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:

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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><strong>Title:</strong></td>
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<td><strong>Last Name:</strong></td>
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<td><strong>Organisation (if the comments you are making are on behalf of an organisation):</strong></td>
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<tr>
<td>Muse Developments Ltd c/o Agent</td>
<td>Carter Jonas</td>
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<td><strong>Address:</strong></td>
<td><strong>Address:</strong></td>
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<td>1 Chapel Place, London</td>
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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 19</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>
</tr>
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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>
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</table>

Your Comment:

Our client welcomes the clarity that is now provided by the insertion of this Main Modification in distinguishing those sites which require mitigation to offset their impact on the A320 corridor.

For the avoidance of doubt, this excludes our client's land Policy SL8 - Thorpe Lea Road West, Egham and confirms its deliverability in the short term.

*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.
**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 28 |

**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:**

A number of proposed modifications are proposed for Policy SL8. The following comments are made in relation to each one:

- Criterion d) - insertion welcomed to allow for the improved accessibility and safety of users of the footpath through the development
- Criterion f) - insertion accepted to promote sustainable transport
- Criterion i) - insertion accepted with regards to provision of children and teenagers play space on site. However, flexibility should be applied with regards to allowance for the developer to provide on-site allotments
- Penultimate paragraph - insertion accepted for provide clarity on the G&T pitches to be provided on land within Muse Developments ownership.
- Final Paragraph - Insertion accepted for consistency with Criterion a) of the policy.

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Schedule of Proposed Main Modifi cations

<table>
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<tr>
<th>Modification Reference Number:</th>
<th>MM 39</th>
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Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound*?

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<th>Yes</th>
<th>x</th>
<th>No</th>
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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:

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Your Comment:

Our client welcomes the proposed amendment to the tenure of affordable housing from a 80:20 split to a 70:30 split in favour of Social Rent.

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**Schedule of Proposed Main Modifications**

<table>
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<th>Modification Reference Number:</th>
<th>MM 40</th>
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**Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound?**

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<th>Yes</th>
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**Your Comment:**

The Council's commitment to meeting the identified needs of Gypsies, Travellers and Travelling Showpeople is supported; however, we have concerns regarding the Council's proposed strategy for their delivery and future management on sites allocated through the emerging local plan.

The proposed additional wording to Policy SL22 (7th paragraph) seeks to provide greater clarity on the detail for an appropriate management arrangement for the pitches. Whilst the obligation to deliver the pitches and associated infrastructure for the pitches is accepted by our client, any assumption of liability for their future maintenance and general site management should fall to the site owner and Council. It is neither feasible nor practical to seek to place liabilities on the developer.

Greater clarity is required within the policy to confirm the Council's approach in finding an external body to manage the sites.

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Thank you for being a part of the consultation.
Appendix 1

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.