing into the borough’s Green Belt as well. The talk, therefore, in this chapter of “maintaining the long-term integrity of the Green Belt” is at best public relations gloss and at worst cynicism and duplicity. Driving bulldozers across swathes of the Green Belt is not sustainable development. The borough should define sustainable development, without requiring cross-reference to national policy.

The ERA is pleased that none of the sites proposed for removal from the Green Belt for housing development is in the Egham Town ward. But we are confident that this is a short reprieve, and that we shall not be so lucky next time. What we have here is the thin end of a very nasty wedge.

4) Policy SD2 Spatial Development Strategy, page 34. Our association is bewildered by two of the references to Egham made under Table 1 on this page. For a start, the listing of net additional dwellings and student bedspaces under “Egham including the area of Staines upon Thames which is located in the borough” is very odd. It is a simple matter of fact that no part of Staines is in Runnymede borough. It’s like saying that parts of Middlesex are in Surrey. Old postal addresses are, or ought to be, irrelevant.

Second – and more important: The table states that 2821 student bedspaces are to be provided in “Egham” in 2015-2030. There is a separate figure of 561 for student bedspaces in Englefield Green on page 35.

These figures are impossible to reconcile with what is said about students in paragraph 6.58 on page 105. It is stated there: “By 2031 the College (Royal Holloway) hopes to increase student numbers to 12,000. This will be met by increasing the capacity of university owned accommodation, in halls of residence or purpose-built student accommodation, by 2650 to 5580.”

The point is that all – or virtually all – of the university owned student accommodation is in Englefield Green and not Egham. So why is there a 2821 additional bedspace figure for Egham on page 34 (and a much smaller one for Englefield Green)? We wish to add that a map accompanying the Holloway College ‘masterplan’ planning application for its big expansion scheme (planning

application RU14/0099) shows that the proposed new accommodation would be sited on campus in Englefield Green.

This is not a pedantic point. The 2821 student bedspace figure for Egham has certainly been noticed in the town, and has caused consternation. If it is simply a map error, why is Runnymede Council so reluctant to acknowledge it?

5) Paragraph 5.44 Transport and infrastructure. Does Runnymede Council seriously believe that there will be a direct rail link to Heathrow if the 3<sup>rd</sup> runway is not built? If such a link were created, it could – depending on its route and form – increase the ‘down’ times at the level crossings in the Egham area without actually serving the borough; there could be ‘through’ services that would not stop at any station in Runnymede and would lead to a reduction in stopping services.

6) Policy SD6 Infrastructure. The building of new housing on a substantial scale will bring requirements for additional infrastructure – including alleged road improvements. But often these will add to the environmental degradation perpetrated by the extra housing. Two wrongs do not make a right.

Furthermore, there is no evidence that there is sufficient funding available for the proposed infrastructure ‘improvements’, and developers will often claim (in the absence of a Community Infrastructure Levy) that developments may have affordable housing or infrastructure, but not both. For this reason it is essential that policy SD6 is strengthened and demands a commitment to the delivery of the infrastructure required by new developments before those developments commence.

7) Supporting Local People. Health and Wellbeing. Can it please be explained why this chapter does not even mention the M25, which runs through the borough, or Heathrow and the immense threat to public health posed by the proposal to build a Third Runway there? The ignoring of these issues seems to make the chapter meaningless.

8) Policy SL20 Affordable Housing. The ERA approves of this policy in principle. But we note with much concern the great gap between the need for affordable housing (Paragraph 6.32) and the 30pc proportion actually proposed. We think the latter figure is too low. Moreover, how can we have any confidence that the council will get even close to realizing it? Developers seem to be able to run rings round councils – certainly not just Runnymede – on the issue of development ‘viability’.

9) Policy SL23 Students. We have already voiced concern in our point 4 in our detailed comment about the scale of student accommodation that is being provided in the Egham area following the granting of planning consent for the expansion of Royal Holloway College.

In short, many people in the town have had more than enough of it. They feel that Egham is rapidly and relentlessly changing, and that they are being turned into strangers in their own town. We cannot even be certain how many student

HMOs there are in the Egham area – despite ongoing efforts to find out - but we are sure that the figure greatly exceeds the total of about 220 in Egham/Englefield Green that we have managed to elicit from the council because that figure is based on large HMOs only. There are ways – for example, council tax – of finding out how many students live in market housing that is probably HMOs, but thus far the council has shown no interest in investigating this critical matter for the town.

Given the ‘opportunity’ and ‘challenge’ presented by Holloway College, and the huge part it plays in Egham’s economy, housing market, transport etc, understanding where students live and the impact this has on local housing stock should form a central part of understanding what the policy direction for Egham should be.

The problem is clearly set to continue, moreover. A leading aspect of the phenomenon is the turning of family homes into student HMOs. And Policy SL23 appears to provide carte blanche for this to carry on when it states: “Planning permissions for purpose built student housing and changes of use subdividing existing buildings for the purpose of student housing will be granted provided that all of the following criteria are met:”

The criteria that do follow seem to provide little obstacle to further growth in the number of HMOs in the Egham area, given the proximity to Holloway College.

Is there really nothing that can be done to stop Egham being turned further into Hollowayville or College Town? If Runnymede Council cannot see the problem and will do nothing – by studying the examples of the Leeds and Nottingham planning appeals (quoted above) for example, or employing an Article 4 Direction to prevent further family homes being converted into HMOs under permitted development rights – what hope is there? Many people in the town will be left quietly to fume about what is being done to their town while local planning officers and councillors twiddle their thumbs and look the other way.

It is worth adding that at a recent meeting with representatives of our association, Runnymede council’s chief planning officer said his advice to remaining families in roads like Moore Grove Crescent and Lynwood Avenue in Egham was to move out - to make way for more students. This is a wholly unacceptable approach, and contrary to national policy.

10) Enhancing the Environment Design. The Egham Residents’ Association has repeatedly asked Runnymede Council’s chief planning officer why the borough does not have a design guide, and has yet to receive a convincing answer.

Policy EE1 says that “whether within the borough’s urban areas or Green Belt, development proposals will be expected to achieve high quality design...”

The proof of the pudding is in the eating, however, and our scepticism is justified by the story of the development scheme that was the subject of planning application RU17/1164.

The proposal was for the construction of 105 student units in a block at 40-44 Egham High Street. The site is in the Egham conservation area, but the chief planning officer recommended it for approval – even though in the opinion of our association it acted as a reminder of both Stalinist architecture and Legoland.

Fortunately, the council's planning committee had the good judgment to reject the scheme. But when the chief planning officer was subsequently asked if he would have recommended the scheme for approval if Policy EE1 had been in place, he said "Yes".

In the light of that reply, what confidence can we have in the policy? If schemes like the one just mentioned are examples of good design, then that concept has no meaning to the ordinary citizen.

Policy EE1 must commit to the delivery of a design guide. But this may take some time, and key 'design principles' should therefore be set out in policy EE1.

11) Conservation areas. We shall make the same point about Policy EE5 and conservation areas. If the scheme for 40-44 Egham High Street is compatible with a conservation area, then there is no point in having the policy or conservation areas.

12) Policy EE2 Environmental protection Given the location of Runnymede borough, we find it bizarre that Policy EE2 makes no specific mention of pollution from the M25 and Heathrow Airport.

The main threats to the quality of life in Egham include those that come from Heathrow Airport, the M25 and the expansion of Holloway College, but there seems to be hardly any awareness of this in the Draft Local Plan. Indeed the council appears to regard these factors solely as bonuses and opportunities.

13) Policy EE13 Managing Flood Risk Those of us who lived in Egham through the flood of February 2014 will never forget it. Has enough action really been taken to prevent a comparable or worse occurrence? We very much doubt it.

14) Green Belt Pages 140-144. We approve of what is said here. But, given that the council is proposing to take a very sizeable chunk out of the Green Belt, these pages speak of its being prepared to swallow a camel with little complaint yet being very vigilant against swallowing flies.

15) Retail and town centre development . The High Street is at the heart of Egham, and special care needs to be taken of it. The town has a proud history, stretching back to Magna Carta, and the presence of Holloway College and Strode's College has given it a strong student population. If one is walking along the High Street at lunch-time and one is the wrong side of 50 one quickly becomes aware of one's age.

In short, Egham is different. And it should not be lumped together with Addlestone and Chertsey in policies covering all the three principal town centres in the borough.

Over the past year and more Runnymede Council has been drawing up proposals for the 'Gateway West' redevelopment of the Station Road North area. ERA's role in this has been essentially as a by-stander. Runnymede Council's idea of public consultation is to bring proposals close to a status of fait accompli and then say "What do you think?"

We have had decidedly mixed feelings so far about the ideas for 'Gateway West'. We liked the ambition of the Italia Conti scheme, but felt that some of the buildings were of an inappropriate scale and height. We were also perplexed by the lack of car-parking provision. Above all, there was a feeling that it 'just wasn't Egham'.

Time and again we have told the movers and shakers at Runnymede that we don't want to finish up with a mini-Addlestone or mini-Woking. Time and again we have been told: "Don't worry, that won't happen." But when we first saw the Italia Conti scheme, we thought: "But it is happening."

What is the problem here? Why do our hopes of schemes with lots of character and small shops turn into modernist visions of glass and steel? By the way, we are quite taken with the latest idea of trying to bring a small cinema into Gateway West, but on past form it would be foolish to raise our hopes very high.

What is driving Runnymede Council's thinking about the town centre? Is the fact that it owns so much of the land, and is keen to make money out of it, actually getting in the way of good planning? Why won't it spell out its thinking about the size of the student population that should be housed in the town centre? Why does it seem so indifferent to good design and the town's history? Why do pleas for a coherent strategy and a bespoke Egham town policy go unanswered? What happened to the comprehensive Egham Town Centre Masterplan tabled in November 2013 by consultants – and has never been seen again? This 'vision' should not simply be a background document to the Local Plan; as it is the only visionary document produced for Egham, some of its content deserves actually to be in the Local Plan.

Against this background, we have great reservations about the futures of the "Egham Gateway East allocation" and the three Egham High Street "opportunity areas" earmarked in this chapter.

The Gateway East site, the Arndale, is a monument to 1960s bad planning and design. It provides a wonderful opportunity to regenerate the centre of the High Street with the creation of a lively town square outside Tesco (and the outlook would be even better if Waitrose actually fronted on to the High Street.) But is Runnymede Council up to the task? The wording on page 162 isn't exactly inspirational.

The "High Street North Opportunity Area" raises many questions. Hardly anyone seemed to realise that the redevelopment of the area, which includes the Tesco site, was even a remote possibility. The red line border of the site is generating much concern, not least because it includes a large area of car-parking. If the shops are to be retained, then the red line should not include them.

Furthermore, given that most people are not aware of the role of the Local Plan and of the current consultation, it is not appropriate to draw a red line that runs so close to people's houses, when the nature of the proposal is not known and adjoining properties have not been directly invited to comment on the process.

It is difficult for us to read about the "Strode's College Lane Opportunity Area" without a sense of foreboding. This site is a quintessential 'gateway' site. If sensitively developed, it could do wonders for the town centre. But the attitude of Runnymede's planning bureaucracy seems to be that anything will do.

The "Egham Library Opportunity Area" does seem to be sitting there waiting for housing development. The library ought to be much closer to the town centre. Why is not being mentioned in connection with Gateway West?

16) Policies IE5 and IE6. We believe that retail uses should be concentrated and protected in town centres, and we therefore support Policy IE5. We also support the commitment in IE6 to keeping a minimum of 65pc of A1 use in primary shopping frontages, but we think the 30pc aim for A1 uses in secondary shopping frontages is too low.

17) Table 3 on page 158 is incomprehensible. What do the figures for Egham town centre mean? The 295 figure, for example; 295 what?

## Summary

As we said in response to the "Issues, Options and Preferred Approaches" consultation, we accept that his document is well-intentioned. Our borough is under siege, however, and this response to the threats to it is horrendously weak and limp-wristed.

On the issues of Heathrow Airport, the M25 and Holloway College this document has virtually nothing to say. Heads are being buried in the sand.

On the issue of the Egham town centre it fails to provide a coherent way forward and in regard to student HMOs it does nothing to diminish the despair in the town.

On the issue of the incursions that are proposed to be made into the Green Belt to provide housing, this Draft Local Plan is even worse. It joins in a pretence that nothing much is amiss and that nothing much will be missed. This is myopic and dangerous. The crocodile will not be appeased. It will be back for more.

Already it is possible to foresee a time when young people in the Outer Greater London Borough of Runnymede will ask: What was the Green Belt?

We ask that our responses to earlier documents in the current borough plan cycle be taken into account.

## Appendix

### Main suggested amendments to the Draft Local Plan.

1) Chapter 8 should include a comprehensive bespoke policy for the Egham town centre. The policy should recognise Egham's history and heritage but also recognise that, not least because of the expansion of Royal Holloway College and the consequent demand for substantially extra student accommodation, the challenges in its town centre are not the same as those facing Chertsey and Addlestone.

The policy should cover the whole of the town centre area, including its 'Gateway allocations' and its 'opportunity areas'. It should make clear to what extent the council wants to have new student accommodation in the town centre, and the extent to which it is prepared to accept the loss of office and other commercial floorspace to facilitate the provision of student housing and housing generally.

The High Street North opportunity area includes all the shops on the north side of the High Street between Runnymede Road and Hummer Road. If these shops are not to be developed (the text refers to the yards at the rear), then they should not be included in the site allocation. This is a major proposal for Egham, and yet the details of what is proposed are not clear. If the site is considered likely to come forward 'down the line' then this should be made clear too. Most residents of homes adjoining the site will be unaware of this proposal, and the site allocation should expressly state 'Subject to consultation with adjoining properties'.

The policy should also include a town centre parking policy. If the council's attitude is (as seems to be the case) that large-scale development in the town centre can take place without any significant additional parking, this should be justified, given that public transport is mediocre at best.

2) Policy SL23 on students. This policy should be altered to state that Runnymede council will seek to use whatever powers it can, including Article 4 Directions, to stop the further spread and concentration of HMO conversions for student accommodation in the Egham area. The policy should also require new student accommodation to be linked to Holloway College to prevent speculative student development that is not required or is unsuitable.

3) There should be a policy in the Draft Local Plan saying that Runnymede council will require Holloway College to construct on campus a substantially higher proportion of the extra student accommodation made necessary by its 'Masterplan' expansion than is currently envisaged. This would ease the HMO tide in Egham and also ease the pressure for Green Belt land releases.

4) Policies EE1 (townscape and landscape quality) and EE5 (conservation areas) must be toughened – to ensure that schemes like the one for 40-44 Egham High Street recently rejected by Runnymede Council (planning application RU17/1164) cannot be endorsed by the council's planning department. The Draft Local Plan should commit to the production of a Runnymede Design Guide. These policies

must not only make reference to local vernacular but also look for improved design, given some of the poor quality late-20<sup>th</sup> century buildings in Egham. These bad examples should not influence future design.

5) Policy EE2 should include specific reference to the M25 and the proposed Heathrow 3<sup>rd</sup> Runway. So should the 'Health and Wellbeing' section at the beginning of Chapter 6.

6) Last but not least: The ERA believes that the whole foundation of the Draft Local Plan should be changed to ensure that Runnymede's Green Belt does not have to be eroded to provide additional housing. We fully recognise that this is very radical and amounts to a fundamental challenge to the idea of the council's having to meet Whitehall-led housing targets that will inevitably destroy parts of the Green Belt. We know we are spitting into the wind, but someone has to do it to try to expose the humbug and double-speak that the Draft Local Plan embraces.

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