



Land off Rosemary Lane, 'Coltscroft'

Representation to Submission Thorpe Neighbourhood Plan

Prepared by: CD
Client: Simco Homes Ltd
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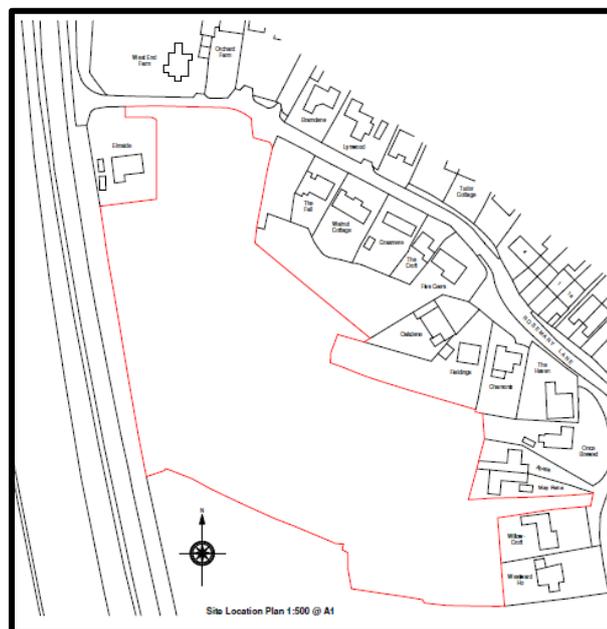
'LAND OFF ROSEMARY LANE, COLTSCROFT'

1.0 Introduction

1.1 The following report has been prepared by Urbana Town Planning Ltd on behalf of Simco Homes in relation to the site referred to above and its status within the 'Submission' version of the Thorpe Neighbourhood Plan. The report introduces the site, describes its status within the newly adopted Local Plan as well as the Neighbourhood Plan ('NP'), and makes various points pertaining to the soundness of the NP as far as it relates to the site in question.

2.0 Site and Location

2.1 Within the NP the site in question is referred to as Land off Rosemary Lane, Coltscroft and identified within Policy TH2 (i). Since the recent adoption of Runnymede's new Local Plan the site is no longer situated within the Green Belt but rather within the settlement area of Thorpe village. The site as it is now being put forward (indicated below) covers an area of approximately 1.6ha. It is located on the edge of the settlement of Thorpe, approximately 400m to the west of Thorpe's historic core and just to the east of the Thorpe by-pass and the M25 London Orbital Motorway.



2.2 Through most of the time within which both the Local Plan and the Neighbourhood Plan have been produced a relatively large area of the site has been located within Flood Zone 2. However, recent updates to Environment Agency modelling has amended this to find that the whole site and its immediately surrounding area is within Flood Zone 1.

2.3 A large part of the site is currently used as a builder's yard (in accordance with certificate of lawfulness for existing use *RU.04/0238*) and this use incorporates

the open parking and storage of materials and several outbuildings. Other than this the site contains the dwelling of *Coltscroft* and its residential curtilage, as well as an area of grass and scrub to the north and west. To the north and east on the Thorpe 'side' of the site are relatively low density residential dwellings of various ages and styles. To the south is the Frank Muir Memorial Field, which is identified as being an Area of High Archaeological Potential.

3.0 Development Potential

3.1 In light of the refusal of the previous application for the site in its previous form new plans are emerging that are considered to be more in alignment with the direction of the NP. These plans are subject to ongoing pre-application discussion with Runnymede Council and a version has been appended to this document.

3.2 While that is the case, it is still stressed that the site is suitable to accommodate development on a greater scale than that indicated in the consultation document. This representation is therefore made on this basis, and in some respects with more particular reference to the specifics of the evolving form of the proposals for the site.

4.0 Relevant Planning History

4.1 *RU.01/1008 – Withdrawn – Outline application for the erection of 43 dwellings with vehicular access of Rosemary Lane and associated car parking and open space provision following demolition of 'Elmside'.*

4.2 *RU.02/0736 – Refused – Outline application for the erection of 43 dwellings with vehicular access off Rosemary Lane and associated car parking and open space provision following demolition of 'Elmside' (Resubmission of RU.01/1008).*

This application was refused for several reasons. Primarily the proposals were deemed to be inappropriate development interrupting the openness of the Green Belt. In addition a lack of submitted information was found to insufficiently address the requirement to demonstrate planning policy justification, to provide affordable housing, to provide an appropriate mix of housing and to address the nearby high archaeological potential. Further, concerns were raised regarding perceived amenity/overlooking issues, highways/access, acoustics and the more general design and layout of the proposals.

4.3 *RU.07/0382 – Refused – Extension to internal access road and a new turning area and the repair and maintenance of the existing internal access road.*

This application was refused, with the given grounds being inappropriate development in the Green Belt and causing an undesirable increase in intensity of

the existing use, harming the amenity of nearby dwellings. In addition a lack of a suitable Flood Risk Assessment was asserted to be a failure to demonstrate that the proposals would not increase flood risk elsewhere. It was granted after appeal with the Planning Inspector overturning all reasons given for refusal.

4.4 ***RU.18/1838 – Refused*** – *Outline application for the erection of up to 83 dwellings and associated access.*

As referred to above this recent application for residential development on the site has now been refused. The reasons given for refusal included: location of site in the Green Belt (which no longer applies), relationship with Thorpe, heritage impact, noise impact, surface water management issues.

5.0 **Runnymede Planning Policy Context**

5.1 As part of its statutory duty as a Local Planning Authority, Runnymede Borough Council is responsible for looking forward and setting the level of housing and employment provision that is needed in the Borough up to the year 2035, within the Local Plan. As part of doing this numerous important questions have been explored and considered within the process of formulating the Local Plan, which, as established, has now been formally adopted by Runnymede Borough Council

5.2 In relation to the site in question, as mentioned it is no longer within the Green Belt, but equally it does not hold a specific residential allocation within the Local Plan. It should be noted, however, that it is identified as a non-allocated SLAA site that is 'suitable for housing', and through this forms part of the housing land supply within Component J of Table 4, 'Expected Housing Delivery 2015 to 2030', in the adopted Plan. It is therefore important that any development that is brought forward on the site represents an efficient use of the land in question. It is equally acknowledged that in determining any application for development of the site RBC will need to place a very strong degree of weight on the NP, with the precise degree being consistent with its progress towards adoption and consistency with the Plan and the Framework. As a result this policy relationship remains critical, and open engagement with the remaining stages of the NP process will be sought.

6.0 Thorpe Neighbourhood Plan – Submission Version

6.1 As set out in the previous section, the Submission Version of the Neighbourhood Plan must now be viewed within the wider context of the newly adopted Local Pla, with the village and the site in question at Rosemary Lane being removed from the Green Belt. As a result, within this context there are certain points within the consultation document to which we wish to offer responses. Certain elements of these responses remain similar to views expressed at preceding stages of consultation where the same concerns remain, and other elements have evolved due to changes in the NP and associated context.

Policies TH1, TH2 + Local Housing Need

6.2 In principal relation to the site in question and our consideration that it should be more effectively used to accommodate a larger scale of development, the key elements of the NP relating to housing need and site allocations must be assessed. In this regard the above policies set out proposed site allocations alongside some general discussion of housing need.

6.3 More specifically, the position set out within these policies is informed primarily by AECOM's July 2018 Housing Needs Assessment, which projects that within the Neighbourhood Forum area there is a housing need of 188 dwellings over the plan period (to 2030). This is as opposed to Runnymede Borough Council's latest housing trajectory estimating the delivery of 89 net additional dwellings over the plan period. While it is accepted that the HNA figure is 'unconstrained' it is clear that more can be done in order to fulfil more of this objectively assessed need within the constraints that do exist.

6.4 As a result of the above a shortfall exists that is proportionally very substantial – 89 dwellings represents only approx. 47% of the OAN identified within the HNA. This therefore establishes a context in which if the Neighbourhood Plan is to plan proactively and positively for the delivery of the OAN in the NP area –as far as constraints allow– an increased number of dwellings must be planned for where possible. To this end it is asserted that the subject site has a greater capacity than currently indicated in the NP and this is discussed in the following section.

'Policy TH2(i) – Land off Rosemary Lane, Coltscroft'

6.5 A significant part of this assertion relating to the site's capacity relates to its physical state and constraints, based in part on the outline design evidence put together within the Neighbourhood Plan itself as well as its evidence base (Thorpe Village Illustrative Masterplan and Design Guidelines).

6.6 Within this context established by the NP, and the current application on the site, it is considered that in several respects Simco Homes' aspirations for development of the site already align with those set out as part of this consultation. The fundamentals of the design approach, in terms of form and what detail is referred

to at this stage, are similar. Rather, it is felt that it is the difference in extent of site coverage by development that prompts what differences exist, though this difference is much less within emerging designs following refusal of the previous application on the site.

- 6.7 In this regard certain points in the consultation document must be raised that, it is considered, lead to the differences that do remain between the respective aspirations of the TNF and Simco Homes. In justifying the NP's restriction on the level of development on the site, a key example is the reasoning for leaving an undeveloped buffer to the west of the site adjacent to the by-pass and the M25. As well as forming open space the NP claims that this area will help to protect the amenity of future residents from unacceptable levels of traffic noise. This is, objectively, not the case. Leaving the relatively small amount of open space will do little, if anything, to reduce noise here. Noise attenuation is almost without exception better achieved by physical form, hence why dwellings adjacent to major roads are often protected by acoustic barriers rather than, for instance, an arbitrary stand-off distance. In this case therefore it is not accurate for this to be held as a reason for leaving this area undeveloped, however even so as set out in the accompanying updated site layout a significant 'buffer' is now proposed.
- 6.8 Furthermore, the consultation document and its evidence base refer to this space repeatedly as a green/landscape 'buffer' at the edge of the Green Belt. This is referenced specifically within point 'ii' of TH2(i). Functionally, the Green Belt itself is in essence (and almost literally) a green 'buffer' at the edge of settlements. If it was the case that this strip of land in question needed to retain this function, then the correct planning approach would be for it to have been retained as Green Belt within the Local Plan. This has not been done. It has been proven and agreed at Examination of the Local Plan that exceptional circumstances exist to justify its removal from the Green Belt - it is objectively suitable for removal from this function as indeed it has now been so through adoption of the Local Plan. As such, to then attempt to restrict it in the way proposed within the consultation document is at odds with the approach of RBC, the Local Plan and the Inspector's assessment of it. Therefore, while some element of open space must surely be included as part of any scheme brought forward on the site, it is asserted that it is not at all appropriate for this whole area to be formally restricted by the proposed policy.
- 6.9 Beyond this, and with specific reference to point 'i' of TH2(i), the following requirement is objected to: 'primary consideration [must be] given to first time buyers and those looking to rent their first home'. It is not clear through what mechanism(s) such a requirement would be secured, or indeed whether there would be any recourse to deviate from this approach should it be found either through viability evidence or other market experience or evidence that this approach is not feasible. It is therefore considered that this is not an appropriate requirement to place on any development of the site. Instead the site should be subject to

standard RBC policy-compliant affordable housing requirements, or at least alternative wording should be formulated.

- 6.10 In addition to this, point 'iv' seeks to impose a requirement for any vehicular access to the site to be provided from Rosemary Lane, 'with no vehicle access to be created onto the Thorpe By-Pass'. There is absolutely no valid reason for this constraint to be put in place as part of this policy. Indeed, the Neighbourhood Forum will be aware that the previous application on the site proposed sole vehicular access via the by-pass, which was approved by the Highways Authority. It must be stressed that the emerging NP must be NPPF-compliant and, in the absence of any valid planning or technical highways justification for imposing this restriction, it is not appropriate.
- 6.11 Further to this, it is recognised that within this policy para 5.21 refers to the refused application and 'the importance of retaining the integrity of the village by avoiding opening up access to the Thorpe Bypass.' It remains unclear as to how reinstating this historic vehicular access would damage the integrity of the village. On the contrary, it is most strongly asserted by Simco Homes that the suggested alternative of directing additional vehicular traffic through the village via Rosemary Lane would in fact be damaging in this way. It is considered to be a matter of fact that increasing vehicular traffic along Rosemary Lane and through Thorpe is in no way conducive to the goal of protecting the integrity of the village. The consultation document's approach would be contrary to the vital principle of planning for more sustainable places and seeking to achieve design that helps residents to make more sustainable travel choices. In this case Simco's approach to site access would make it more convenient to access the village's services and facilities by foot/bike and less convenient by car. The alternative that is being pushed within the consultation document would do the opposite and represents poor planning.
- 6.12 This is without even considering the physical and technical difficulties presented by exacerbating existing access issues along Rosemary Lane, which includes a number of 'pinchpoints' constraining traffic movement. Simco Homes' proposed arrangement avoids this, avoids the harm caused by additional vehicle movements along Rosemary Lane and includes proposals to increase the safety and permeability of pedestrian and cycle movement through and around the site and Rosemary Lane. This access arrangement is therefore far superior and has already been agreed in principle with Surrey County Council. As a result it is again stressed that TH2(i) should in no way seek to impose the access restriction as suggested under point 'iv'.
- 6.13 In summary of the above discussion it can be said that several of the factors that currently form Policy TH2(i) cannot be justified in their current form. The result of this is the conclusion that the site in question is capable of accommodating a greater number of dwellings than currently indicated in the consultation document.

Viability

- 6.14 As requested by the Neighbourhood Forum, and in accordance with the Framework and PPG, it is also Simco Homes' intent to offer reassurance (as far as possible at the current time) that the development of the site in question can be undertaken in a policy compliant manner with respect to affordable housing provision and developer contributions. Owing to the historic uses of some parts of the site a certain amount of remediation may be required which may represent abnormal costs of development, however this remains subject to more extensive intrusive investigation. Notwithstanding that the fact remains that the site is deliverable in terms of its suitability, availability, achievability, and viability.

7.0 Conclusions

- 7.1 In accordance with Simco Homes' previous activity relating to the site in question there is very significant support for the principle of bringing forward the site for development through a residential allocation. However, as discussed, 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.

