Local Plan Proposed Modifications Consultation
Comments Form

The best way to comment on the Proposed Main Modifications is using the below comment form.

Once completed, please send us your completed comments form by:

- E-mail to planningpolicy@runnymede.gov.uk or
- Post to Planning Policy and Economic Development team, Runnymede Borough Council, Civic Centre, Station Road, Addlestone, KT15 2AH

We must receive all responses by 11:59pm on Friday 21st February 2020. Any comments received after this cannot be accepted.

Introduction

Runnymede Borough Council is consulting on the following:

- Schedule of Proposed Main Modifications ONLY

The following documents are also published for information only:

- Schedule of Proposed Additional Modifications
- Proposed Main Modifications Sustainability Appraisal
- Proposed Main Modifications Habitat Regulations Assessment
- Proposed Main Modifications Equality Impact Assessment

How to comment

The Council is inviting comments on the Proposed Main Modifications from Friday 10th January 2020 until 11:59pm on Friday 21st February 2020. You can view the consultation documents at:

- https://www.runnymede.gov.uk/article/13869/Runnymede-2030-Local-Plan-Emerging-
- At Runnymede Civic Centre
- Local library locations in and around Runnymede

Comments can be made using this form and returned by:

E-mail planningpolicy@runnymede.gov.uk
Post or Hand Planning Policy and Economic Development team, Runnymede Borough Council, Civic Centre, Station Road, Addlestone, KT15 2AH
If you are completing this form electronically, please save this questionnaire to your computer using the Save As button on your toolbar, fill it in, and then e-mail it to: planningpolicy@runnymede.gov.uk.

**We must receive all responses by 11:59pm on Friday 21st February 2020. Any comments received after this cannot be accepted.**

Please note that any comments made verbally or anonymously cannot be accepted.

If you need help making comments or have any questions, please e-mail planningpolicy@runnymede.gov.uk or call Planning on 01932 425131.

**How comments will be used**

All the comments on the Schedule of Proposed Main Modifications will be sent to the Inspector carrying out the Examination so she can conclude her examination and make a final recommendation.

Representations should only relate to the changes contained in the Schedule of Proposed Main Modifications. Anyone that has made a representation to the Draft Local Plan consultations in 2018 does not need to make their representation again unless a new comment on the proposed Main Modifications is being made.

Copies of comments received during the course of the consultation will be made available for the public to view on the Council’s website.

**IMPORTANT**

Copies of comments received during consultation will be made available for the public to view on the Council’s website. **Comments therefore cannot be treated as confidential.** Personal details will be redacted prior to publishing. Data will be processed and held in accordance with the Data Protection Act 2018. Please see the Council’s **Privacy Statement** for more information.
# Part A – Your Contact Details

<table>
<thead>
<tr>
<th>Personal Details</th>
<th>Agent Details (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Title:</strong></td>
<td><strong>Title:</strong></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>First Name:</strong></td>
<td><strong>First Name:</strong></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Last Name:</strong></td>
<td><strong>Last Name:</strong></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Organisation</strong></td>
<td><strong>Organisation</strong></td>
</tr>
<tr>
<td>(if the comments</td>
<td>(if the comments you are</td>
</tr>
<tr>
<td>you are making</td>
<td>making are on behalf of an</td>
</tr>
<tr>
<td>are on behalf of</td>
<td>organisation):</td>
</tr>
<tr>
<td>an organisation)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Address:</strong></td>
<td><strong>Address:</strong></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>c/o Agent</strong></td>
<td><strong>Address:</strong></td>
</tr>
<tr>
<td></td>
<td><strong>7 Soho Square</strong></td>
</tr>
<tr>
<td></td>
<td><strong>London</strong></td>
</tr>
<tr>
<td></td>
<td><strong>W1D 3QB</strong></td>
</tr>
<tr>
<td><strong>Postcode:</strong></td>
<td><strong>Postcode:</strong></td>
</tr>
<tr>
<td></td>
<td><strong>n/a</strong></td>
</tr>
<tr>
<td><strong>Telephone</strong></td>
<td><strong>Telephone:</strong></td>
</tr>
<tr>
<td><strong>Number:</strong></td>
<td><strong>Telephone:</strong></td>
</tr>
<tr>
<td><strong>E-mail</strong></td>
<td><strong>E-mail:</strong></td>
</tr>
<tr>
<td><strong>Address:</strong></td>
<td><strong>E-mail:</strong></td>
</tr>
<tr>
<td><strong>Consultation</strong></td>
<td><strong>Consultation/representor</strong></td>
</tr>
<tr>
<td><strong>representor</strong></td>
<td><strong>ID (if known):</strong></td>
</tr>
<tr>
<td><strong>ID (if known):</strong></td>
<td><strong>n/a</strong></td>
</tr>
<tr>
<td><strong>1217</strong></td>
<td></td>
</tr>
</tbody>
</table>
Part B – Your Comments on the Main Modifications

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

Schedule of Proposed Main Modifications

<table>
<thead>
<tr>
<th>Modification Reference Number:</th>
<th>MM 10</th>
</tr>
</thead>
</table>

Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound*?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>✅</td>
<td></td>
</tr>
</tbody>
</table>

Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:

<table>
<thead>
<tr>
<th>Positively Prepared</th>
<th>Justified</th>
<th>Effective</th>
<th>Consistent with National Policy</th>
</tr>
</thead>
</table>

Your Comment:

The additional text clarifying the position in respect of the emerging Thorpe Neighbourhood Plan (TNP) and detailed amendments to the Green Belt boundary pursuant to NPPF (2019) paragraph 137 is welcome. The Local Plan was submitted before 24 January 2019 and, for examination purposes, the 2012 NPPF policies apply (paragraph 214). However, MM10 correctly acknowledges that the TNP will be assessed against the 2019 NPPF and as the Local Plan signals the need to review the boundary of the Green Belt, paragraph 137 provides that detailed amendments to that boundary can be made through non-strategic policies including neighbourhood plans. This will allow the emerging TNP to refine the Green Belt boundary following release of the Village from the Green Belt as it is no longer considered appropriate for it to remain ‘washed over’ (paragraph 140). This will assist the Village in meeting its identified housing and community needs at the neighbourhood level.

*The considerations in relation to being ‘sound’ are explained in Appendix 1 of this Form.

Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

Please complete a continuation sheet for separate comments if you wish to submit a comment on more than one proposed Main Modification.

Please indicate if you have included a continuation sheet?

Yes✅...... No.........
### Continuation Sheet

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

### Schedule of Proposed Main Modifications

<table>
<thead>
<tr>
<th>Modification Reference Number:</th>
<th>MM 14</th>
</tr>
</thead>
</table>

#### Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound?*

- [ ] Yes
- [x] No

#### Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:

- [x] Positively Prepared
- [x] Justified
- Effective
- Consistent with National Policy

Your Comment:

The quantum of homes to be delivered in Thorpe as envisaged through the Local Plan has increased from 60 in the Submission Version to 74 through initial modifications to 89 (including 11 completions and 28 C2) through MM14. It is considered that the Thorpe Neighbourhood Area can accommodate the increased quantum but it is unclear how the current requirement has been arrived at. For example, the extant planning permission (ref. RU.18/0704) at CEMEX House provides for 79 extra care units (Use Class C2). In addition, the emerging Thorpe Neighbourhood Plan (TNP) has been consulted on publicly with submission for examination anticipated shortly. Whilst this figure may change, the consultation draft TNP provided for 97 C3 dwellings which were tested through the TNP SA. Given the extant C2 permission and progress made with the TNP, we suggest that the housing requirement for Thorpe in the Local Plan ought to be increased.

---

Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.
Continuation Sheet

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

Schedule of Proposed Main Modifications

Modification Reference Number: MM 39

Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound*?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:

- Positively Prepared
- Justified
- Effective
- Consistent with National Policy

Your Comment:

The modification to the tenure split, providing for a more balanced target, is welcome. It is noted that the overall target of 35% affordable for major developments remains unchanged. However, that 10% should now be provided as affordable home ownership. There is no objection to this in principle on the basis that the 10% forms part of the overall 35% affordable target. The current wording is not expressly clear on this point and we suggest it would benefit from further clarification. For example, 35% affordable of which 10% shall be affordable home ownership with the remaining 25% split 70:30 between affordable rent and intermediate.

Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.
Continuation Sheet

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

Schedule of Proposed Main Modifications

Modification Reference Number: MM 42

Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound*?

Yes ☑ No

Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:

Positively Prepared Justified Effective Consistent with National Policy

Your Comment:

The increased threshold for self/ custom build plots from developments of 20 to 50 homes is welcome. The acknowledgement that the provision of self/ custom build plots should have regard to the Self Build Register and based on evidence of need/ demand is particularly welcome as this will ensure the optimum delivery of new homes, reducing the risk that land will remain vacant and undeveloped where no demand for self/ custom build exists.

Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.
Soundness

Soundness is explained in the National Planning Policy Framework (2012), paragraph 182. The Inspector has to be satisfied that the Local Plan is positively prepared, justified, effective and consistent with national policy.

Positively prepared
The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified
The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective
The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy
The plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.