Dear Ms Travers,

RUNNYMEDE LOCAL PLAN 2030 – UPDATE FROM THE INSPECTOR 17 APRIL 2020

I write following the recent update published on the Council’s examination web page having been instructed to submit representations on behalf of my client; Tarmac Trading Limited. My client is the freehold owner of an area of land (~11Ha) located to the north of Thorpe Industrial Estate, Thorpe Lea. Referred to hereon as “the site”, it has been actively promoted throughout the Examination as an ‘omission site’ for Industrial development. Relevant references used by the Council to identify the site include:

- “Site 18 – Land North of Thorpe Industrial Estate” (SLAA, Sustainability Appraisal, Site Selection Methodology and Assessment); and,
- “Sub Area 87” (Green Belt Review).

Without prejudice to my client’s position in relation to the proposed main modifications and our further requested modifications, we have major concerns relating to the content of the recent update. In particular this relates to the invitation to the Council that reflects “the Council’s commitment to early review of the Plan as expressed during the examination”.

The update then continues and describes the scope of said ‘early review’ as follows:

“a review of the Runnymede 2030 Local Plan as soon as possible to ensure that it is able to meet the requirement of the NPPF to complete a review of the plan within 5 years of the date of the adoption of this plan. In practical terms, this will mean that the Borough Council commences its review early in 2021, in order to complete a review before the summer of 2025.”

In reality this is not an ‘early review’ in any shape or form, it is simply a ‘review’ that is required in any event by the NPPF, the Planning Practice Guidance and Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). To describe this as an early review is misleading and unhelpful and does nothing to resolve my client’s fundamental objections relating to the soundness of the plan under examination.

My Ref: TAR-054-C/EiP/MM
Your Ref:
Date: 7 May 2020
This is compounded further by a lack of clarification as to what scope the review will take, other than confirming that a revised Local Development Scheme (LDS) will emerge at some point in 2020 to provide a timetable and that a new plan will encompass the proper 15 year plan period that this plan has failed to provide for. It is inevitable that the ‘new plan’ will also require a further review of the Green Belt leaving the revised boundaries to have endured for less than 5 years rather than ‘beyond the plan period’. I am also unaware that any detailed discussion took place during the examination on the precise scope of a review let alone an ‘early review’.

On this basis, there can be no certainty for the development industry that this main modification can deliver a meaningful outcome of meeting present or future development needs in a coordinated, sustainable and flexible way.

It therefore remains very much the case that this plan fails to provide for sufficient employment land which should be urgently rectified.

The need for positive decisive action is further amplified by the current public health crisis. Whilst the full extent of economic impacts are likely to be understood over the coming months and years, the Government’s support for economic development remains clear and is only likely to increase. As such, opportunities to support sustainable economic development and deliver added stimulus to markets which are likely to see continued demand should not be passed up.

In regard to the industrial property market, my clients consider that there are clear market signals (over and above those put forward in evidence) that demand will continue from industrial sectors, including the need for storage and distribution where there is continued interest in their site.

Recent consumer surveys have shown that some of the necessary rise in online retailing is likely to become permanent. Results of a RetailX attitudes survey revealed that 24% of respondents said that after the Covid-19 health issue is over, they will carry on shopping as they are now. Many retailers may need to ramp up their online operations faster than previously planned.

Also many manufacturing firms are also facing supply-side challenges with widespread disruptions to global supply chains. The Covid-19 outbreak is likely to lead businesses to assess ways to mitigate against future supply chain disruptions. Resilience measures are likely to include a move towards reshoring operations and more domestically orientated supply chains. These are issues that should be taken into consideration in respect of this plan as we move towards a crucial stage in its preparation.

My client’s concerns remain related to a single, well defined issue that could be positively rectified through the allocation of their land, a safeguarding policy or a focused review over a more urgent timescale than the standard five years which is to put it bluntly, passing the buck.

I trust that these comments are sufficiently clear and provide assistance at this important juncture. We look forward to some further clarity on how this process will progress. In the meantime should you have any queries or require any further information or clarification please do not hesitate to contact me

Yours sincerely,

Chris Lindley BA (Hons) MSc MRTPI
Heaton Planning Ltd