Runnymede 2030 Local Plan
Public Examination

Response to Inspector’s Matters and Questions for Stage 2 Hearings
On behalf of Crest Nicholson and CGNU
(ID: 1990)

Matter 9
Employment, Town Centres and Retail Policies

January 2019
Runnymede 2030 Local Plan
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Matter 9: Employment, Town Centres and Retail Policies
Barton Willmore LLP on behalf of Crest Nicholson and CGNU

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1.0 INTRODUCTION

1.1 Barton Willmore LLP is instructed by Crest Nicholson (CN) and Commercial Union, General Accident and Norwich Union (CGNU) to submit this written Hearing Statement in response to the Inspector’s Matters and Questions for Stage 2 of the Runnymede 2030 Local Plan Examination. These representations expand upon the representations submitted on behalf of CN and CGNU in response to the consultations for the RBC Local Plan 2030 Regulation 19 Parts 1 and 2.

1.2 CN and CGNU own the former DERA site at Longcross, Surrey, which is proposed for allocation and removal from the Green Belt in the Runnymede 2030 Local Plan under Policy SD10 (Longcross Garden Village).

1.3 The site was designated by the DCLG (now Ministry of Housing, Communities and Local Government, MHCLG) as a Locally Led Garden Village (LLGV) in January 2017. Part of the north of the site to the north of M3 Motorway (the western edge, now referred to as ‘Longcross Park’) is designated as part of the EZ³ Enterprise Zone.
RESPONSE TO MATTER 9 - EMPLOYMENT, TOWN CENTRES AND RETAIL POLICIES

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.

9.1.1 Yes, taken together with criterion c) in Policy SD10, which clearly defines the quantum of additional employment floorspace and other commercial development allocated to LGV, Policies IE1 to IE3 are soundly based.

9.1.2 Paragraphs 8.7 and 8.17 of the plan refers to the strategic importance of LGV in helping to meet the anticipated needs for employment in the Borough up to 2030. Paragraphs 6.49-6.53 of RBC’s Employment Land Review (September 2016) (SD_002B) is also relevant and provides a good summary of the committed employment provision at LGV.

9.1.3 LGV will make a significant contribution towards RBC’s strategic economic ambition and the priorities contained within the economic development strategy. This includes the successful designation of part of LGV (identified as ‘Longcross Park’) which forms part of the EZ multi-site Enterprise Zone (EZ).

9.1.4 Marketing of the employment land at LGV is underway. Details can be viewed via: https://discoverlongcross.co.uk. CN & CGNU, together with their commercial agents, are in active dialogue with potential occupiers and it is anticipated that development proposals for new employment will come forward soon, within the first few years from the plan’s adoption.

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?

9.2.1 No comment.

1 RBC reference RU.13/0856
9.3 Is the designation of the Strategic Employment Areas and the provisions for their protection as such in Policy IE2 justified, positively prepared, consistent with national planning policy, and likely to be effective?

9.3.1 CN & CGNU are satisfied that the designation of Longcross Park as a Strategic Employment Area, identified within policy IE2 as ‘SEA2’, is sound.

9.4 Do Policies IE3 and IE4 provide clear, robust guidance for employment development elsewhere in the Borough and for the visitor economy?

9.4.1 No comment.

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 framework for local centres and individual shops and parades in the Borough?

9.5.1 For clarity, having regard to the requirements set out in criterion d) of Policy SD10, Policy IE5 should confirm that retail proposals at LGV will not be expected to be accompanied by an impact assessment. This should be provided either through LGV being identified as a ‘Local Centre’ or, alternatively, with a footnote added to 2nd bullet in the third paragraph of the policy which explains that LGV is exempt.

b) Are Policies IE7-IE10 based on robust evidence of retail and other town centre needs and are they likely to be delivered within the timings indicated in the policies? What is the practical distinction between these allocation policies and the development opportunities identified in Policy IE11? What is the basis for the timings set out in this policy?

9.5.2 No comment.