

Summary of representations received by Runnymede Borough Council on the Thorpe Neighbourhood Plan 2015-2030 (Submission Plan - June 2020) as part of the Regulation 16 consultation

(As submitted to the independent Examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act)

Consultation dates: Tuesday 7th July - Tuesday 18th August 2020.

Please note: All the original representation documents are included in the examination pack. The table below is a summary of the 11 representations received so will not be verbatim.

Ref no.	Consultee	Summary of comment
1	Avison Young on behalf of National Grid	<ul style="list-style-type: none"> • Confirmed that National Grid has no comments to make in response to this consultation. • National Grid indicated that it would help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment. It also wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Therefore, National Grid indicated that it ought to be consulted on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.
2	Highways England	<ul style="list-style-type: none"> • Highways England have no comments. • However, Highways England indicated that the strategic road network (SRN) is a critical national asset which it works to ensure is operated and managed in the public interest. It will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M25 and M3 motorways.
3	Natural England	<p>Natural England made the following comments to further strengthen the environmental policies in the Thorpe Neighbourhood Plan:</p> <ul style="list-style-type: none"> • Natural England note that development within this Neighbourhood Plan will follow Runnymede Local Plan's requirements for

		<p>both Thames Basin Heaths and South West London Waterbodies Special Protection Areas (SPAs). In terms of Thames Basin Heaths, Natural England expect the mitigation to be in form of both SANG and SAMM, as outlined in the Retained South East Plan Policy NRM6. This will need to be explicit within this Neighbourhood Plan.</p> <ul style="list-style-type: none"> • When delivering biodiversity net gain, Natural England has recently published the Biodiversity Metric 2.0 which can be used to measure gains and losses to biodiversity resulting from development. Natural England advise for this metric to implement development plan policies on biodiversity net gain. Natural England are pleased to see policy inclusion of biodiversity net gain for all development within the plan. • Natural England recommend keeping green space within villages and across developments in order to maintain connectivity of wider ecological networks and to help the health and wellbeing of residents in built-up areas. They make reference to paragraphs 170, 171 and 174 of the NPPF. • Natural England recommend reviewing their Annex A for guidance on how to find priority species and habitats in the Thorpe neighbourhood area. For further information they refer to paragraph 174 of the NPPF.
4	St Mary's Church, Thorpe	Registered their support for the NP.
5	Woolf Bond Planning on behalf of Burwood Rumsby	Wrote in support of the Plan and the potential to deliver a further two dwellings on the land off Rosemary Lane at either end off Old Farm Close.
6	Lichfields on behalf of Thorpe Park Resort (a company forming part of Merlin Attractions Operations Limited (Merlin)	<p>A number of observations are made, these include:</p> <ul style="list-style-type: none"> • Policy Number discrepancies are picked up. • Thorpe Park Resort agrees that as acknowledged in paragraph 3.12, Thorpe Park is a tourist attraction that is an important part of the local economy.

		<p>However, it is important to note that site is a theme park which operates under a D2 use class 'assembly and leisure'. Its facilities are available for use to paying guests, but the Resort including its lakes does not provide social or community infrastructure (in the traditional sense). The theme park use (retention and enhancement) is however provided for through Local Plan Policy IE4 'The Visitor Economy'.</p> <ul style="list-style-type: none"> • Given the status of Thorpe Park as a major tourist attraction Merlin are concerned that Thorpe Park is wrongly identified as a community facility and as drafted policy TH9 does not contribute to the achievement of sustainable development. They state that references to Thorpe Park Resort, and Thorpe Lakes as community facilities should therefore be deleted. • Instead should the Neighbourhood Plan wish to provide support for the retention, improvement, enhancement and expansion of Thorpe Park and its lakes as a major tourist attraction this should be done through a separate policy in the Neighbourhood Plan supported by Local Plan Policy IE4 'The Visitor Economy' or Local Plan Policy IE4. Thorpe Park would be happy to discuss such a policy in more detail. • Thorpe Park Resort agrees to the identification of the Nursery Pre-school, as a community facility which provides community infrastructure/education and childcare which is protected by Policy SD6 'Retention of Social & Community Infrastructure'. Given the changes to the use class order from 1 September 2020 they assume the policy will be reviewed to address the changes to the use classes. • They state that paragraph 2.13 notes: <i>"The RBC Strategic Flood Risk Assessment of the emerging Local Plan (SFRA 2018) confirms Thorpe Park experiences flooding and is an important area of the Thames floodplain."</i> They indicate that this section of the Neighbourhood Plan should note that Thorpe
--	--	--

		<p>Park has an operational flood compensation scheme that has been agreed with the Environment Agency which includes compensation areas that create flood storage in a flood event and that allows development to be compensated for in flooding terms. This is an important factor in the development of Thorpe Park.</p> <ul style="list-style-type: none"> • They state that the flood plan included at page 13 is only a high-level flood plan which does not reflect the Thorpe Park compensation areas agreed with the Environment Agency. • The Neighbourhood Plan should either note this is a general plan which is not accurate at a detailed site level or provide an updated plan showing the detailed levels with differentials between zones 3a and 3b. They would be happy to provide a plan showing the approved compensation areas. • Paragraph 4.5 notes <i>“Following the Regulation 14 Stage it became apparent that land at Thorpe Park Farm (ID38) would not be available in the Plan Period and the land was omitted from further consideration”</i> Thorpe Park did not appreciate there was a need to re-confirm the site continues to be available and viable as part of the Regulation 14 consultation, given they had already done so over the years via RBC and the SHLAA Call for Sites which is to cover the period to 2030. • They confirm that as noted in the SHLAA, Thorpe Farm is available for development as previously confirmed to the Thorpe Neighbourhood Forum by Thorpe Park. References to Thorpe Park Farm not being available for housing development should be deleted and it should continue to be identified as a housing site in the Neighbourhood Plan and in the early review of the Local Plan. • Paragraph 2.12 – refers to the wetland bird interest and ecology of the Thorpe Park No.
--	--	--

		<p>1 Gravel Pit SSSI. As a point of clarification, they consider the Neighbourhood Plan should note that the enhancements have been achieved through the Ecology Management Plan that Thorpe Park agreed with Natural England.</p> <ul style="list-style-type: none"> • The Neighbourhood Plan identifies a Green and Blue Infrastructure network in Policy TH7. The policy defines opportunities to enhance the network and requires all development proposals that lie within, or adjoin the network, to consider how they may improve it or contribute to its effectiveness, or at the very least not undermine its integrity. Thorpe Park agrees with this approach which is consistent with local and national policy. The Neighbourhood Plan also notes that there may be an opportunity to upgrade Monks Walk and provide cycle access (paragraph 5.54i). Thorpe Park supports sustainable travel and would support this proposal in principle assuming that there were no adverse impacts from a security and safety perspective on Thorpe Park’s operations. • Paragraph 5.9: notes that <i>“As a result of the Insetting [from the Green Belt] a number of land parcels identified in the RBC Strategic Land Availability Assessment 2018 (SLAA) will be released from the Green Belt including ID32 (Coltscroft), ID2 (Woodcock Hall Farm) and ID38 (Thorpe Park Farm) and their suitability for allocation has been considered along with other options.”</i> They state the removal of part of Thorpe Park Farm from the Green Belt has now been confirmed through the adoption of the Local Plan and this has been supported by Thorpe Park.
7	Barton Wilmore on behalf of Cemex	CEMEX owns land to the east of Ten Acre Lane/ north of Coldharbour Lane (identified as Site ID44 (north)) (‘the Site’). This site has an emerging allocation within the TNP to provide a country park, multi-use community area, changing/ toilet facilities, an extension to the

		<p>Cemetery and a car park, the delivery of which would be facilitated by circa 40 new private and affordable homes (draft Policy TH2(iii)).</p> <p>CEMEX welcomes the preparation of a neighbourhood plan for Thorpe and the inclusion of its Site as an allocation however there are elements of the evidence submitted in support of the allocation where greater weight ought to have been given to in the SA Update. Notwithstanding, CEMEX agree with the growth scenario selected by the Forum.</p>
8	Heaton Planning on behalf of Tarmac Trading Limited	<p>Tarmac own land around the designated neighbourhood area:</p> <ul style="list-style-type: none"> • Land to the north of Thorpe Industrial Estate – which continues to be actively promoted for employment development; and, • Land at Longside Lake (partially within the designated Virginia Water Neighbourhood Area). <p>Clearer identification of green infrastructure networks beyond the Neighbourhood Area, including Tarmac’s landholdings north of the Industrial Estate and at Longside Lakes is required. Tarmac state that the Neighbourhood Plan only recognises the influence of land beyond its designated area in a historic context rather than a proper acknowledgement of sustainable opportunities for the wider area which should be properly recognised, particularly as the draft Neighbourhood Plan makes no positive provision for employment growth within its policies.</p>
9	Urbana Town Planning on behalf of Simco Homes	<p>There is very significant support for the principle of bringing forward the Simco site for development through a residential allocation. However, it is considered that there remains reasonable capacity to deliver more of the OAN within the subject site on Rosemary Lane. It is therefore asserted that, alongside the other more technical points relating to the subject site, the dwelling capacity of the proposed allocation in Policy TH2(i) should be increased.</p>

10	Savills on behalf of Thames Water	<p>Thames Water support Policy TH11 of the Plan in relation to the 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 SD5 of the Runnymede 2030 Local Plan.</p> <p>They state that at this stage it is not envisaged that the proposed development sites will result in any infrastructure concerns in relation to the sewerage network. However, the impacts will depend on a number of factors including the final scale of development, timing of delivery, point of connection to the network. Where upgrades to the sewerage network are required the timescales for delivery should not be underestimated with upgrades taking from 18 months to 3 years to plan and deliver.</p> <p>They indicate that any necessary upgrades to the network would be funded through the Infrastructure Charge and delivered by Thames Water. Further information is available on their website at: https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>
11	Surrey County Council (SCC)	<p>SCC first comment addresses the proposed site allocation in Policy TH2 (iii), which is 'Land South of Coldharbour Lane, Thorpe Park Farm'. This site allocation is part of a larger area of land that has been previously worked, including the Manor Lake. The Minerals and Waste planning Authority (MWPA) restoration and enhancement team are still progressing the site through an agricultural aftercare phase, therefore the residential development proposed on the site is stated to be contrary to the conditions for the site.</p> <p>SCC state that although the statement in paragraph 2.7 regarding the land at Norlands Lane is correct, there remains gas management and infrastructure issues which the County Council still have an interest in.</p>

		<p>The Norlands Lane site has changed hands and they believe the new owners have been in contact with members of the Neighbourhood Plan Forum, with regards to future uses for the site. The MWPA restoration and enhancement team consider there could be an opportunity to link all three areas – Coldharbour Lane, Norlands Lane and the River Thames Scheme. Community benefits could be delivered by extending the wider open space provision across to Norland’s Lane (subject to landowner agreement) linking in the River Thames Scheme, rather than limiting the provision to just Coldharbour Lane.</p> <p>They state that the site allocation within policy TH2 (iii) is part of a larger area of land that is safeguarded within Policy MC6 of the Surrey Minerals Core Strategy Development Plan Document. The safeguarding of the site seeks to prevent development occurring that would otherwise sterilise the underlying mineral resource. The MWPA is beginning the review of our current minerals plan that will include an assessment of the suitability of ongoing safeguarded sites.</p>
--	--	--