

THORPE NEIGHBOURHOOD PLAN

REGULATION 14 REPORT: FEBRUARY 2020

Purpose

1. The purpose of this report is to summarise part of the outcome of the consultation period on the Pre-Submission Thorpe Neighbourhood Plan held from 8 November to 20 December 2019. The report reviews the representations made by the statutory consultees, and by developers/landowners. It then makes recommendations (**in bold**) for minor modifications to the Plan prior to its submission to Runnymede Borough Council.

2. The report will be published by the 'qualifying body', Thorpe Neighbourhood Forum, and it will be appended to the Consultation Statement that will accompany the submitted Plan in due course, in line with the Neighbourhood Planning (General) Regulations 2012 (as amended).

Consultation Analysis & Recommendations

3. During the consultation period, representations were made by Runnymede Borough Council, Thames Water, Highways England, Historic England, Surrey County Council and Tarmac Trading Ltd. Representations were also received from Barton Willmore on behalf of CEMEX UK Properties Ltd in relation to Land North of Coldharbour Lane and Urbana Town Planning on behalf of Simco Homes Ltd in relation to Land off Rosemary Lane.

4. Runnymede Borough Council (RBC) the Local Planning Authority, confirm their general support for the neighbourhood plan, and apart from detailed comments on Policy TH2 (iv) Land East of Ten Acre Lane and TH4 (Housing Mix and Type), confirm they have no adverse comments on the plan.

5. No representations were received from Homes England or Thorpe Park Resort in relation to Policy TH2(iii). The Environment Agency were unable to provide specific comments on the plan due to resourcing issues but directed the Steering Group to published guidance they had prepared in partnership with Natural England, English Heritage and the Forestry Commission. Sport England and Natural England had no comments but directed the Steering Group to their respective Standing Advice to NP groups.

6. Highways England commented that in relation to any site allocations, they should be consulted when these applications come forward and detailed Transport Assessments are submitted that fully assess the impact of the developments on the Strategic Road Network and Local Road Network.

7. Historic England (HE) welcome the opportunity to comment on the Pre-Submission Plan but state they are disappointed that the 'Heritage and Character Assessment' excludes evidence from the Surrey Historic Environment Record. Section 5 of the

Sustainability Appraisal Scoping Report does however acknowledge the numerous archaeological discoveries in the area. HE also welcome the recognition in the allocation policies of the influence that heritage assets will have on the scale and layout of development although they suggest more could be done by the SG, with the help of the RBC Conservation Officer, to better understand the significance of these assets. They also support the principle of Policy TH6 that identifies a number of non-designated heritage assets.

8. Various departments of Surrey County Council submitted comments. These comments reflect their role as Highway Authority, Mineral and Waste Authority, Flood Risk Management, Environmental Enhancement and Heritage and Historic Environment teams. They make a number of observations and are supportive of the strong heritage thread that runs through the Plan, particularly with regard to archaeological heritage. Where appropriate, their suggested modifications have been addressed in the policy to which they relate.

9. Tarmac Trading Ltd confirm they own land outside the neighbourhood area and have interests in:

- Land to the north of Thorpe Industrial Estate and,
- Land at Longside Lake (partially within the designated Virginia Water Neighbourhood Area to the west of the M25).

They state that linkages with these sites should be acknowledged in the neighbourhood plan, but as these areas fall outside the designated area these are matters for RBC and the Local Plan to consider. A neighbourhood plan can neither support or oppose development that takes place beyond its designated area. As is acknowledged practice, a neighbourhood plan Examiner will recommend the deletion of any proposals in a Plan that fall outside the designated boundary.

10. Urbana Planning OBO Simco Homes make extensive comments on policy TH2(i) and the neighbourhood plan in general. They state that the Thorpe Neighbourhood Plan (TNP) "must be viewed within the wider context of the emerging Local Plan", but they fail to acknowledge that the preparation of the TNP has considered the 'reasoning and evidence' of the new Local Plan as is described in paragraph 3.4 of the Pre-Submission version. This is entirely consistent with Planning Practice Guidance (Paragraph: 006 Reference ID: 61-006-20190723). Barton Willmore OBO Cemex UK Properties Ltd also make comments on Policy TH2(iv) and both representations are addressed below.

11. The examination of TNP will take place soon after the adoption of the Runnymede 2030 Local Plan. However, the current consultation on the main modifications provides considerable certainty as to the policies that will eventually be adopted.

12. it is recommended that Section 3 of the TNP (Planning Policy Context) is updated to reflect the most relevant strategic and non-strategic policies of the new Local Plan (given the TNP will be examined once adopted) together with the most relevant policies of the 2001 Local Plan which they will replace. It is also recommended that the Plan E policies map is replaced to illustrate more clearly the effect of the replacement of saved policy GB2 by the new Local Plan Policy SD1. The revised map is included in the Appendix B to this report for this purpose.

13. Minor editing and clarification will be dealt with separately as a matter of course for all documents. The summary analysis of the remainder of the representations is provided in respect of each policy below, together with recommendations on making modifications for the final version of the Plan:

TH2(i): Land of Rosemary Lane Coltscroft

14. Simco Homes make extensive comments on policy TH2(i) and submit an alternative scheme to that proposed by this allocation. They assert that the site has a far greater capacity than identified by the policy. The alternative scheme comprises 23 market and 10 affordable homes together with a 72 bed Care Home facility. They comment that the neighbourhood plan's own Housing Needs Assessment indicates a housing need in excess of RBC's latest housing trajectory, although they qualify this by conceding that the HNA provides an unconstrained figure, and they contend that as a result, the neighbourhood plan is failing to plan positively to meet its needs and that their alternative scheme submitted would assist in this endeavour. Their comments fail to acknowledge RBC's own capacity assessment in the Strategic Land Availability Assessment which assumes a site capacity of 24 dwellings and that greater capacity could be deemed to be overdevelopment which would not reflect the character of the local area. Their submission was prepared prior to the refusal of application RU.18/1838 on this site.

15. It is recommended that the supporting text to policy TH1 and the introductory and supporting text to policy TH2 and TH2(i) are updated to improve clarity of housing need. It is also recommended that the alternative residential/care home scheme is assessed as an option in the Sustainability Appraisal (SA). The SG are also advised to submit comments on the proposed amendments to the alignment of the Public Footpaths that cross this site (FP52 and 53) to ensure their proposals to enhance pedestrian and cycle connectivity in policy TH7 are not undermined.

16. The Simco Homes submission also challenges a number of detailed aspects of the policy which, amongst other things, relate to access, the size of the green amenity space, and that primary consideration will be given to homes suitable for first time buyers/renters. They do however state in response to the neighbourhood plan consultation that "the development of the site can be undertaken in a policy compliant manner". They also reiterate the change in the flood risk status of the site and include a reference to their application RU.18/1838 for 83 dwellings which has since refused by RBC.

17. The SG should note the extensive comments made by Simco Homes, the eight grounds for refusal of application RU.18/1838, the Green Belt Villages boundary review at Coltscroft/Croft Farm/Elmside and West End Farm and its conclusions (see Appendix A) and the amendment to the Flood Risk Boundaries. It is recommended that no significant changes to the disposition of the land uses are necessary but that the supporting text is updated to reflect these changes and the SA updated accordingly.

18. Historic England recommend further recognition is needed of the archaeological assets recorded in the area. **It is recommended that an additional clause is added to policies TH2(i) and TH2 (iv) to reflect this advice; as follows:**

'A desk based archaeological assessment is undertaken, and where appropriate a site evaluation to establish the significance of potential heritage assets'

TH2 (ii) Woodcock Hall Farm

19. It is recommended that the supporting text is updated to reflect the change to the flood risk status of the site and the SA updated accordingly.

TH2 (iii) Land South of Coldharbour Lane, Thorpe Park Farm

20. No response was received from Thorpe Park Resort (the site owners) to confirm the availability of the site for development in the Plan Period. As the land cannot be allocated unless it's availability is confirmed, **it is recommended that the allocation is deleted in its entirety, Policy TH2 (iv) renumbered TH2(iii) and the SA and HRA Reports updated accordingly.**

TH2 (iv) Land East of Ten Acre Lane/North of Coldharbour Lane

21. Barton Willmore submitted a number of technical assessments in support of the allocation. These documents include a 'Landscape Appraisal and Green Belt Review', a 'Green Belt Exceptional Circumstances', a 'Heritage Assessment' and a 'Deliverability Statement'. Given the sites past use, Barton Willmore also provide a commentary on the site's history of gravel extraction and its restoration to grassland as required by SCC and described below. They recommend two minor amendments to the policy, in respect of the housing types and the treatment of boundary trees.

22. It is recommended that the policy is modified to reflect these changes with a reference to the Local Housing Needs Assessment added to item (b) of the policy to reflect Planning Practice Guidance which makes clear that that where neighbourhood plans 'contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need' .

23. Surrey CC, in their role as Minerals and Waste Authority, confirm they no longer have any minerals and waste interests within the Plan area. They confirm the Land at Norlands Lane (to the north of the allocation site) is filled with non-inert materials and apart from the access area and strip of access road to the Coldharbour Lane site, it is in non-mineral control. They also confirm that Land at Coldharbour Lane is filled with inert materials and is now in its third year of aftercare, which is expected to be completed by 2022, and is no longer of minerals interest.

24. It is recommended the supporting text is updated to reflect the latest minerals position and the 'Existing Minerals and Waste Site' designation is deleted from Plan F; the Thorpe Constraints Plan.

TH4: Housing Mix and Type

25. RBC provide detailed comments on the current wording of the policy to provide consistency with the emerging Local Plan and the amendments proposed in the main modifications (Policy SL20 MM39). They also suggest further commentary is

provided in the supporting text on the conclusions of the AECOM Thorpe Housing Needs Assessment (HNA) to reduce ambiguity and to avoid potential conflict with LP Policy SL20, which they confirm is strategic in nature.

26. The HNA concludes that given local incomes across Runnymede, the smallest area for which data is available are relatively high, there is no significant need for social rented housing in Thorpe. In this context, we would recommend that the forum discuss with RBC whether the proposed target of 70% affordable/social rent housing (MM39) is appropriate, or whether policy TH4 could place greater emphasis on 'build to rent' which the HNA suggests would be more appropriate to meet the needs of Thorpe. 'Build to Rent' falls within the NPPF Annex 2(a) definition. Delivery of 'build to rent' type housing may also, for example, fall within scope of the Runnymede Investment Programme.

27. It is recommended that amendments are made to the policy to clarify its intent in terms of affordable housing requirements and the need to focus of provision on the supply of 2 and 3 bed houses. The SG are advised to obtain detailed comments on the conclusions of the AECOM Housing Needs Assessment from RBC and the flexibility available to adjust the housing requirements set out in Policy SL20 (MM39). This is to ensure that the needs set out in the HNA which are not currently met by the market in Thorpe, may be secured while remaining compliant with NPPF Annex 2. The response from RBC should inform any additional modifications necessary to policy TH4 and supporting text.

TH5: High Quality Design

28. Surrey CC consider more needs to be made of the importance of local views or vistas. **It is recommended that the 4 key views identified by the SG are suitably evidenced, their location added to the Policies Map, and the name of each view added to the policy.**

29. Surrey CC also suggest the suite of building materials noted as being sympathetic to local character is not particularly comprehensive nor locally distinctive. The pallet of materials described in the policy reflects those contained in the Heritage and Character Assessment to which it would appear SCC may not have reviewed. The supporting text to the policy makes clear that the policy should be read in conjunction with this assessment. **It is recommended that an additional reference to the AECOM Heritage and Character Assessment is added to the supporting text.**

TH6: Local Heritage Assets.

30. In parallel with the preparation of the AECOM Heritage and Character Assessment and Heritage note, RBC have been updating their own heritage evidence base. This update included a review of non-statutory heritage assets across the Borough. To ensure consistency with that work and the saved policies of the Local Plan, Policy TH6 should be updated to provide a clear picture of the status of the various assets and the evidence that justifies their inclusion in the policy.

31. It is recommended that the policy and supporting text that was included in the Pre-Submission plan is replaced in its entirety in the Submission Plan with the following:

TH6: Local Heritage Assets

The Neighbourhood Plan identifies the following buildings and structures as non-designated heritage assets by way of their positive contribution to the character and heritage of the area:

- i. Thorpe Post Office and Stores;***
- ii. The Lych Gate, Thorpe Cemetery*;***
- iii. Woodcock Farm, Green Road;***
- iv. The Red Lion public house*;***
- v. Thorpe War Memorial*;***
- vi. The Old Pound Enclosure, Thorpe Park Farm*;***
- vii. Forge Cottage, Green Road.***

Development proposals that will result in the loss or substantial harm to a non-designated heritage asset will not be supported, unless it can be demonstrated that the benefits of the development outweigh the significance of the asset.

The village has an attractive historic environment with 37 statutory listed buildings (See Plan B and Fig 5.1 of the SA Scoping Report), around half of which fall within the Thorpe Conservation Area. The policy identifies non-designated heritage assets for the application of new Local Plan Policy EE8. The Thorpe Heritage and Character Assessment (AECOM, May 2017) describes the value of the first four assets as positively contributing to the understanding of the character and heritage of Thorpe. The assets marked with an asterisk are also included in the Runnymede Draft Local List consultation (May 2019).

Saved policy BE13 (Locally Listed Buildings) of the Local Plan Second Alteration (2007) designates Forge Cottage; the Red Lion Pub; and the Old Pound Enclosure. These assets have been included in this policy to ensure all assets remain part of the development plan when the new Local Plan is adopted. The policy therefore seeks to provide clarity on the status of all these assets to ensure that development proposals acknowledge and take into account their local value

TH7: Green and Blue Infrastructure

32. Surrey CC highlight the opportunity to improve the connection between the land to the north of Coldharbour Lane and to link the parkland with the Lower Thames Scheme. In addition, the Runnymede Access Liaison group (whose comments are addressed in in the Consultation Statement) recommend all opportunities are taken to improve safe access on foot to the village facilities from all the proposed sites.

33. It is recommended that the GI Network Plan is updated to illustrate the 'opportunity' for a connection with the Lower Thames Scheme and additional pedestrian/cycle connections are created to extend the existing RoW network to create new safe links to the village facilities and particularly the schools.

TH11: Water Infrastructure and Flood Risk

34. Thames Water confirm their support for policy TH11 in relation to impacts on the sewerage network and are keen to liaise with developers to discuss their proposals ahead of the submission of any planning application. Where necessary they would seek phasing conditions to ensure that development is not occupied until any necessary sewerage network upgrades have been delivered in line with Policy SD6 of the new Local Plan. They have assessed all sites and do not envisage any sewerage concerns. They also note that they are the sewerage undertaker not Affinity Water.

35. The supporting text should be updated to reflect the need for developers to liaise with Thames Water prior to submission of any planning application. The text should also be corrected to reflect the roles of Thames Water and Affinity Water.

Summary

36. The majority of the statutory consultee and landowner representations that have been received support the intention of the Plan. It is considered that only minor modifications will be necessary to improve the clarity and application of the policies. Once the proposed modifications from this report are made, and improvements to supporting evidence finalised, including the Sustainability Appraisal and Habitat Regulations Assessment, it is recommended that the Thorpe Neighbourhood Plan can proceed to submission without further consultation.

37. The Steering Group should also complete their schedule of comments from the community and append this report and the response to the community comments to the Consultation Statement.

Appendix A – AECOM response to SA/SEA comments

The aim of this Appendix is review and respond to consultation responses received as part of the two consultations to date:

- Consultation on the SA Scoping Report (March / April 2019; N.B. select stakeholder organisations only, in line with the regulatory requirement);
- Consultation on the Pre-submission Plan and SA Report (July / August 2019).

In respect of the second consultation, only one consultee made comments dealing directly with the content of the SA Report; however, several other consultees made indirect or passing references, and these are picked-up in the table below. Also, the table below responds to certain key points raised in respect of the spatial strategy (i.e. the approach to site allocation), and in particular points raised in respect of the key sites that were presented as a variable across the Growth Scenarios that were a focus of the SA Report (and remain a variable across the Growth Scenarios that are a focus of appraisal within this SA Report Update), namely Coltscroft (ID32) and Land East of Ten Acre Lane/North of Coldharbour Lane (ID44).

Please note that, for reasons of brevity, consultee comments are summarised in the table below, rather than reproduced in full.

Consultee / comments received	AECOM response
Historic England	
There is a need to interrogate the Surrey Historic Environment Record (HER).	The HER is considered as part of the appraisal of Growth Scenarios and the Draft Plan.
Recommend discussions with the County Archaeological Service	It has not been possible to engage directly; however, there was the ability to make comments through the pre-submission consultation.
The widespread operation of gravel extraction across the plan area in the relatively recent past is likely to have impacted the historic environment both through the loss of archaeological remains and change in historic landscape character, including features such as hedgerows, woodland and field systems. It may therefore be considered that the area's historic character is denuded, with potential for cumulative impacts.	This point is noted as part of the updated discussion of the historic environment baseline presented in Appendix II.
Land off Green Road, Woodcock Hall Farm (5 to 10 homes) is sensitive given the non-designated heritage asset of Forge Cottage, hence there is a need to specify what the most appropriate scale and alignment of buildings would be, as well as building materials.	This point is discussed as part of the Draft Plan appraisal presented in Section 9.

Land off Coldharbour Lane is sensitive, hence there is a need to go further than just requiring a heritage statement. There is a need to discuss the site's development on the affected listed buildings with the Borough Council's conservation advisor in order to develop a better understanding of the potential impact and either including a more specific requirement that addresses those impacts by guiding the design of development, or considering whether the allocation is suitable.

This point is discussed as part of the Draft Plan appraisal presented in Section 9.

Natural England

NE is satisfied with the SA scope.

Noted with thanks.

Runnymede Borough Council

When seeking to understand the baseline situation there is a need to: recognise that the southwestern part of the neighbourhood area falls within a 5km buffer of the Thames Basin Heath SPA (TBHSPA); take account of the RBC Air Quality Assessment; review the Historic Environment Record; and review the Surrey Historic Landscape Characterisation.

Addressed as part of the updated discussion of the baseline presented in Appendix II.

Appraisal should give due consideration to noise (noting the M25 constraint), housing (with reference to affordability in the neighbourhood area), infrastructure assets (TASIS for example) and mineral resources.

Addressed as part of the updated discussion of the baseline presented in Appendix II.

Comments from a local resident

The draft Plan is currently only allocating 24 houses on the Colscroft land and is looking at the Ten Acre Lane site to be taken out of the Green Belt in order to accommodate additional housing. The logic that led to this decision on which the need to take Green Belt land is questioned.

The matter of how many homes to allocate at Coltscroft (ID32) and Land East of Ten Acre Lane/North of Coldharbour Lane (ID44) was a focus of the Growth Scenarios appraisal within the SA Report, and a focus of the Growth Scenarios appraisal within this report.

It is also highlighted that only 2 options for the site at Colscroft have been considered in the SEA (i.e. no hybrid). The Plan should consider a hybrid allocation Site ID32 (c), of say, 45 mixed 2-3 bedroom housing at the Colscroft site, along with greater integration to adjoining green infrastructure (namely Frank Muir Field). This would help to reinforce the use of the FM Field. It would also provide a more appropriate use of the land and conformity with density of urban area housing discussed in the Local Plan. It would also negate the need to take Green Belt.

The possibility of a hybrid scheme (e.g. in the region of 45 homes) is discussed within Section 5 (Establishing the Growth Scenarios); however, as no such scheme is being promoted by any of the interested parties, it was determined to be 'unreasonable' to examine a scheme of this nature as part of the Growth Scenarios appraisal.

If this currently known data is applied to the Forum's own methodology (SEA Tables 5.1 and 5.2), this shows options at Colcroft as the more favoured site to that of Ten Acre Lane. It shows ID32(b) would not necessarily be prematurely discounted by the Forum as is the case in the Pre-Submission document. This calls into question the whole logic of first using ID 44.

It is important to note that it is not the aim of the Growth Scenarios appraisal to identify which scenario performs best overall, but rather to explore the pros and cons of the competing scenarios. A decision on which Scenarios performs best overall must be made by the plan-maker, after having weighed up the pros / cons.

Evidence gathered from the consultation in 2017 showed a desire to maintain the openness of the land at Ten Acre Land along with the most negative comments on housing received at the consultation event clearly sign-posting that that housing at Ten Acre Land was not favoured.

The matter of maintaining the openness of this land is discussed under the 'landscape' heading, both as part of the Draft Plan appraisal and the Growth Scenarios appraisal.

Urbana Planning obo Simco Homes (Coltscroft, Rosemary Lane)

There is no evidence to suggest that retaining open space within the Coltscroft site will assist in terms of minimising noise pollution.

Yes, there is a need to apply caution in respect of any such suggestions.

The amenity greenspace within the Coltscroft site has been identified as falling within the settlement boundary, which indicates limited value.

As explained within the Green Belt Villages Review Stage 2 Update (January 2018; see pages 20 to 22), the amenity green space was drawn within the Inset boundary not because of any judgement about its value but because "there is no defensible boundary between Coltscroft and Elmside". The most defensible boundary would either have to be the existing extent of Policy GB2 (option 1) or the Thorpe Bypass (option 2). Following a detailed discussion on this point on pages 20 to 22 of the Green Belt Villages Review, RBC concluded that:¹

"On balance, it is considered that the need for sustainable development outweighs the protection of the Green Belt in this instance, having regard to Green Belt purposes, and therefore it is considered that the most defensible boundary which would endure beyond the plan period would be the Thorpe Bypass. This does not mean that inclusion within the village should see the whole of the area developed and this will need to be considered in other Local or Neighbourhood Plan policies. Further, in placing the boundary up to the Thorpe Bypass it would be logical to include West End Farm within the village boundary. It is therefore recommended that Option 2 is taken forward."

Flood risk data is out of date

Yes, this SA Report Update has been prepared in light of the updated flood risk data.

¹ See runnymede.gov.uk/article/15546/Green-Belt-Villages-Review

Appendix B – Replacement for Plan E

