Dear Ms Glancy,

Runnymede 2030 Local Plan Examination Matters and Questions For Stage 2 Hearings (Matters 8-11) Matter 9: Employment, Town Centres and Retail Policies (Policies IE1-IE13)

Matter 9.1: Together with the expectations for Longcross Garden Village in Policy SD10, do Policies IE1-IE3 provide a justified, positive and deliverable framework to meet the anticipated needs for employment development in the Borough up to 2030? Is the Plan sufficiently flexible to help meet the priorities of the economic development strategy as set out in paragraph 8.6?

We do not consider that Policy IE1 provides a justified, positive and deliverable framework to meet the anticipated needs for employment development in the Borough up to 2030.

Matter 9.2: In regard to Policy IE1 (Byfleet Road, New Haw), is the requirement for a minimum net addition of 20,000 sq m of floorspace likely to be compatible with measures that are yet to be defined to mitigate flood risk? Also, does the proposed modification (CD_001A) to the site boundary have any implications for the delivery of the allocation?

In the current form we consider that Policy IE1 (Byfleet Road, New Haw) does not meet the tests of soundness in terms of being justified, effective or consistent with national policy.

We and Runnymede Borough Council have recently agreed on an updated Level 2 SFRA for Policy IE1 (Byfleet Road, New Haw), for the allocation 20,000 sq m for business use.

This now shows a significant proportion of Flood Zone 3 and areas of 3b (functional floodplain) across the site. There is no indication of where Flood Zone 2 is.

We are concerned that there is not enough space in Flood Zone 1 to develop the required 20,000 sq m of floorspace. We would be supportive of development only in Flood Zone 1 at this site (Byfleet Road). We would expect Runnymede Borough Council to therefore revisit the sequential test to identify other sites, in Flood Zone 1, which could accommodate the shortfall.

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As shown in the updated Level 2 SFRA the proposed modification (CD_001A) to the site boundary increases the amount of Flood Zone 3b and 3. We understand this area is a proposed access route. We would not want to see any changes to ground levels within Flood Zone 3b.

Once again, thank you for contacting us. Our comments are based on our available records and the information submitted to us.

If I can be of any further assistance, please contact me directly.

Yours sincerely

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