Runnymede Borough Council Local Plan Examination – Matter 9 Statement

Our ref 04858/36/NT/SH
Date 25 January 2019
From Lichfields on behalf of Thorpe Park, a company forming part of Merlin Attractions Operations Limited

Matter 9: Employment, Town Centres and Retail Policies

1.0 Q.9.5. Overall, does the Plan set out a clear, justified and deliverable strategy for promoting the long-term vitality and viability of the Borough’s network of town and local centres? In particular:

a) Are the measures for locating and managing town centre uses as set out in Policies IE5 and IE6 justified and likely to be effective? And do Policies IE12 and IE13 provide a sound planning framework for local centres and individual shops and parades in the Borough?

1.1 We maintain our position (set out within our representations of 22 February and 29 June 2018) that the measures for locating and managing town centre uses set out under Policy IE5 requires amending.

1.2 The draft policy states that applications for main town centre uses (including leisure and entertainment, culture and tourism development i.e. including hotels/overnight accommodation) that are not proposed in the town/local centres will only be permitted where they pass the sequential test (as set out in the NPPF) and for other town centre uses (aside from retail) which propose more than 2,500sqm of floorspace, an impact assessment must be undertaken. The ‘only exception’ to this is noted to be “...where a class B1 use is proposed in a Strategic Employment Area as defined by policy IE2 or where a site has already been allocated for development through this Local Plan”.

1.3 This policy would clearly prevent development at the Thorpe Park site, which is an out-of-centre leisure and tourism site including overnight accommodation. This is entirely unjustified and is at odds with the approach the Council has taken to date, including granting permission for a 250-bed hotel on the site, which is linked to the theme park and therefore cannot be located in a town/local centre. The policy as drafted does not therefore allow for site-specific circumstances, where development must be delivered at a specific site such as Thorpe park to meet its need/purpose, other than within the Strategic Employment Areas.

1.4 It is suggested that one of two routes should be taken to resolve this fundamental issue with draft policy IE5:

1 Add another ‘exception’ to the sequential/impact assessment for main town centre uses, to refer to existing leisure and tourism attractions in the Borough, including the acceptability of additional hotel accommodation where this is provided in locations directly linked to these tourism/leisure attractions, serving visitors to, and the needs of, that attraction; or
2 Include reference under the ‘only exception’ to include the Major Developed Sites (MDS) within the Green Belt where, as set out under the relevant MDS policy, town centre uses may be considered acceptable. This would relate to our comments on Green Belt development and the Thorpe Park MDS (see Matter 11 Statement), ensuring that draft policy IE5 does not unjustifiably limit the Park’s future potential to deliver growth with associated economic benefits. The policy could be amended to state:

“The only exception will be where a class B1 use is proposed in a Strategic Employment Area as defined by policy IE2 or where a site has already been allocated for development through this Local Plan, including the leisure/tourism Major Developed Sites in the Green Belt (as set out under policy [add reference], including Thorpe Park [any others]) where town centre uses such as further leisure development and hotels are considered appropriate where they are related to the site’s existing use”.

1.5 Subject to the Inspector giving these comments detailed consideration, we will not be seeking participation in the oral part of the Examination on Matter 9 on 19th February.