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><strong>Personal Details</strong></th>
<th><strong>Agent Details (if applicable)</strong></th>
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<td>Chertsey Parklands LLP</td>
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<td>Nexus Planning, 5th Floor, Thames Tower</td>
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<td>Station Road, Reading</td>
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</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.

<table>
<thead>
<tr>
<th>Schedule of Proposed Main Modifications</th>
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<tbody>
<tr>
<td>Modification Reference Number:</td>
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Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound*?

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

Your Comment: PLEASE SEE ATTACHED DOCUMENT

*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.

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.

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...X No........
## Schedule of Proposed Main Modifications

Modification Reference Number: MM 19

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

Your Comment: PLEASE SEE ATTACHED DOCUMENT

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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.
### Schedule of Proposed Main Modifications

<table>
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<th>Modification Reference Number:</th>
<th>MM 37</th>
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**Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound?**

<table>
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<tr>
<th>Yes</th>
<th>X</th>
<th>No</th>
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</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:** PLEASE SEE ATTACHED DOCUMENT

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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 41 |

**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:**

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

Your Comment: PLEASE SEE ATTACHED DOCUMENT

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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.
Runnymede Borough Local Plan

Schedule of Proposed Main Modifications

Date February 2020

MM12

We support the addition of text at Paragraph 5.40 of the Local Plan, which confirms that delivery of allocations around the A320 could come forward earlier in the plan period - if transport assessments submitted as part of the planning applications demonstrate an acceptable impact.

In that respect, it should be noted that an outline planning application (ref. RU.17/1749) was submitted for up to 200 dwellings at Chertsey Bittams: Parcel D (“Parklands”) in 2017 and is currently awaiting determination. The transport statement submitted in support of that application at makes it clear that the proposed residential scheme for up to 200 dwellings would have a reduced impact of the highway network when compared to the previously consented office scheme at this site. Even so, the applicant has agreed to a proportionate financial contribution for future upgrades to the A320 in the surrounding area but it should be clear that this site is not contingent upon delivery of those upgrades and is capable of delivery at the earliest possible opportunity.

MM19

We note that the timescale for delivery of housing from Site 255: Chertsey Bittams, Parcel D has been revised from 2019-2022 as originally assumed to 2021-2025. Whilst it is regrettable that delivery has been delayed, Chertsey Parklands LLP welcomes acknowledgement that the site will deliver at the earliest opportunity (and before most of the other allocations at Chertsey Bittams) given that an outline planning application for up to 200 dwellings has been under consideration since 2017 and all technical issues at this stage have been resolved.

In common with other sites, the wording suggests that delivery is subject to necessary mitigation on the A320. As set out elsewhere in our response, the transport statement submitted with the current planning application for up to 200 dwellings makes it clear that the residential proposal would result in fewer vehicular movements overall than the previously consented office scheme. Proportionate financial
contributions have been agreed, but it should be clear that the proposal is capable of delivery before mitigation works to the A320 take place.

**MM37**

As set out in our response to MM19, given that an outline planning application for up to 200 dwellings at this site has been awaiting determination since 2017, we support the suggestion that housing will be delivered at the site from 2021 onwards. However, we reiterate concerns regarding a reliance upon mitigation works to the A320. A proportionate financial contribution for later upgrades to the A320 has been agreed, but fundamentally, delivery of the current planning application would have a reduced impact on the highway network when compared to the previously consented office scheme and would therefore not be contingent upon the delivery of mitigation works.

The additional wording at criterion e, clarifying that open space provision for children will be provided on site “wherever possible” (rather than rigidly in accordance with Policy SL26) is also welcomed. In that respect the site in this case is heavily constrained by topography, but is also situated in close proximity to other open spaces nearby including St. Peters Open Space and Homewood Park, the sports facilities at the nearby Salesians School are available to hire whilst the public facilities at Chertsey Recreation Ground are within approximately 1.6km of the Site.

Policy SL26 itself outlines that provision of on-site open space will be negotiated on a site by site basis, where other typologies or may be more appropriate or desirable having regard to relevant parts of the evidence base. The more flexible approach at criterion e is therefore more logical and desirable.

We note that the wording of criterion f) has been revised to make it clear that “proportionate” financial contributions towards the delivery of relevant mitigation on the A320 will be required. Chertsey Parklands LLP welcomes the change as recognition that schemes of different types and scales will have disproportionate impacts on highway capacity. It is therefore only right that the size of the financial contribution sought is proportionate to the impact. In determining what is proportionate however, it should also be acknowledged that the impact from greenfield sites will be greater than previously developed sites with existing vehicular movements associated with them (such as Parklands).

**MM41**

We note and support the exclusion of Chertsey Bittams Parcel D from Footnote 19, making it clear that the allocated site will not be expected to deliver specialist accommodation for older people. It is of a course a fact that a C2 care home on Chertsey Bittams Parcel D has been in existence for a number of years. The allocated site will deliver C3 housing but should not be expected to deliver further specialist accommodation.