

BY EMAIL: planningpolicy@runnymede.gov.uk

Planning Policy Team
Runnymede Borough Council
Runnymede Civic Centre
Station Road
Addlestone
KT15 2AH

29491/A3/IP/AJ
17 August 2020

Dear Sir/Madam

**THORPE NEIGHBOURHOOD PLAN – REGULATION 16 CONSULTATION
REPRESENTATIONS OF CEMEX UK OPERATIONS LIMITED**

We write on behalf of CEMEX UK Operations Limited ('CEMEX') in respect of their landholding to the east of Ten Acre Lane/ north of Coldharbour Lane, Thorpe and in response to the consultation on the Submission Thorpe Neighbourhood Plan ('TNP').

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 Cemetery and a car park, the delivery of which would be facilitated by circa 40 new private and affordable homes (draft Policy TH2(iii)).

The Site was previously developed for gravel extraction and has now been restored pursuant to the agreed restoration scheme. It is currently laid to grassland.

CEMEX has actively engaged in the preparation of the TNP and with the Thorpe Neighbourhood Forum and has promoted the allocation of its land to assist in meeting the needs, aspirations and objectives of the community. CEMEX's Site presents a unique opportunity within the Neighbourhood Area to facilitate the provision of community infrastructure, for which local need has been identified, in proximity to the historic core of the Village and focus of community activity around the Church and Village Hall. This is in addition to much needed new homes in an accessible location, well connected to the heart of the Village.

CEMEX supports the allocation of the Site through the TNP and provides the following comments to assist the local planning authority and examiner in assessing the TNP:

Green Belt

The Site is currently located within the Green Belt.



Registered in England
Number: 0C342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
F/ +44 (0)118 943 0001

Prior to the adoption of the Runnymede 2030 Local Plan in July 2020, all of Thorpe Village was 'washed over' by Green Belt. Through its review of the Green Belt, Runnymede Borough Council ('RBC') assessed the contribution Thorpe Village makes to the open character of the Green Belt and found that it was not necessary for the Village to remain within the Green Belt. Pursuant to NPPF paragraph 140, Thorpe Village has, therefore been removed from the Green Belt through the adoption of the RBC Local Plan.

At a strategic level, RBC has identified exceptional circumstances through its Local Plan to review the Green Belt boundary and identify land for release to meet borough-level development needs. RBC did not consider it appropriate for Thorpe to make a contribution to addressing such wider development needs and as such the revised Green Belt boundary was drawn tightly around the existing built-up area of the Village based upon the findings of the Green Belt review as opposed to the need to release land to meet identified needs.

Accordingly RBC has acknowledged that the TNP may identify local needs that cannot be met within the Green Belt boundary defined through the Local Plan and has signalled support for the TNP to make detailed, non-strategic amendments to the Green Belt boundary at Thorpe pursuant to NPPF (2019) paragraph 136 (see paragraph 5.30 of the RBC 2030 Local Plan).

In support of such detailed amendments to the Green Belt boundary, the TNP must identify exceptional circumstances pursuant to NPPF paragraph 136. These are set out in the TNP Green Belt Exceptional Circumstances Note (June 2020) ('the EC Note'). The exceptional circumstances identified at Thorpe are similar to those accepted by the Inspector for the RBC Local Plan and include the heavily constrained nature of the borough/ neighbourhood area, limited capacity of previously developed land outside of the Green Belt and identified need for new market and affordable homes. Locally specific to Thorpe are also protection of historic character, need for facilities for sports and young people/ children, and public car parking to reduce pressure on parking within the historic village core. Together it is agreed that these factors amount to exceptional circumstances for a non-strategic review of the Green Belt boundary at Thorpe.

Thorpe has been removed from the Green Belt in the RBC Local Plan as a response to the government policy on washed over villages. In setting the new boundary it is important that the boundary endures. To do so, it must be set having regard to local needs which are identified through the TNP. Such needs can constitute exceptional circumstances.

Once exceptional circumstances have been demonstrated, the question then is which land to release. The NPPF (paragraph 138) advises that consideration should first be given to previously developed land and/ or land that is well served by public transport. The ability of land to provide compensatory improvements to the environmental quality and accessibility of land remaining within the Green Belt must also be considered. NPPF paragraph 139 provides guidance on defining the location of a revised Green Belt boundary.

The EC Note provides a helpful summary of the NPPF and how a revision to the Green Belt boundary to release circa 1.76ha at the Site for residential development, to facilitate the delivery of a range of public facilities, positively responds. CEMEX supports and agrees with the response to the NPPF.

CEMEX would add that the Site will deliver a range of facilities for which a local need has been identified, such need being locationally specific to the historic core of the Village in proximity to the Church, Village Hall and Cemetery, and which will assist the long-term sustainability of the Village (NPPF paragraph 139(a)). Moreover, in combination with the other residential allocations proposed, in excess of the housing requirement identified by RBC for Thorpe (pursuant to NPPF paragraph 65) will be delivered which will ensure that the Green Belt boundary will not need to be revisited in the longer term. In short, that it will endure beyond the Plan period (NPPF paragraph 139(e)).

In addition, the majority of the Site (some 87%) will remain within the Green Belt. This land is to be provided as a country park alongside a multi-use community area, toilet/ changing facilities, a playground and a public car park. The environmental quality of this land will be improved through landscape enhancements and it will be publicly accessible, addressing in full the requirements of NPPF paragraph 138 for compensatory improvements to land remaining within the Green Belt.

Sustainability Appraisal

The Submission TNP is supported by a Sustainability Appraisal of the Thorpe Neighbourhood Plan: SA Report Update (June 2020) ('the SA Update').

The SA Update refines the previous growth options based on feedback received at the Regulation 14 consultation stage and on updated information on availability (for example). The growth scenarios assessed provide a range of growth options with Scenario 1 providing allocations sufficient to meet the RBC housing requirement for Thorpe of 89 dwellings. Scenario 2 provides the highest number of homes at 138, albeit a significant proportion of these would be C2 (residential institutions) rather than C3 (dwellings). Scenario 3 provides for 129 new homes. A further scenario not assessed within the SA Update would be a 'no allocations' scenario. However, it is clear that this would perform poorly against the sustainability criteria and would not provide for the needs/ address the objectives of the community.

The SA Update identifies Scenario 3 as the highest performing against the sustainability assessment criteria. CEMEX agrees with this conclusion and the reasoning by the Forum for selecting this as the preferred growth scenario (section 7.1). Whilst the use of clear assessment criteria assists in providing a framework, as is inherent in assessments of this nature, matters can be interpreted and assessed differently. In this regard, CEMEX makes the following comments on the SA Update assessment (with reference to Table 6.1 and Section 9):

Historic Environment

The SA Update assesses Scenario 3 as having a minor negative impact on the historic environment. This is owing to concerns over the location of a new access to the Site (ID44 (north)) from Coldharbour Lane (paragraph 9.20). It should be noted that a field access currently exists to the Site from Coldharbour Lane. Whilst the new access would be located further to the west, this is to offset it from the farm access on the southern side of Coldharbour Lane for highway safety reasons. The existing access would be reinstated and the new access designed in accordance with Policy TH2(iii) having been informed by both highways and heritage assessment. It is considered that the impact should be considered neutral in this regard.

With regard to the more general comments on the Thorpe Conservation Area, it ought not be assumed that development within the Conservation Area will result in harm. The assessment rightly notes that the TNP policies have been developed to mitigate such harm. Moreover, the Site, in particular, will provide a new public car park that will reduce pressure on parking within the historic core of the Village in proximity to listed buildings. The Forum identify this as a positive effect that, when weighed in the balance, ought to result in an overall neutral impact on the historic environment.

Landscape

Uncertain effects are identified in respect of the impact of Scenario 3 on landscape. The principal focus being on the Site (ID44 (north)) as the other two sites fall within the Local Plan settlement boundary (inset from the Green Belt). A Landscape and Visual Assessment and Green Belt Review (May 2020) have been prepared in support of the allocation of the Site. This finds that the part of the Site proposed for residential makes a limited contribution to the wider landscape given the level of screening and

containment from existing vegetation and built form. There are no landscape designations on the Site and it is not identified in the Assessment as having any particular landscape qualities. The residential element of the Site is well related to existing built form at the junction of Coldharbour Lane with Ten Acre Lane and on the opposite sides of these highways. Development in this area would balance the extent of built form on all sides of this key gateway junction into Thorpe and would appear as a logical extension to the settlement.

It is accepted that a small area of open land would be built upon and that this could be assessed as having a minor negative effect on landscape, the enhancement of the landscape on majority of the Site ought to be considered a positive effect which on balance result in a neutral effect. Given the technical assessments that have been submitted at earlier stages of the TNP preparation it is unclear why 'uncertain' effects have been identified.

Health & Wellbeing

Neutral effects have been identified for health and wellbeing for the preferred option: Scenario 3 despite the SA Update (see paragraph 9.40) identifying the provision of a pedestrian/ cycling route through the Site providing a safe route to the Cemetery as beneficial (there is currently no footway on Ten Acre Lane to the Cemetery). The Site would also provide new publicly accessible community/ sporting/ recreation facilities. These are clear positive effects that would not result in 'double counting' (see paragraph 9.41) and ought to be recognised as such in the SA.

Summary/ Conclusion

In summary, CEMEX welcomes the preparation of a neighbourhood plan for Thorpe and the inclusion of its Site as an allocation (Policy TH2(iii)). There are, however elements of the evidence submitted in support of the allocation that greater weight ought to have been given to in the SA Update. Notwithstanding, CEMEX agree with the growth scenario selected by the Forum.

CEMEX would wish to be an active participant in the examination of the TNP and engage in oral debate.

We trust this letter is of assistance. Please do contact the writer should you wish to discuss further.

Yours sincerely



ALEX JONES
Associate