To:
Alexandra Milne, DP9 Ltd on behalf of Elysian Residences; Les Durrant, DPDS Consulting Ltd on behalf of SMECH Management Company Ltd; John Baker, Point Consultancy Ltd on behalf of Re-creo Samuels (Addlestone) Ltd

28 May 2020

Dear Ms Milne, Mr Durrant and Mr Baker

Runnymede Local Plan Examination

I refer to your letter dated 7 May addressed to me. In large part it re-iterates the points raised in your 20 February letter which accompanied your responses to the consultation on the proposed Main Modifications (MM) to the Plan.

As you know, I set out information in my note dated 27 March (posted on the examination website on 30 March) that clarified the way in which the examination had progressed towards the MM consultation and also confirmed that the reasons for my conclusions on the soundness of the Plan will be set out in my report to the Council in due course. My note was intended to assist all interested persons in the examination as well as responding to the points that were raised in your letter.

I have carefully considered your 7 May letter and what I can add to my earlier response that may assist you. I remain of the view that the process that I followed during the examination was in accordance with the PINS Procedure Guide, fair and open and addressed the need for efficiency and effectiveness in the conduct of the examination. Therefore, it was not necessary to issue interim findings following the hearing in November 2019 because, by then, my consideration of all the evidence, including on behalf of your clients, indicated to me on balance that the Plan could be made sound by MM which would not require significant further work by the Council such as the identification of additional allocations, deletion of allocations or other substantial alterations.

The process for drafting the MM schedule was as explained in my 27 March note. In accordance with the Act, the Council made its formal request on 16 December 2019 that I should recommend main modifications to the Plan. By this time I was satisfied that the draft schedule of MMs was fit for public consultation, the necessary updating of the examination website appeared to have been completed, and my consideration of the soundness of the Plan was sufficiently advanced to move the examination forward to the MM consultation stage. In this regard I attach (Appendix A) the content of my advice by email to the Council, via the Programme Officer, that illustrates how the process of drafting the MM schedule was progressed between the close of the November hearing and the formal request for MM on 16 December 2019. I trust this may assist you.
Turning to the matter you raise in your 7 May letter about the main modification concerning the review of the Plan, as you know I announced on the website on 17 April that I intended to add this to the recommendations in my report. While it was described as an ‘early’ review on the website, this does not mean that the Plan, as modified in accordance with my recommendations, would be fundamentally unsound without this modification. As you may have noted, the text of the modification as published on the website does not refer to the review as ‘early’. My report will explain why this recommendation is made for the Plan’s on-going effectiveness.

I understand that the outcome of my consideration of the Plan is not what you and your clients had sought, but I trust that my report will make clear why the Plan, as modified in accordance with my recommendations, will be sound.

In conclusion, please note that despatch of my final report to the Council is imminent, at which point the examination will be closed. The Council will publish the report in due course. Any further enquiries should be addressed to the Council.

Yours sincerely

Mary Travers
Inspector

Attachments: Appendix A
APPENDIX A

From: Travers, Mary  
Sent: 26 November 2019 12:19  
To: Charlotte Glancy <bankssolutionsuk@gmail.com>  
Subject: Very urgent re Draft schedule of proposed main modifications  
Importance: High  

Charlotte

I set out below my comments/corrections/queries on the Council’s draft Schedule of Proposed Main Modifications. Please ask the Council to address each of them and let me have an updated version of the schedule, set out in track changes, as soon as possible. And please confirm with the Council that I will be happy to deal with any queries about these in order to progress this work. Obviously, care is needed to get the schedule right so that it accurately reflects the updated evidence that has been put forward in the past few months.

In due course I will make a formal statement (as indicated at the Stage 3 hearing) on the website, to confirm that I am inviting the Council to draft a schedule of MMs for public consultation, but I will not make this announcement until the various loose ends that I have raised over recent weeks are addressed. I do hope that significant progress will be made on these in the next day or so.

Please also ask for confirmation as early as possible about the deadline for the Council and I to finalise the draft schedule document in order for it to go to the 7 January Special Planning Committee. You will recall that I asked if there are any availability issues for the Council that I ought to be aware of. I will make every effort to arrange my own availability to complete the work.

Looking forward to hearing from you.

Regards

Mary

............

MM3: 7507 for the Plan period equates to 500 homes per year. All references in the schedule to 498 homes per year should be replaced by 500 homes per year.

MM8: Please check the 7939 figure wherever it occurs in the schedule. The trajectory in RBCLP_52 shows total site capacity as 7889, and completions and expected delivery as7920. Clearly the details in Policy SD2 and all other policies and parts of the Plan, including the Monitoring Framework, will need to be consistent with the trajectories that are to be included in the Plan (and are currently set out in Appendix 6 of the Schedule of MMs).

New MM to paragraph 5.40: the wording should reflect the MM proposed by Crest Nicholson and discussed at the Stage 3 hearing.

MM11: For consistency with Policy IE1, the references to the employment floorspace in Policy SD2 should be modified to say “…in the region of 20,000 sq m” (as Policy SD2 is currently expressed, it requires a minimum of 20,000 sq m). The references occur in the second sentence and in the line for Woodham and New Haw.
MM12: the justification refers to the `new methodology’ for calculating the contribution that C2 older accommodation (note: this should say older people’s accommodation) can make to the housing trajectory. The justification needs re-wording to clarify very briefly what `the new methodology’ refers to. I assume that it is the methodology as set out on p18 of the schedule.

MM12: Policy SD2: In the line referring to `Other’ and showing 23 net additional dwellings, please remind me what `Other’ is comprised of in this policy. A footnote in the Plan to explain this would be helpful.

MM15: re the reference to 3536 net additional dwellings, should this be 3517 for consistency with the trajectory in RBCLP_52? Are any other main modifications required to paragraph 5.38 or Table 2 of Policy SD2 for updating/consistency of the numbers throughout the Plan?

MM17: Policy SD3 table, phasing column: please check and confirm that the content is consistent with the Council’s evidence for Stage 3 and with the rest of the Plan.

New MM to paragraph 5.52: include an update that work on the Local Transport Strategy has begun.

New MM (paragraph 5.104a) as per Crest Nicholson’s suggested MM that was discussed at the Stage 3 hearing.

Query re Policy SD10 criterion e), bullet point 3: I would welcome an explanation about the reference to `a major service centre outside the Borough’. Why is this expressed in non-specific terms? Is the intention sufficiently clear?

Query re Policy SD10, criterion e), bullet point 4: Why is it necessary to delete the reference to `including the Longcross Barracks site’? The justification does not explain this.

MM20 Policy SL2, criterion c) and identical wording as it appears in many places in the schedule: reference to `...accessibility safety and/or...’. I assume this should be corrected to say `...accessibility, safety and/or...’.

MM27 Policy SL10 criterion e): Why does this refer only to off-road cycle routes at LGV? Also, should it say `.contribute to links to...’, rather than `.contribute to...’?

MM30 proposes to delete the reference to the whole of the hospital complex site being released from the GB. Please explain the background to this. As I understand it from the submission Plan Policies Map, the remainder of the hospital complex is not in the GB.

MM31 re SL15: the timing of delivery (2023-2025) is not consistent with MM17 which sets it out as 2023-2026.

MM36, Policy SL20 1st paragraph: the 2nd part of the sentence needs a verb.

MM36 Policy SL20, 2nd paragraph and Paragraph 6.40: The references to NPPF 2018 should be changed to NPPF 2019. Please check and correct any other such cases – I’ve also noted one in the justification column for Policy EE1.

MM37 Policy SL22: Firstly, the policy needs to include an updated table to replace that in the submitted Plan. I assume that this will broadly reflect the position laid out in RBCLP_22 but please confirm/explain if there are any changes to that position. The timescale for the delivery of the pitches/plots will require amendment as necessary for consistency with the revised trajectory for the housing allocations. Secondly, this
section of the Plan should include a reference to how the needs of Gypsy and Traveller households who do not meet the planning definition will be accommodated in the Borough (this formed part of the Council’s evidence that was discussed in the hearing). Thirdly, the Plan should explain the position on transit site provision in the Borough (the GTAA does not identify a need) and set out the wider context for consideration of transit provision (as described in RBCLP_22). Fourthly, in the 7th paragraph of the Policy (see page 52 of the draft schedule of MMs), the proposed new text commencing ‘Further to Policy SL20…’ needs editing for clarity. I think it should read ‘Further to Policy SL20, consideration of delivery of a proportion of the pitches or plots at below market value, as affordable housing, based on evidence of need as set out in the Council’s latest GTAA and viability at the time of the application.’

MM38, paragraph 6.56: Given that the care facility at Chertsey Bittams Parcel D is an existing one, the reference to the allocation site in footnote 19 should be deleted.

MM38, Policy SL23, 1st paragraph: grammatical error in final sentence, it should be `is’ as in `It will be expected that proposed development is…’.

MM39, paragraph 6.66, first sentence. Is it clear in this context what is meant by `strategic’ development sites?

MM44, paragraph 7.82: this requires a re-draft as a result of the removal of the cap on pooling of s106 contributions.

MM44, Policy EE10, 3rd bullet point: The justification column needs correction to refer to the Thames Basin Heaths Delivery Framework.

MM48: typos in first sentence. It should read `The re-use of buildings in the Green Belt is not inappropriate....’.

MM55: Table 3 should be clarified to make clear that the numbers refer to floorspace growth e.g. sq m gross (if they are in fact sq m gross figures).

MM57, re new policy IE11 for Strodes College Lane: In the column that sets out the timing and development requirements, for clarity amend criterion b) to say: ‘development for Class A use* at ground floor level’.

MM57, re the section on Opportunity Areas, in the section referring to Chertsey Opportunity Area: Sainsburys and car park, make a correction to the final 2 sentences for overall comprehension.

MM59, Monitoring Framework: Under Objective 5, target 5: the number of plots for Travelling Showpeople should be specified.