

THORPE NEIGHBOURHOOD PLAN

The Thorpe Neighbourhood Forum's (TNF) response to the request for clarification in the Examiners note dated 14th September 2020 is set out below.

The Forum thank the Examiner for bringing these matters to their attention and for the opportunity to provide clarification. Although the questions have been directed to the Forum, the Forum has provided the opportunity for the Local Planning Authority (RBC) to make any additional observations to the Examiner, should it wish.

The Forum would welcome the opportunity to provide additional clarification if the Examiner finds its response unclear, or if the response raises consequential 'Basic Conditions' matters.

Para. ref.	CLARIFICATION	FORUM RESPONSE	RBC OBSERVATIONS
4	I would like to offer the Forum the opportunity to comment on the representations that were submitted as part of the Regulation 16 consultation. It is only necessary to respond to those matters which offer comment or objection, as it sees fit.	Please refer to the Forum's comments in Appendix A	The Council can confirm that an amended representation has been received from Surrey County Council in response to the Regulation 16 consultation dated 4 th September. As such the representation from Surrey County Council dated 18 th August should be disregarded. The original and amended representations are both displayed on the Council's website for completeness
Documentation Issues			
5,6,	It would improve the clarity of the proposals, if the maps could be presented at a larger scale. It would also assist if the definition of the OS base map could be enhanced to identify which properties and land are covered by designations. I would recommend that the maps should be presented at A4 size,	The resolution of all plans referenced have been enhanced and resized to a minimum of A4 scale as requested. Plan D has been updated to reflect the Environment Agency's revised flood boundaries now included on RBC's GIS system. The flood boundaries were amended midway during the Reg 14 consultation	The Council has no additional comments to make in response to these points over and above the response provided by the Thorpe Neighbourhood Forum.

	namely Plans A , B, C, D, and E- plus The Thorpe Constraints Plan, Thorpe Scenario 2, both Policies Map and the Green and Blue infrastructure Plan.	<p>period. And Plan E now reflects the adopted Local Plan (ALP).</p> <p>The following updated files are forwarded to the examiner in response to this request:</p> <p><u>TNF Doc 2 Plans A to D</u> Plan A – the designated area Plan B – the Conservation Area Plan C - Environmental designations Plan D – Flood Risk</p> <p><u>TNF Doc 3 Plans E to G</u> Plan E – Green Belt Inset Plan F - Thorpe constraints Plan Plan G - Thorpe Scenario 2</p> <p><u>TNF Doc 4 Policies and Inset Maps</u> Policies Map Policies Inset Map 1 Policies Inset Map 2 Policies Inset Map 3 Green & Blue Infrastructure Plan</p>	
7	It would be helpful if the 2 Local Green Spaces were included on the Policies Map and also the non-designated heritage assets , in both cases so as to define the extent of their coverage, which is particularly an issue in terms of Woodcock Farm and also the Old Pond Enclosure and the LGS at The Gower.	<p>Please refer to new Policies Inset Map 3</p> <p>The Inset Map clarifies the locations of the two Local Green Spaces and the location of the non-designated heritage assets and their footprints, including the designations proposed at Woodcock Farm TH6(iii), and The Old Pound Enclosure TH6 (vi).</p>	The Council has no additional comments to make in response to this point over and above the response provided by the Thorpe Neighbourhood Forum.
8	I would also request that the location of the key views as described in Policy TH5 and show	Please refer to new Policies Inset Map 2	The Council has no additional comments to make in response to this point over and above the response

	<p>the particular viewpoint to be protected, be also added to the Policies Map.</p>	<p>The Key Views Note in the evidence base has also been updated to improve clarity regarding views along Coldharbour Lane and to correct inconsistencies in the numbering of views. (please refer to TNF Doc 5).</p> <p>If acceptable to the Examiner, the TNF suggest the Key Views Note could be inserted in the Plan at a new Appendix A after the 'Schedule of Evidence'.</p> <p>In the interests of accuracy, the description of the following view on page 35 of the Submission Plan should be corrected to read:</p> <p>ii.d South easterly view from Green Road Mill Lane across Mercers Field towards St Ann's Hill.</p>	<p>provided by the Thorpe Neighbourhood Forum.</p>
9	<p>There appears to be a discrepancy in the Policies Map, which currently shows the residential areas in the north east corner of the plan area, to the west of Chertsey Lane as being within the Green Belt on the Policies Map, which is not consistent with the Local Plan .</p>	<p>Please refer to the updated Policies Map</p> <p>The main Policies Map has been updated to correct this inconsistency. The TNF notes that Plan E and Plan F of the Submission Plan illustrates the correct boundary.</p>	<p>The Council has no additional comments to make in response to this point over and above the response provided by the Thorpe Neighbourhood Forum.</p>
10	<p>Policy TH5 refers to Character Areas A and B - could the key to the Policies Inset Map be amended to refer to Character Areas rather than High Quality Design Areas? Does the neighbourhood plan offer design guidance or expectations for the areas outside these two areas?</p>	<p>Policy TH5 establishes a local context to enable the design quality and design merits of development within the two character areas to be addressed "throughout the evolution and assessment of proposals" (NPPF §128) to ensure high quality consents are secured.</p> <p>Outside of the identified character areas, principally the residential area to the west of Chertsey Lane, the TNF consider Policy EE1 (Townscape and Landscape</p>	<p>In addition to the response provided by the Thorpe Neighbourhood Forum, the Council notes that the Thorpe Policies Inset Map 1 has been updated so that the key refers to Character Areas rather than High Quality Design Areas as requested by the Examiner.</p>

		<p>Quality) of the adopted Local Plan (ALP) provides adequate design guidance. For areas in the Green Belt, Green Belt policy will also apply.</p> <p>Given the Government attaches great importance to achieving 'well-designed places' and the significance that 'design' is currently playing in the planning discourse, the TNF invites the Examiner to insert a reference to the National Design Guide in the final paragraph of policy TH5, to alert applicants to the Guide, given there appears to be no reference within the ALP.</p> <p>TH5: "Development proposals will only be supported where they comply with <u>the expectations set out in the National Design Guide and</u> other relevant policies and do not..."</p>	
11	<p>Policy TH5 seeks to retain or re-provide <i>incidental open space</i>- what I am not clear is whether these areas could or should be identified on a map, so there is clarity as to whether specific pieces of land are included – does it include only public land or can it include private land, and even land within a residential curtilage. Are these areas different to the areas covered by Policy TH7 covering the green Infrastructure Policy Map shown as light green?</p>	<p>These incidental areas of open green space are in addition to the areas shown as light green on the GI policies map and too numerous to map individually. The TNF welcomes and agrees with Natural England's Regulation 16 response in recognising the ecological and health value of incidental green spaces in urban areas (whether in public or private ownership) that act as 'stepping stones' in maintaining wider ecological connectivity.</p> <p>The Examiner will note that in overall terms, there is an under provision of open space, sport and recreation facilities in the designated area as described in the Green and Blue Infrastructure Note in the evidence base (which in turn cites the Runnymede 2035 Open Space Study, Feb 2017).</p> <p>The intention of Policy TH5 is therefore to seek to maintain the character of the area including these</p>	<p>The Council has no comments to make in response to this point.</p>

		<p>incidental spaces; whether public, private or within a residential curtilage. The TNF consider this approach will support other complementary and increasingly important policy aspirations, such as the need to reverse the decline in biodiversity by requiring a 'net gain' from all new development (Policy TH7). The ALP, for example, states at paragraph 7.58 that nearly 12% of Surrey native wildlife is believed to have already been lost.</p> <p>The TNF consider this aspect of policy TH5 complements the objectives set out in ALP Policy EE1 and SL25.</p>	
Site Allocations			
12	<p>I see from the concept plan that the proposed allocation set out in Policy TH2(i) shows access coming in from the south, which presumably, will require the demolition of the substantial property, Coltscroft and the current access to the north is shown as a pedestrian route only. Is there a reason that the vehicular use of the current access to the north is discounted? Is the Highway Authority agreeable for a shared access to be proposed for this number of units?</p>	<p>The Examiner will note this site has an extensive planning history. Numerous residential schemes have been proposed over the last 20 years or so, the most recent for 83 dwellings having recently been dismissed at appeal.</p> <p>The appeal decision is attached at TNF Doc 6. The Examiner will note the strength of feeling expressed by the local community in their representations; against the scale of the proposal, the proposed means of access, the loss of the existing amenity green space, the effect of the layout on the RoW network and the conflict with proposals in TNP7.</p> <p>In all previous planning scenarios, the land interest has proposed to demolish the residential property 'Coltscroft' and the concept plan accompanying Policy TH2(i) reflects this position. No response to the contrary has been received in either the Reg 14 or Reg 16 submissions.</p>	<p>The Council has no comments to make in response to this point.</p>

		<p>The site access strategy adopts the principle of 'filtered permeability' to the northern access, to prevent residents using the most narrow section of Rosemary Lane, while ensuring that section provides a choice of routes and remains attractive for walking and cycling for local journeys in support of 'active travel'.</p> <p>In answer to the Examiner's final question, the Highways Authority have confirmed that:</p> <p>"In relation to the accesses to the site from Rosemary Lane itself, the CHA considers that there is no "in principle" objection to either of these, as long as appropriate design and construction standards can be met" (please refer to TNP Doc 7).</p> <p>The TNF have commissioned a review of site access options and the transport note prepared (please refer to TNP Doc 8) confirms that satisfactory vehicle access can be provided from Rosemary lane to the south-east of the site, subject to the approval of the Highways Authority at planning stage, in line with the requirements of the Policy TH2(i).</p> <p>The Report also recommends the implementation of a 20MPH zone to complement other sustainable travel proposals in the TNP. This recommendation reflects the measures contained in the Local Infrastructure Improvements (non-statutory proposals) listed in paragraph 6.4</p>	
13	Another issue which applies to the allocations, is that the policy wording refers to "primary consideration to be given to first	The policy approach is based on the analysis in the Local Housing Needs Assessment which indicates there is a hidden need between the evidence at	The Council has no comments to make in response to this point.

	<p>time buyers and those looking to rent their first home” or in the case of Woodcock Hall Farm, the provision of “single storey downsizer housing”. Is the expectation that residency on these sites should be restricted, in some way, by planning condition or planning undertaking or is the approach to be as suggested in Policy TH4, which refers to the buildings being <i>suitable</i> for these particular sectors of the housing market will be <i>encouraged</i>?</p>	<p>Borough level which informs ALP Policy SL19 & 20 and that at (sub ward) neighbourhood level.</p> <p>The TNF welcome RBC’s Reg. 16 comments on the revisions to Policy TH4, and is acutely aware of the shortfall in housing to meet the needs of people living and working in the designated area whose needs are not currently met, and in the case of the latter, who have to commute from elsewhere in the Borough or beyond.</p> <p>Policy TH4 has taken the opportunity to refine the approach in the ALP to take account of local circumstances in support of the objectives of the TNP. To this end the allocation policies and supporting text aim to reflect evidenced local needs and indicate the suitability of each site in meeting these needs – whether this be for smaller family housing or downsizer housing that may in turn free up market housing.</p> <p>The policy wording is intended to be sufficiently flexible to reflect the final paragraph of Policy TH4, but applying reasonable prescription to the policy expectations in terms of housing type, acknowledging the needs of different groups in the community as required by NPPF §61. The intention of the policy is to steer applicants and case officers in the direction intended and to secure this through an appropriate planning undertaking.</p>	
14	<p>In terms of the Woodcock Hall Farm allocation, are the barns and other wooden buildings covered by the farms’ proposed designation as a non- designated heritage asset in Policy TH6 or does that just refer to</p>	<p>The proposed non-designated heritage asset reference in Policy TH6(iii) refers only to the weatherboarded barn under slate roof, the rear of which faces onto Green Road. The policy does not designate the Farmhouse.</p>	<p>The Council has no comments to make in response to this point.</p>

	<p>the farm house. It appears from the Character Assessment that they are included , yet the policy seems to imply that redevelopment and hence their removal is a clear option.</p>	<p>For clarity, the footprint of the barn has been included on Policy Inset Map 3.</p>	
15	<p>I appreciate the arguments being advanced in favour of the site covered by Policy TH2(iii), but I would like to understand how that site to be released from the Green Belt was chosen. Was there a systematic review of other sites, which adjoin the built up area considered and could other sites provide similar benefits?</p>	<p>As outlined in the Site Assessment Report and Sustainability Appraisal (SA), the TNF undertook a considered and systematic review of available sites in determining their spatial options. This was informed by the LPA's SLAA 2018 and local knowledge of submissions by a number of land interests to the emerging Local Plan. The views expressed by the local community and the SA also informed the final proposals.</p> <p>To explain this further. The TNF was cognisant of the opportunity presented by § 136 in NPPF 2018/2019 and the 'non-strategic' nature of the application of § 136 that applies to neighbourhood planning and described in paragraph 5.27 of the ALP. (note: not para 5.30 quoted in the Main Modifications dated Jan 2020).</p> <p>The TNF held several meetings with agents representing SLAA sites ID42, ID44 and ID220 during 2017 and 2018 (as indicated in the Consultation Statement). All had submitted proposals in their representations to the Local Plan.</p> <p>ID42 had been promoted for a scheme of approximately 270 dwellings and open space (please refer to TNF Doc 9 masterplan). Aside from the impact of the proposal on the openness of the Green Belt, clearly the proposal was 'strategic' in nature. After a number of meetings with the agent,</p>	<p>The Council can confirm that in addition to SLAA sites 42, 44 and 220, the only other 4 Green Belt sites promoted through the SLAA which are located in the Thorpe Neighbourhood Area, and which do not already have planning permission are sites ID 56, 286, 339 and 340.</p> <p>Site 56 which covers an area of approx. 6.74ha is located in the north eastern part of the Neighbourhood Area; over 800m from the urban area of Thorpe Village. It is partly located in the functional floodplain. The remainder of the site is located within flood zone 3a. The site is also partially located in the safeguarded area for the River Thames Scheme.</p> <p>Site 286 which covers an area of approx.0.61ha is located in the north eastern part of the Neighbourhood Area; over 850m from the urban area of Thorpe Village. It is entirely located in the functional floodplain.</p> <p>Site 339 was not considered in the 2018 SLAA due to the timing of its promotion to the Council. Instead it will</p>

		<p>emails were not returned, and contact ceased. It was not then possible to consider whether the owner would make the land available for a more modest 'non-strategic' option.</p> <p>ID44/220 had been jointly promoted as an extensive mixed use proposal covering 100 acres (please refer to TNF Doc 10), also a 'strategic' proposal. Following meetings with the agent, it was agreed to separate the proposal to create a more modest option. The TNF were subsequently advised that the new landowner of ID220 is working with the Environment Agency in relation to the River Thames Scheme and has no further interest in progressing matters through the TNP.</p> <p>Both proposals were clearly 'strategic' in nature and neither were taken forward in the Local Plan. Given their scale, they would not fulfil the criteria established for neighbourhood plans in paragraph 136 of the NPPF, nor would they meet the additional site selection criteria applied by RBC (as described on page 25 of the Basic Conditions Statement).</p> <p>The other sites outside the proposed Inset boundary were not considered to provide the exceptional circumstances to justify their release from the Green Belt under the terms of the NPPF (§ 136 to 139) as they could not provide the extensive additional benefits provided by the site covered by Policy TH2(iii) and as set out in the 'Green Belt Exceptional Circumstances Note' in the TNP evidence base.</p> <p>Should the Examiner have any additional questions resulting from the above response, the TNF would welcome the opportunity to respond.</p>	<p>be considered in the Council's next SLAA (due for publication in 2021). The site is modest in size at approx. 0.3ha. The site is partially located in flood zone 2.</p> <p>Site 340 was not considered in the 2018 SLAA due to the timing of its promotion to the Council. Instead it will be considered in the Council's next SLAA (due for publication in 2021). However the site is modest in size (approx. 0.3ha) and is entirely located in the functional floodplain.</p> <p>The location of the SLAA sites are indicated on the Plan F Thorpe Constraints Plan and can also be viewed on the Council's rMaps system at: https://maps.runnymede.gov.uk/wbsite/maps/index.html under 'Environment and Planning'; 'Other layers'.</p>
--	--	--	---

16	<p>Has any thought been given to the possible phasing of the community benefits as once the housing site is removed from the Green Belt upon the making of the plan, then the policy presumption would be in favour of housing on that site as per Policy TH1? Is there a need for the policy to include reference to a phasing plan to ensure the other proposals are delivered in step with the housing?</p>	<p>The Site is under the single ownership of CEMEX UK Operations Limited ('CEMEX'). In response to the Examiners question, Cemex have advised that their intention is to bring forward a single planning application for permission to develop the entirety of the site in accordance with the emerging site allocation. They also advise that it is likely that the application will be submitted in outline but with access determined and a series of parameters proposed. It is anticipated that one of these will address the phasing and sequencing of the development and its various components.</p> <p>The TNF agrees with the examiner that a reference to phasing should be included in the policy for the reasons stated. The Examiner is invited to consider the following new clause be inserted to Policy TH2(iii) to address his question:</p> <p><u>“o: The development shall be implemented in accordance with a phasing and implementation plan to be agreed as part of a planning application, to ensure the timely provision of the non-residential uses, open space and supporting infrastructure.”</u></p>	<p>The Council supports the inclusion in the Thorpe Neighbourhood Plan of the additional text suggested by the Thorpe Neighbourhood Forum.</p>
17	<p>Can the Forum describe what criteria it used to determine which facilities should be protected as Community Facilities? In particular, I will need clear justification as to why the commercial facilities at Thorpe Park Resort are used by the Thorpe Community, as in my experience, this facility has a much larger catchment which serves a hinterland of at least an hour's drive.</p>	<p>The criteria the TNF used to determine the community facilities to include within Policy TH9 are reflected in the definition of 'Social and Community Infrastructure' described in paragraph 5.67 (page 46) of the ALP; including nursery, pre-school, primary and secondary education.</p> <p>The TNF accepts the view expressed by Thorpe Park Resort in their Regulation 16 submission and invites the Examiner to recommend deletion of Thorpe Park Resort from Policy TH9(iii).</p>	<p>The Council has no comments to make in response to this point.</p>

	Similarly, how does TESIS , which is described as a very private school, justify the proposed status as community facilities that need to be protected by neighbourhood plan policy?		
18	Does Runnymede Council have any views as to how this policy needs to be updated following the recently introduced changes to the Use Classes Order?	The TNF concur with the Council's comments, and is content with the modification proposed to Policy TH9 should the Examiner consider this appropriate.	<p>Given the response of the Thorpe Neighbourhood Forum to point 17 above, it is suggested that the definition of Social and Community Infrastructure as described at paragraph 5.67 of the ALP is inserted into the supporting text for policy TH9.</p> <p>It is then recommended that Policy TH9 is amended as follows:</p> <p>Title of policy: Amend to Social and Community Facilities</p> <p>Paragraph under the bullet pointed list of community facilities. Amend as follows:</p> <p>In addition to the provisions of relevant Local Plan policies, proposals to change the established use of a facility and its ancillary land must demonstrate that the land is no longer suited to any other D social or community use, <u>the definition of which is set out in the supporting text to this policy.</u></p>
19	How do Thorpe Lakes provide community facilities, beyond being part of the plan's Blue Infrastructure, protected by Policy TH7?	The TNF have contacted the operator at Thorpe Lakes and they are content for their facility to be removed from the list of community facilities. The TNF	The Council has no comments to make in response to this point.

		therefore invite the Examiner to recommend deletion of Thorpe Lakes from policy TH9(ix).	
20	Are any of the community facilities designated as Assets of Community Value?	No.	The Council concurs with the position set out by the Thorpe Neighbourhood Forum.
Policy TH11: Water Infrastructure and Flood Risk			
21	The Secretary of State in a Written Statement to the House of Commons dated 25th March 2015 stated that "neighbourhood plans should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings". I would welcome the views of the Forum and the LPA ,whether the requirements to achieve a water efficiency standard is indeed imposing such a technical requirement	<p>Affinity Water Services are the water supply undertaker for Thorpe. The 'Waterwise Toolkit' confirms that Thorpe lies within an area which suffers serious water stress.</p> <p>Whilst the TNF acknowledges the WMS dated 25 March 2015, as with a number of issues, the Submission Plan was prepared in the period prior to the adoption of the Local Plan. It therefore included several matters which have subsequently become adopted policy, this being one. Reference to the minimum water efficiency standards is now included within clause (e) of ALP Policy SD7: Sustainable Design.</p> <p>To avoid duplication, the TNF have no objection to the removal of clause (ii) from Policy TH11, which in any case also references the water efficiency standards established by the development plan in policy TH11 paragraph 2. However, the TNF invite the Examiner to consider whether the inclusion within the supporting text to the areas 'severe water stress' would alert applicants to the issue.</p>	The Council agrees that clause(iii) from Policy TH11 could be deleted given that it duplicates the water efficiency standard included in policy SD7 of the ALP, and in addition could be said to be imposing a technical requirement on applicants, contrary to the intention of the Written Statement dated 25 th March 2015.
22	Can the LPA confirm that the requirement to submit a Flood Risk Assessment is a requirement of the Local Validation Checklist?	The TNF has no further comments	The Council's validation Checklist can be viewed at: https://www.runnymede.gov.uk/article/15268/Check-what-you-need-to-submit

			Point 17 on pages 8 and 9 of the document confirms when a Flood Risk Assessment needs to be submitted alongside a planning application.
23	Can the Forum clarify how it sees the sequential approach set out in criteria iii would work – is it actually seeking an assessment of alternative layouts or is the existing national requirement to demonstrate that there are no alternative sites that could be developed based on the sequential approach to site selection in areas at risk of flooding?	<p>Clause (iii) of Policy TH11 was drafted prior to the Environment Agency's Flood Zone boundary amendments in November 2019, at which time 3 of the 4 sites proposed for allocation included areas in FZ1, 2 or 3 within their site boundary, and hence why a sequential approach was to be followed in the design and layout. All proposed allocations within the Submission Plan now lie within FZ1 and therefore this specific circumstance has fallen away.</p> <p>The TNF consider that the newly adopted Local Plan Policy EE13: Managing Flood Risk, now provides appropriate policy coverage to address this matter.</p>	The Council has no comments to make in response to this point.

Appendix 1 - Thorpe Neighbourhood Plan Regulation 16 Submissions

Forum Response:

Representation	TNF Response
Runnymede BC	The TNF welcome the positive response from the LPA and that amendments to Policy TH4 have satisfactorily addressed their Reg 14 comments. The TNF also welcome the LPA's positive statement regarding the application of NPPF paragraph 136 in respect of Policy TH2 (iii).
National Grid	Noted
Highways England	Noted
Natural England	<p><u>Policy TH10</u> first paragraph is already explicit in requiring SANG and SAMM mitigation. No further action considered necessary.</p> <p><u>Biodiversity net gain and reference to the Biodiversity Metric 2.0.</u> TNF recommend footnote 5 on page 37 of the Submission Plan is updated to include a link to the Metric.</p> <p><u>Connectivity and wildlife corridors</u> The TNF welcome NE's observations regarding the importance of green spaces in built up areas in maintaining wider ecological networks and to contribute to health and wellbeing. Please also cross refer to the response to question 11.</p>
St Mary's Church	Support welcomed
Woolf Bond Planning	The TNF have no comments to make on the merits of the proposal. The 2 additional dwellings proposed, if approved, are likely to be considered 'windfall' and contribute to the Thorpe housing requirement.
Litchfield's OBO Thorpe Park Resort	<p><u>Community Facilities:</u> In response to the Examiner's clarification question 17, the TNF are content for the Examiner to recommend the removal of Thorpe Park Resort from Policy TH9. Regarding Thorpe Park Nursery, the submissions supports the retention of the nursery in policy TH9, but suggest the policy is reviewed in the light of the recent changes to use class orders. The TNF is content to leave this to RBC to address in response to the Examiner's question 18.</p> <p><u>Flood Risk</u></p>

	<p>In the interests of accuracy, the TNF is content for paragraph 2.13 of the TNP to be updated by the insertion of a new 2nd sentence to read: <u>“Thorpe 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.”</u></p> <p>The flood map (Plan D) has been updated. For other strategic flood matters the TNF consider the ALP and the LPA's policies maps provide adequate coverage of these issues.</p> <p><u>Housing</u> Thorpe Park Resort did not respond to the TNF's invitation requests regarding availability and viability and submitted no response to the Reg 14 consultation; the Site Assessment Report accurately reflects this position. Neighbourhood Plans are obliged by Paragraph: 002 Reference ID: 10-002-20190509 to engage with landowners and vice versa.</p> <p>The Reg 16 submission states that <i>“Thorpe Park Farm is available for development (sic) 2026-28 as previously confirmed to the Thorpe Neighbourhood Forum by Thorpe Park”</i>. The TNF confirm to the Examiner that a number of attempts were made to contact Thorpe Park Resort following the Reg 14 consultation and their error was acknowledged by email in May 2020.</p> <p>As their representation indicates however, this does not preclude Thorpe Park Resort from either submitting a planning application for their site, now that it has been released from the Green Belt through the ALP, or putting forward their site to RBC in the Local Plan Review.</p> <p><u>Ecology and Nature</u> The TNF welcome their support for Policy TH7 (Green Infrastructure) and their in principle support for Monks Walk within the GI Network.</p>
Barton Willmore OBO Cemex	Noted and support welcomed
Heaton's OBO Tarmac	Noted that comments relate to land outside the designated neighbourhood area
Urbana Planning	Urbana Planning OBO Simco Homes make comments on policy TH2(i) and on the neighbourhood planmaking in general. The site at Coltscroft has an extensive planning history.

The submission states that the Thorpe Neighbourhood Plan (TNP) “must be viewed within the wider context of the emerging Local Plan”, but it fails to acknowledge that the preparation of the TNP has considered the ‘reasoning and evidence’ of the new Local Plan as is described in paragraph 3.3 of the Submission Plan. This is entirely consistent with Planning Practice Guidance (Paragraph: 006 Reference ID: 61-006-20190723).

The land interest submits a further proposal for the site for (what appears) to be approximately 35 to 40 dwellings or a yield of about 50% greater than the minimum required by the policy. The representation refers to the Local Housing Needs Assessment, but fails to acknowledge that the housing requirement for the Neighbourhood Plan, as defined by NPPF §65, is established by the ALP Policy SD1, and will be met and exceeded through the TNP allocation policies. There is no housing shortfall in the neighbourhood area as the representation asserts.

The representation also fails to acknowledge the terms of the ALP as they relate to Thorpe settlement’ ALP paragraph 5.27 states:

*“Thorpe Village will be removed from the Green Belt through this Local Plan, however given its position in the centre hierarchy, **the village is only considered to present limited opportunities for growth over the period of the Local Plan** which will be dealt with in a Neighbourhood Plan for the Thorpe area.” (TNF emphasis)*

Furthermore, while NPPF §122 requires the ‘efficient use of land’ it also requires this to be balanced with the ‘desirability of maintaining an areas prevailing character’ and other matters. The housing number proposed in Policy TH2(1) is a response to these criteria. RBC took a similar view of capacity given local character in their 2018 SLAA.

The new proposal submitted along with the representation conflicts with the fundamentals of the policy and the disposition of the land uses as defined in Policy TH2(i) and illustrated in the ‘concept plan’.

In this respect, the submission fails to acknowledge that the area of ‘amenity green space’ is identified as such in RBC’s Open Space, Sport and Recreation Study, and is a key land use component of TH2(i). The amenity green space was only removed from the Green Belt for reason of identifying an ‘enduring’ boundary. In this respect, the Examiner is directed to the discussion on Green Belt boundary options on page 21 and 22 of the [Green Belt Village Review Stage 2 Update \(January 2018\)](#) and its conclusions:

“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”.

Paragraph 6.8 of the representation is a direct contradiction of this conclusion. The study was tested through the Local Plan examination and Policy TH2(i) is “not at odds” with it, as asserted in paragraph 6.8.

The Basic Conditions Statement establishes that in the view of the TNF, the TNP contributes to the achievement of sustainable development in Thorpe and has done so without the need to encroach onto the land defined as ‘amenity green space’ in policy TH2(i). Furthermore, the alternative proposal put forward at Reg 16 stage has not been assessed through either the SA or the HRA.

The Examiner will also note that alongside Policy TH2(i), TH7 proposes to enhance pedestrian and cycle links by improving connectivity with Footpath 52 and 53 and their linkage to the local school (c200m), playing field and skate park (c100m), village shop (c300m) and pub (c450m). This is far from being in a relatively unsustainable location as has been asserted by the Highways Authority, but the submitted proposal would likely sever some if these links.

The TNP’s intention is to ensure that Policy TH2(i) guides development of this site to become an integral part of the village. The Examiner will note from his review of the supporting documentation and Consultation Statement that the community have strongly held views about this site which has extensive planning history. Their desire is to ensure access to the Thorpe bypass, which has never existed since its construction, should not lead to a ‘dormitory’ development or indeed a means of rat running through the historic village core.

National Planning Policy is explicit in this regard; “Planning Policies and decisions should aim to achieve healthy, inclusive and safe places...” (NPPF §91) and “...opportunities to promote walking, cycling and public transport use are identified and pursued” and “...patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places”(NPPF §102c&e).

	<p>Finally, the land interest has not challenged the viability or deliverability of the proposed policy. To the contrary, they confirmed in paragraph 6.14 of their Regulation 14 response that the site allocation policy TH2(i) was both deliverable and viable, as they were requested to do by the TNF to accord with the PPG on Viability (Paragraph: 002 Reference ID: 10-002-20190509):</p> <p><i>“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. In this case we are able to confirm with a relatively strong degree of certainty that this is the case. 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 <u>viability</u>.”</i></p> <p>The Examiner is directed toward the minor qualification to this Reg 14 statement in their Reg 16 submission. The TNF has been presented with no new evidence as to why this qualification was necessary.</p>
Thames Water	Support for Policy TH11 noted. TNF welcome the confirmation that at this stage the scale of development proposed in the TNP will not result in sewerage network concerns.
Surrey County Council	<p><u>Minerals and Waste</u></p> <p>The TNF note and welcome the amended Regulation 16 representation from SCC dated 4th September which supersedes the response dated 18 August, confirming that site allocation TH2(iii) Land East of Ten Acre Lane/North of Coldharbour Lane is no longer safeguarded for mineral purposes.</p> <p>The Examiner will be aware of the subsequent communications with the Highways Authority in relation TH2(i). (TNF Doc_7)</p>