

THORPE  
NEIGHBOURHOOD PLAN

2015 - 2030

BASIC CONDITIONS STATEMENT

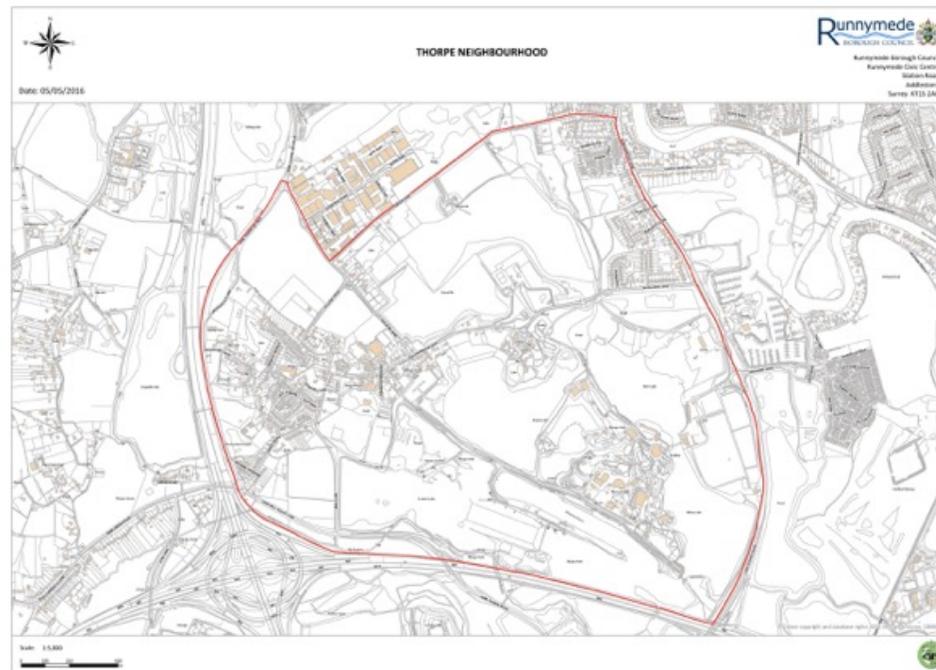
Published by Thorpe Neighbourhood Forum under the Neighbourhood Planning (General) Regulations 2012 (as amended)

JUNE 2020

# 1.INTRODUCTION

1.1 This statement has been prepared by the Thorpe Neighbourhood Forum (“the Forum”) to accompany its submission of the Thorpe Neighbourhood Plan (“the Neighbourhood Plan”) to the local planning authority Runnymede Borough Council (“the Borough Council”), under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) (“the Regulations”).

1.2 The Neighbourhood Plan has been prepared by the Forum, the ‘qualifying body’, for the Neighbourhood Area (“the Area”), which was designated by the Borough Council on 24 August 2016 (see Plan A below). The Forum has consulted the local community, land interests, the statutory bodies and other stakeholders throughout the preparation of the Neighbourhood Plan, as required by the Regulations. This is detailed in the Consultation Statement, which is published separately as part of the submission documentation.



Plan A: Designated Neighbourhood Area

1.3 The policies described in the Neighbourhood Plan relate to the development and use of land in the designated Area only. They do not relate to 'excluded development', as defined by the Regulations. The plan period is from 1 April 2015 – 31 March 2030 which corresponds with the end of the plan period of the emerging Runnymede 2030 Local Plan.

1.4 The statement addresses each of the 'Basic Conditions' required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Town & Country Planning Act.

1.5 The Regulations state that a Neighbourhood Plan will be considered to have met the conditions if:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Development Plan,
- b) Not relevant for this Neighbourhood Plan,
- c) Not relevant for this Neighbourhood Plan,
- d) The making of the Neighbourhood Development Plan contributes to the achievement of sustainable development,
- e) The making of the Neighbourhood Development Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- f) The making of the Neighbourhood Development Plan does not breach, and is otherwise compatible with EU obligations

1.6 The responsibility for determining if a Neighbourhood Plan meets the basic conditions rests with a combination of the qualifying body, the local planning authority and the independent examiner (Planning Practice Guidance §41-070 and §410-074). Case law, established in the Tattenhall Neighbourhood Plan in 2014 (see §82 of EWHC 1470) but endorsed by the Courts on a number of occasions since, makes clear that:

"... the only statutory requirement imposed by Condition (e) is that the Neighbourhood Plan as a whole should be in general conformity with the adopted Development Plan as a whole ... any tension between one policy in the Neighbourhood Plan and one element of the ... Local Plan (is) not a matter for the Examiner to determine." (our emphasis)

1.7 The case acknowledged that there will often be tensions between different strategic policies when considered against the non-strategic policies of a specific local area covered by a Neighbourhood Plan. It sensibly concluded that such tensions can only be resolved by the qualifying body using its planning judgement to strike an appropriate balance across the plan as a whole. The examination tests the extent to which the qualifying body has exercised its judgement in a reasonable way. The fact that the local planning authority, in its representations on the plan, indicates that it would strike the balance differently, is not a relevant consideration.

1.8 It is noted that the case law has not yet explicitly established the same principle for Condition (a) in respect of the regard to national policy, but it seems reasonable to expect the Courts would reach the same conclusion, given there will also be a range national policies influencing plan making, and that those policies may also be in tension. It is therefore expected that the examination of this Condition will take the same approach as Condition (e).

1.9 For these reasons, sections 3 and 5 of this Basic Conditions Statement highlight which policies of the Neighbourhood Plan are considered to meet Conditions (a) and/or (e) and, if any, those that do not. Where they do not, the Statement explains how the qualifying body has reached a view in those cases “where different parts of national policy need to be balanced” (S070) and how it has taken into account the criteria of S074 on general conformity. Finally, it explains how the Neighbourhood Plan as a whole meets Conditions (a) and (e).

#### Local Plan / Neighbourhood Plan dependency

1.10 The RLP is at an advanced stage and timetabled for adoption in July 2020. the Neighbourhood Plan has taken advantage of the provisions of NPPF paragraph 136. Cognisant of the interrelationship this creates with the emerging Runnymede 2030 Local Plan (RLP), the Thorpe Neighbourhood Forum (the ‘Forum’) has pursued an effective relationship with the Borough Council.

1.11 The approach taken by the Neighbourhood Plan in making a detailed amendment to the Green Belt boundary in line with the provisions of NPPF paragraph 136, is singularly dependant on the successful adoption of the new Runnymede 2030 Local Plan before the policies of the Thorpe Submission Plan can be examined. This reflects Planning Practice Guidance (41-004-20190509):

*“A neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in paragraph 13 of the National Planning Policy Framework). Within this broad context, the specific planning topics that a neighbourhood plan covers are for the local community to determine.”*

1.12 This interrelationship is crucial, both in terms of how Planning Practice Guidance (PPG) addresses matters where a neighbourhood plan and a local plan are emerging at the same time and to a common sense approach that would avoid the emerging neighbourhood plan either to be delayed or to be reviewed/updated soon after the eventual adoption of the emerging Local Plan. The Neighbourhood Plan has therefore aligned itself in both timing and context to the approach taken to the release of land from the Green Belt (Insetting) for Thorpe in the emerging Runnymede 2030 Local Plan, particularly policy SD1, while applying the principles in paragraph 137 and criteria in paragraph 139 to determine whether ‘exceptional circumstances’ exist to justify a further detailed amendment to the Green Belt in Thorpe have examined other reasonable options for meeting the needs of village.

1.13 In this respect the approach set out in PPG 41-074-20140306 has been applied. This requires that the 'basic condition' relating to 'general conformity' with strategic policies contained in the Local Plan to consider the following:

- a) whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with;
- b) The degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy;
- c) whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy;
- d) the rationale for the approach taken in the draft neighbourhood plan and the evidence to justify that approach.

1.14 Table B addresses the factors outlined in PPG 41-074 in the context of the Runnymede 2030 Local Plan as a whole. In relation to policy SD1 specifically, the Neighbourhood Plan responds to PPG 41-074 as follows:

- a) Policy TH1 and TH2(iii) upholds the general principle of SD1 which allocates a minimum of 89 dwellings to Thorpe and paragraph 5.30 (as modified) which supports the principle of the Neighbourhood Plan making a 'detailed amendment' to the Green Belt boundary.
- b) There is no conflict between policies TH1 and TH2(iii) as they uphold the principle and scale of Green Belt release in line with the RBC's representation to the Local Plan Examination<sup>1</sup> to facilitate limited growth.
- c) Policy TH1 and TH2(iii) provide a distinct local approach to Policy SD1 by supporting limited growth while also addressing the infrastructure needs of Thorpe
- d) The rationale for the approach taken is set out in various supporting documents, including the Sustainability Appraisal, the Landscape, Visual Appraisal and Green Belt Review, and the NP Green Belt 'Exceptional Circumstances' Note.

---

<sup>1</sup> [Runnymede Borough Council response to Matter 6.5](#) of the Inspector's Matters and Questions for the Stage 2 hearings (paragrapgh 6.67)

## The Thorpe Housing Requirement

1.15 Policy SD1<sup>2</sup> (Main Modification 7) establishes the Spatial Development Strategy for the designated neighbourhood area in the period to 2030 which includes a minimum housing requirement for Thorpe of 89 dwellings. Paragraph 5.30 of Policy SD1 proposes to inset Thorpe village from the Green Belt, and in so doing define a village boundary and release land for development on the edge of the village which currently lies within the Green Belt.

1.16 The Council has confirmed that the 89 dwellings<sup>3</sup> is the housing requirement for the designated neighbourhood area in line with NPPF paragraph 65. Since the publication of the Submission Local Plan, the Council has updated the housing trajectory for Thorpe to reflect the position at April 2020 following the approval of the CEMEX House scheme (see Table A overleaf) and 11 completions.

1.17 The Council has converted the C2 component of the trajectory resulting from CEMEX House. The approval for 79 C2 dwellings at Cemex House has been divided by 1.8 to provide a C3 equivalent number of 44 in line with Planning Practice Guidance for the purposes of the Housing Delivery Test<sup>4</sup>.

1.18 However, to ensure this component of C2 does not distort the housing need in Thorpe for C3 dwellings a further correction of 16 dwellings has been included in the trajectory and when added to the minimum requirement of 89 dwellings results in a minimum C3 housing requirement of 105 dwellings.

---

<sup>2</sup> Note: All references to SD1 relate to Policy SD2 in the Submission Local Plan as now modified.

<sup>3</sup> RLP Schedule of Proposed Main Modifications – Main Modification 14 Policy SD1 Table 1

<sup>4</sup> Planning Practice Guidance: Paragraph: 016a Reference ID: 63-016a-20190626)

<b>Site</b>	<b>Net Additional Dwellings</b>
<b>SD1 C3 Minimum Housing Requirement (NPPF paragraph 65)</b>	<b>89</b>
<b>Completions 2015-2019</b>	
Land at the Former Mushroom Farm and the Willow, Rosemary Lane (ID308)	5
242 Chertsey Lane (RU.15/1593)	1
Acorn Farm, Village Road (RU.15/1856)	1
Thelma, Rosemary Lane (RU.16/0395)	4
<b>Pipeline / Commitments</b>	
Beacon Church Hall, Rosemary Lane (RU.16/0100)	1
The Old Workshop, West End Farm (RU.19/1530)	1
Poussins, Village Road (RU.15/1858)	1
Cemex House (RU.18/0703 – (ID123)	44 (as C3 equivalent)
<b>Total less Completions/Commitments</b>	<b>31</b>
To correct supply of C2 older people's units at Cemex House in lieu of C3 = 44 – 28 (as C3 equivalent)	16
<b><u>Residual C3 minimum housing requirement</u></b>	<b><u>47</u></b>

Table A – Thorpe Housing Trajectory 2015 - 2030

## 2.BACKGROUND

2.1 The decision to proceed with a Neighbourhood Plan was made by the Forum in 2016. The key driver of this decision was a sense of wanting to plan positively for the future of the Area, in anticipation of the adoption of the new Runnymede Local Plan 2030. The Forum considered that having a plan would improve the way in which future development proposals are managed.

2.2 A steering group was formed comprising members of the Forum. The group has been delegated authority by the Forum to make day-to-day decisions on the preparation of the Neighbourhood Plan. However, as the qualifying body, the Forum approved the publication of the Pre-Submission Plan in November 2019 and the Submission Plan now.

2.3 The Forum has consulted the local community extensively over the duration of the project. It has also worked closely with officers of the Borough Council since the start of the project to collate and examine the evidence base, to design and iterate policy proposals and to define the proper links between the Neighbourhood Plan, the adopted and emerging development plan. The outcome of that work is the Submission version of the Thorpe Neighbourhood Plan.

2.4 The Neighbourhood Plan contains eleven land use policies, which are defined on the Policies Map where they apply to a specific part of the Area. The Neighbourhood Plan has deliberately avoided containing policies that unnecessarily duplicate saved or forthcoming development plan policies or national policies that are already or will be used to determine planning applications. The policies are therefore a combination of site-specific allocations or other proposals, and development management matters that seek to refine and/or update existing policies.

### 3.CONDITION (A): HAVING REGARD TO NATIONAL PLANNING POLICY

3.1 The Neighbourhood Plan has been prepared with full regard to national policies as set out in the National Planning Policy Framework (NPPF) and is mindful of the Planning Practice Guidance (PPG) in respect of formulating Neighbourhood Plans. In overall terms, there are four NPPF paragraphs (§13, §28 - §30) that provide general guidance on neighbourhood planning, to which the Neighbourhood Plan has directly responded.

3.2 The Forum considers the Neighbourhood Plan “support(s) the delivery of strategic policies contained in local plans...and shape(s) and direct(s) development that is outside of these strategic policies” (§13). It considers the Neighbourhood Plan contains only non-strategic policy proposals or proposals that refine strategic policy to fit the circumstances of the Area without undermining the purpose and intent of those strategic policies (§18). It also considers that the Neighbourhood Plan set(s) out more detailed policies for the specific area (including) ... the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies” (§28).

3.3 The Forum considers that its Neighbourhood Plan has provided its communities the power to develop a shared vision for the Area that will shape, direct and help to deliver sustainable development, albeit in a modest way, by influencing local planning decisions as part of the statutory development plan. The Neighbourhood Plan contains three site allocation policies that will result in more development than set out in the strategic policies for the area (as proposed in the emerging Local Plan) (§29). In this regard, the NPPF provisions of meeting local housing needs as per §65 is therefore relevant to this Neighbourhood Plan. The Plan is underpinned by relevant and up-to-date evidence. This is considered to be adequate and proportionate, focused tightly on supporting and justifying the policies concerned (§31).

3.4 The land interests were invited to submit relevant information for the Forum to gauge the capacity and suitability of each site. No response was received from Thorpe Park Farm and consequently the site was omitted from further consideration. In each of the allocated sites, there has been no need to significantly modify the submitted information. In which case, the Forum expects each policy will be welcomed and supported by each land interest, thus demonstrating that the policy provisions are viable in principle at this plan-making stage (§57).

3.5 Each policy engages one or more specific paragraphs of the NPPF. Those that are considered to be of the most relevance and substance are identified in Table A below. The commentary column indicates where a balancing exercise has been necessary.

Table A: Neighbourhood Plan & NPPF Conformity Summary

No.	Policy Title	Commentary
TH1	Thorpe Village Boundary	<p>The 'need for changes to Green Belt boundaries has been established through strategic policy', Policy SD1 of the development plan<sup>5</sup>. Where this is the case 'detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.' (§136).</p> <p>Policy TH1 therefore makes a 'detailed amendment' resulting in the revised village boundary. 'When defining Green Belt boundaries, plans should: ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development' (§139a). The development plan currently consists of saved policies of the adopted Local Plan 2001 which predates the NPPF. However, 'up to date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan ... contributes to the achievement of sustainable development'<sup>6</sup> and given that the Neighbourhood Plan is expected to be examined after the adoption of the new Local Plan, the 'development plan's strategy for meeting identified requirements for sustainable development' is considered to be established by Policy SD1 of the Runnymede 2030 Local Plan. Table B in this Basic Conditions Statement demonstrates that the 'detailed amendment' to the Green Belt boundary is in line with Policy SD1.</p> <p>Plans should also 'not include land which it is unnecessary to keep permanently open' (§139b). The Landscape and Visual Assessment and Green Belt Appraisal Report (in the evidence base) has reviewed the findings of the RBC Green Belt Review and concludes that the sub-parcel of land considered in the proposed allocation of policy TH2 (iii) does not make a significant contribution to the purposes and functions of the Green Belt. The Forum's 'Exceptional Circumstances' Note (also in the evidence base) and the supporting text to Policy TH2(iii) sets out the exceptional circumstances to justify release of this land from the Green Belt as an enabling residential scheme.</p>

<sup>5</sup> IBID footnote 1 and Local Plan Main Modification MM10

<sup>6</sup> Paragraph: 009 Reference ID: 41-009-20190509

		<p>The plan does not propose to 'identify areas of safeguarded land' as it is not considered 'necessary' (§139c&amp;d). Plans should also 'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period' (§137g). The existing provisions are consistent with the Borough Council's strategy and meet the 'housing requirement figure' (§65) for the designated neighbourhood.</p> <p>Lastly, plans should 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.' (§137f). Although there are currently few 'physical features' the Landscape and Visual Assessment, Green Belt Appraisal and other supporting technical evidence concludes that the proposed development can be successfully accommodated to the south western corner of the available land, if set within an enhanced framework of mature trees and vegetation. The criteria set out in the allocation policy would ensure that the boundary is 'readily recognisable' and the development would 'round off' the settlement edge<sup>7</sup>. The parkland proposal that forms part of the allocation policy includes a proposal for the transfer of land to a trust. Its operation as parkland is therefore 'likely to be permanent'.</p> <p>Furthermore, Policy SD1 provides a 'clear starting point' (§21) for the operation of non-strategic policies in the Neighbourhood Plan. The policy updates the Village Green Belt Inset boundary to accommodate the proposed allocation of policy TH2 (iii) and to retain clarity as to how and where policies should apply (§16d).</p>
TH2	<p>Site Allocation Policies</p> <ul style="list-style-type: none"> <li>• TH2(i) – Land off Rosemary Lane</li> <li>• Policy TH(ii) – Land off Green Road, Woodcock Hall Farm</li> <li>• Policy TH(iii) – Land East of Ten Acre Lane/North of Coldharbour Lane</li> </ul>	<p>Policy SD1 confirms that the 'housing requirement figure' (§65) for the designated neighbourhood area is a minimum of 89 over the plan period, 46 of these have already been delivered, or are commitments considered to count towards this figure.</p> <ul style="list-style-type: none"> <li>• TH2 (i) – Land off Rosemary Lane</li> </ul> <p>The policy allocates 1.75 ha of land for a mix of residential and green infrastructure uses with the developable land for residential use being limited to 1 Ha in the village boundary of Policy TH1 to deliver approximately 24 new homes, contributing to its 'housing requirement figure' (§65). In making this allocation 'the need to promote sustainable patterns of development (has been) taken into account' (§138) and this</p>

<sup>7</sup> Runnymede 2030 Site Selection Methodology and Assessment Final, Dec 2017 (paragraph 4.60)

		<p>site within the village boundary of Thorpe (inset from the Green Belt) has been taken forward in the first instance. The proposal acknowledges the requirement to make the efficient use of land (§122) but that any higher density would undermine the area’s prevailing character (§122d), and built form on the ‘amenity green space’ to the west of the site would impinge on the setting of Grade II listed West End Farmhouse to the north.</p> <p>Furthermore, the ‘size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies’ (§61). The Housing Needs Assessment indicates that there is a need for 2 and 3 bedroom homes. The policy requires that a special emphasis is given to delivering homes that are suitable for first time buyers or those looking to rent their first homes. The policy gives effect to the direction of §61 in seeking to meet the housing need of different groups, in this case younger people. In practise, the allocation is broadly in line with the Government’s intent in introducing the new ‘Entry-Level’ homes product (§71) which is not permitted on Green Belt land.</p> <p>‘Planning policies ... should support development that makes efficient use of land’ and it should do so by taking into account ‘the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use...the importance of securing well-designed, attractive and healthy places.’ (§122). Similarly, ‘planning policies ... should ensure that developments ... will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)...create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.’ (§127).</p> <p>The site is adjacent to an existing Air Quality Management Area declared in relation to nitrogen dioxide levels associated with the M25 and within the setting of Grade II listed West End Farm. Therefore, ‘planning policies...should... prevent(ing) new and existing development from contributing to being put at unacceptable risk from, or being</p>
--	--	---

		<p>adversely affected by, unacceptable levels of ...air, ... or noise pollution ... Development should, wherever possible, help to improve local environmental conditions such as air...quality... remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate(\$170e&amp;f). Policies should also consider that heritage assets are 'an irreplaceable resource and should be conserved in a manner appropriate to their significance...' (\$184). Additionally, the site lies in close proximity to a Biodiversity Opportunity Area and it has also been identified as a potential location for bats. The policy should therefore 'safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity...' (\$174a). The policy includes a number of mitigating measures in accordance with these NPPF policies.</p> <p>Although limiting the developable area is necessary to maintain and reinforce the landscape and visual buffer separating the village from the M25 and Thorpe bypass, to sustain heritage assets, and to safeguard biodiversity, given the importance that government attaches to meeting 'housing requirements', by demonstrating that the site can deliver a suitable scheme it is considered that, on balance, the Neighbourhood Plan policy has regard to the policies in the NPPF.</p> <p>'Transport issues should be considered from the earliest stages of plan-making so that ... the potential impacts of development on transport networks can be addressed' (\$102). 'Planning policies should ... provide for high quality walking and cycling networks' (\$104). The policy therefore also includes measures that will deliver these outcomes to be agreed with highways authority.</p> <p>The mix of uses required by the policy 'ensure that development(s) will function well and add to the quality of the area' (\$127a), includes 'appropriate and effective landscaping' (\$127b) and 'optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space)' (\$127e) as well as promoting 'health and well-being' (\$127e) within a design that is 'sympathetic to the surrounding built environment and landscape setting' (\$127c).</p> <p>In summary, it is considered that the allocation, with its specific mitigation measures set out as requirements, has had proper regard to national policy.</p>
--	--	---

		<ul style="list-style-type: none"> <li>• Policy TH2(ii) – Land off Green Road, Woodcock Hall Farm</li> </ul> <p>The policy allocates 0.6 ha of land for residential uses in the village boundary of Policy TH1 to deliver between 5 and 10 new homes, contributing to its 'housing requirement figure' (§65). In making this allocation 'the need to promote sustainable patterns of development (has been) taken into account' (§138) and sites within the village boundary of Thorpe inset from the Green Belt has been taken forward in the first instance.</p> <p>Furthermore, the 'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies' (§61). The Housing Needs Assessment indicates that there is a need for 2 and 3 bedroom homes. The policy requires that a special emphasis is given to delivering homes that are suitable for 'downsizers'. The policy gives effect to the direction of §61 in seeking to meet the housing need of different groups, in this case older people wishing to downsize. The site lies within a central location in the village and has the best access to local facilities. There are non-designated heritage assets nearby. Therefore, the policy should 'ensure an integrated approach to considering the location of housing...and community facilities and services' (§92e) and consider that heritage assets are 'an irreplaceable resource and should be conserved in a manner appropriate to their significance...' (§184). The site no longer lies within a flood risk zone, but it is adjacent to a designated Site of Nature Conservation Interest and in close proximity to the South West London Water Bodies Special Protection Area. The policy should therefore 'safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity...' (§174a). 'Transport issues should be considered from the earliest stages of plan-making so that ... the potential impacts of development on transport networks can be addressed' (§102). 'Planning policies should ... provide for high quality walking and cycling networks' (§104). The policy therefore also includes measures that will deliver these outcomes to be agreed with highways authority.</p> <p>The policy includes a number of mitigating measures in accordance with the NPPF policies outlined above and it is therefore considered that the allocation, with its requirements, has had proper regard to national policy.</p>
--	--	---

		<ul style="list-style-type: none"> <li>• Policy TH2(iii) – Land East of Ten Acre Lane/North of Coldharbour Lane</li> </ul> <p>Despite the completions, commitments and allocations in Policies TH2 (i) and (ii), there remains a shortfall in meeting the ‘housing requirement figure’.</p> <p>Given that the ‘need for changes to Green Belt boundaries has been established through strategic policies’ (§136), and there are no other sites available within the village boundary, the plan should give ‘...first consideration to land which has been previously-developed and/or is well-served by public transport...’ and ‘...set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land’ (§138). The Green Belt boundary must also be defined ‘...clearly using physical features that are readily recognisable and likely to be permanent.’ (§139).</p> <p>Thorpe village is heavily constrained by European Designations, flood risk, Green Belt and transport infrastructure. There is a limited supply of available land and previously developed sites within the proposed Green Belt Inset boundary as evidenced by the Site Assessment Report. Moreover, the SA/SEA has grappled with these multiple constraints on sustainable development and assesses the preferred option which includes limited Green Belt release as an appropriate strategy.</p> <p>The policy therefore allocates 13.57 ha of land for a mix of residential, sport/recreation, green/blue infrastructure, and cemetery uses with the developable land for an enabling residential use being limited to 1.76 Ha in the village boundary of Policy TH1 to deliver approximately 40 new homes, therefore meeting its ‘housing requirement figure’ (§65). The site is well located in respect of the village core and the ‘impact of removing land (1.76 Ha for residential use) from the Green Belt...(will be) offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.’ (§138) in the form of the parkland proposal. A landscaped belt on the eastern and northern edges of the residential parcel proposed to be released from the Green Belt will ‘define boundaries clearly, using physical features that are recognisable and likely to be permanent’ (§139).</p>
--	--	---

		<p>The non-residential mix of uses / parkland proposal is considered to provide the 'exceptional circumstances' to justify release of land from the Green Belt for the residential scheme (§143) to meet the housing requirement for the area. Local 'social, recreational and cultural facilities and services the community needs' (§92) are specific to the location of this allocation. The parkland proposal makes provisions to 'ensure an integrated approach to considering the location of housing, economic uses and community facilities and services' (§92e) and the residential element enables this infrastructure to be delivered to meet local needs. These mix of uses will be located on land within the Green Belt and the policy therefore engages the provisions of §145b requiring the 'provision of appropriate facilities (in connection with...a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds...; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it'.</p> <p>Furthermore, the 'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies' (§61). The Housing Needs Assessment indicates that there is a need for 2 and 3 bed homes. The policy requires that a special emphasis is given to delivering such homes.</p> <p>The site lies within the Thorpe Conservation Area where the majority of the area's listed buildings are located. Policies should therefore also consider that heritage assets are 'an irreplaceable resource and should be conserved in a manner appropriate to their significance...' (§184). Additionally, the site lies in close proximity to the South West London Water Bodies Special Protection Area. The policy should therefore 'safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity...' (§174a). The policy includes a number of mitigating measures in accordance with these NPPF policies.</p> <p>'Transport issues should be considered from the earliest stages of plan-making so that ... the potential impacts of development on transport networks can be addressed' (§102). 'Planning policies should ... provide for high quality walking and cycling networks' (§104). The policy therefore also includes measures that will deliver these outcomes to be agreed with the Highway Authority.</p>
--	--	---

		In summary, it is considered that the policy in its approach to amending the Green Belt boundaries, and in demonstrating the exceptional circumstances for making this amendment, along with its specific mitigation measures set out as requirements, has had proper regard to national policy.
TH3	TASIS School	The policy enables 'the sustainable growth and expansion of' TASIS School, a major employer in the area, 'both through conversion of existing buildings and well-designed new buildings' (§83a), where proposals will 'sustain(ing) and enhance(ing) the significance of heritage assets' (§185a), including a number of historic buildings in the village and Thorpe Conservation Area, and have regard to Green Belt policy (§145). Day students arrive at the school in minibuses or by private car and there are currently 465-day students, however the school has a capacity for 850 students. The policy therefore also requires proposals to address 'the potential impacts of development on transport networks' (§102a) and specifically seeks to encourage walking and cycling which will also 'enable and support healthy lifestyles' (§91c).
TH4	Housing Mix	<p>The 'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies' (§61). The Forum's Housing Needs Assessment indicates a housing need in Thorpe in excess of that defined in Policy SD1 and a clear need for smaller dwellings with emphasis on 2 and 3 bed homes in the form of; discounted market sales and other affordable routes to home ownership, build to rent homes and downsizer dwellings. This aligns with the views expressed by the community that a proportion of new affordable homes (whether 'first homes', discounted market sales housing and/or other products such as 'build to rent') should enable newly forming households or young families who have a local connection to the designated area to secure their first home.</p> <p>The approach to affordable housing reflects that of the Local Plan but encouragement is given to landowners to consider community-led development as a means by which local needs housing may be delivered, which falls within the definition of affordable housing (NPPF Annex 2d). It is unfortunate that this cannot be made an explicit requirement in the policy (as the NPPF falls short of enabling such an approach), but there continues to be community support for such provision in Thorpe.</p>
TH5	High Quality Design	'Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development (§125). The

		<p>policy seeks to bring ‘clarity about design expectations’ in the area, as articulated in the Thorpe Heritage and Character Assessment (§126) to secure high quality design (§124). The specific matters included in the policy ‘provide a framework for creating distinctive places’ to deliver a ‘consistent and high quality standard of design’ (§126). When the Forum considers planning applications, these matters are those that in its experience lead to successful or unsuccessful design outcomes, and so they are ‘tailored to the circumstances’ in the area but ‘allow a suitable degree of variety’, which reflects the existing variety between character areas.</p>
TH6	Local Heritage Assets	<p>‘Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.’ (§185).</p> <p>The process for identifying buildings or structures as non-designated heritage assets is normally through the Borough Council’s Local List nomination process. The Borough Council’s Local List June 2019 study was undertaken in parallel following completion of the Thorpe Heritage and Character Assessment.</p> <p>The policy therefore seeks to ensure that any redevelopment schemes have regard to the local heritage value of these assets and identifies that local heritage value as merit for inclusion in the Local List in due course and for the application of Local Plan Policy EE8. The policy also sets out criteria that reflect that value to engage the provisions of §197.</p>
TH7	Green and Blue Infrastructure	<p>‘Plans should ... take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’ (§171). In addition, plans should ‘safeguard components of local wildlife-rich habitats and wider ecological networks’ (§174). The policy identifies a series of green and blue infrastructure attributes of the area that are especially important to its biodiversity value.</p> <p>‘Planning policies should ... provide for high quality walking and cycling networks’ (§104). The area also benefits from an extensive network of public rights of way and other informal walking, cycling and riding routes. The policy seeks to protect those routes from unnecessary loss or obstruction and to encourage suitably-located development schemes to respond positively to opportunities to improve route connectivity.</p>

TH8	Local Green Spaces	<p>'The designation of land as Local Green Space through ... neighbourhood plans allow communities to identify and protect green areas of particular importance to them' (§99). The policy seeks to designate two spaces and each space is considered to meet the tests of §100, as shown in the Evidence Report. Further, the policy does not unduly constrain the delivery of new development, as the village boundaries of Policy TH1 have made provision for such development of a scale that is in line with strategic policy.</p>
TH9	Community Facilities	<p>'To provide the social, recreational and cultural facilities and services the community needs, planning policies ... should ... plan positively for the provision and use of ... community facilities (and) guard against the unnecessary loss of valued facilities and services...ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community' (§92).</p> <p>The policy identifies those facilities in the area to which these objectives apply. It seeks both to protect but also to enhance those facilities providing a mechanism that will allow a partial change of use of a facility it secures longer-term viability.</p>
TH10	Mitigating Effects on European Sites	<p>'Planning policies ... should contribute to and enhance the natural and local environment by ... protecting and enhancing ... sites of biodiversity or geological value ... in a manner commensurate with their statutory status or identified quality in the development plan ... recognising ... the wider benefits from natural capital and ecosystem services ...' (§170).</p> <p>The policy does this by seeking to support the existing development plan in relation to mitigating effects on designated European Sites. Although the policy provisions repeat those of national and strategic policy, it is intended to draw attention to this specific matter and is not therefore an unnecessary duplication (§16).</p>
TH11	Water Infrastructure and Flood Risk	<p>'Non-strategic policies should be used by ... communities to set out more detailed policies for specific areas ... This can include ... the provision of infrastructure' (§28).</p> <p>'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk' (§149).</p>

		<p>Given the characteristics of the area, the policy provisions add local emphasis to those of national and strategic policy and are intended to draw attention to this key matter and is not therefore an unnecessary duplication (§16).</p>
--	--	---

3.5 It is considered that all of the policies have had full regard to national policy, with only one incidence (TH2i) of two or more national policies being in tension, in which case the Forum have struck an appropriate balance between them. As a result, the Neighbourhood Plan, as a whole, meets Condition (a).

#### 4.CONDITION (D): CONTRIBUTING TO ACHIEVING SUSTAINABLE DEVELOPMENT

4.1 Given the scope of the Plan it was agreed with the Borough Council in correspondence on 10 January 2019 that a Strategic Environmental Assessment (SEA) would be necessary in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004. The Forum is mindful of the EU Directive/Regulations and of the obligations of the Plan to meet the Basic Conditions (in terms of demonstrating it will 'contribute to the achievement of sustainable development'). It has therefore followed the statutory SEA process and it has chosen to undertake this as part of a wider Sustainability Appraisal (SA).The SA ensures that the Plan will meet the 'basic conditions' in respect of showing how the policies contribute to the achievement of sustainable development and of complying with the EU Directives 42/2001 and the 2004 Environmental Assessment of Plans and Programmes Regulations (see Section 6).

4.2 The Final SA Report confirms at paragarpgh 9.47 that:

*"The appraisal finds that the TNP should lead to significant positive effects in respect of Population and communities, on the basis that housing needs will be met and the proposed spatial strategy should secure delivery of a new park and a range of other community infrastructure upgrades, and minor positive effects in respect of Biodiversity and Climate change. However, minor negative effects are predicted in respect of Historic environment, and certain question-marks are raised in respect of landscape impacts, safe walking and cycling and traffic congestion."*

4.3 No further recommendations are made in the Final SA Report as the recommendations of the previous SA Report which accompanied the Regulation 14 Pre-Submission Plan have all been addressed and incorporated into the Submission version of the Plan.

## 5.CONDITION (E): GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN

5.1 The Neighbourhood Plan has been prepared to ensure its general conformity with the strategic policies of the development plan for the Borough, which at the time of drafting this statement are the saved policies of the adopted 2001 Local Plan whose policies predate the publication of the NPPF. In accordance with Planning Practice Guidance (§ 41-009), this Statement also seeks to demonstrate general conformity with the policies of the 2030 Local Plan as proposed to be adopted. The Inspector's report into the soundness of the Runnymede 2030 Local Plan was published on 1<sup>st</sup> June and confirms that the Plan is sound subject to Main Modifications, the policies in the Runnymede 2030 Local Plan therefore carry significant weight. The Borough Council confirmed in June 2020 that no policies from the 2001 Local Plan are proposed to be saved, this section of the Statement includes however an assessment against the 2001 Local Plan policies should this position change prior to the adoption of the new Local Plan in July 2020.

5.2 It is therefore anticipated that the Neighbourhood Plan will be examined solely against the policies of the new 2030 Local Plan, and for the reasons of amending the Green Belt boundary, following its adoption. The 'reasoning and evidence' of the 2030 Local Plan has therefore informed the preparation of the Neighbourhood Plan as this is crucial for the long-term success of the Plan given that in the event of any future conflict the most recent policy will take precedence.

5.3 This is all the more evident as the saved policies of the adopted Local Plan 2001 restricts development that conflicts with green belt purposes, except for the area within the settlement of Thorpe and allows some infilling and small-scale development inside a settlement boundary drawn for Thorpe. The 2030 Local Plan proposes to inset Thorpe village from the Green Belt, and in so doing define a village boundary and release land for development on the edge of the village which currently lies within the Green Belt. It also signals the need to review Green Belt boundaries in the Borough, which therefore provides the opportunity for the Neighbourhood Plan to consider detailed amendments to the Green Belt Inset boundary having regard to NPPF paragraph 136 and the requirements in paragraph 138 and 139. None of the other policies of the Neighbourhood Plan have required a balancing exercise to be undertaken in having regard to general conformity with strategic policy as none are considered to be inconsistent with strategic policy.

5.4 An assessment of the general conformity of each policy with both the current development plan, the 'adopted Local Plan 2001' (ALP) and the proposed to be adopted 2030 Local Plan (ELP), is contained in Table B below.

Table B: Neighbourhood Plan & Development Plan Conformity Summary

No.	Policy Title & Refs	Commentary
TH1	Thorpe Village Boundary	<ul style="list-style-type: none"> <li>• “Within the green belt except for the area within the settlement of Thorpe, there will be a strong presumption against development that would conflict with the purposes of the green belt or adversely affect its open character.” (ALP GB1)</li> <li>• “As set out in the table below, growth aspirations will largely be directed towards the most sustainable, larger settlements in Runnymede and towards the garden village at Longcross. These are considered to be the best locations for delivering supporting infrastructure as well as active and sustainable travel choices...Thorpe 89 net additional dwellings (including 11 completions and 28 dwellings deriving from the provision of C2 older persons accommodation...The expected growth deliveries for each settlement area as set out in the table within this Policy are minimum requirements. Further development within the Borough’s settlement areas will not be refused if, over the plan period, growth expectations have been exceeded for any settlement and provided development proposals are in accordance with other policies in this Plan.” (ELP SD1 MM14)</li> </ul> <p>Policy SD1 proposes to inset Thorpe village from the Green Belt. The policy does not attempt to revise the ways in which development plan policies apply to land within inset village boundaries or that in the Green Belt, it only updates the village boundary accommodating the allocation made in Policy TH2 (iii) in accordance with the provisions of the NPPF and development plan policies.</p>
TH2	<p>Site Allocation Policies</p> <ul style="list-style-type: none"> <li>• TH2(i) – Land off Rosemary Lane</li> <li>• Policy TH(ii) – Land off Green Road, Woodcock Hall Farm</li> <li>• Policy TH(iii) – Land East of Ten Acre Lane/North of Coldharbour Lane</li> </ul>	<ul style="list-style-type: none"> <li>• “Within the green belt except for the area within the settlement of Thorpe, there will be a strong presumption against development that would conflict with the purposes of the green belt or adversely affect its open character.” (ALP GB1)</li> <li>• “Essential facilities for outdoor sport and outdoor recreation, which preserve the openness of the green belt, will be permitted...etc” (ALP GB5)</li> <li>• “The Borough Council will, in consultation with the County Council, provide improved facilities for cyclists in both urban and rural areas and will co-operate to ensure that new routes are achieved. The Runnymede Cycle Strategy will be implemented in conjunction with Surrey County Council.” (ALP MV13)</li> <li>• “The Borough Council will, in consultation with the County Council, promote improved</li> </ul>

		<p>facilities for pedestrians in both urban and rural areas and will favourably consider pedestrianisation schemes and other means of improving pedestrian movement.” (ALP MV14)</p> <ul style="list-style-type: none"> <li>• The Council proposes that the minerals sites shown on the Proposals Map should be restored to a satisfactory after-use. The following are preferred after-uses...” (ALP NE7)</li> <li>• “The Council will promote the positive management and enhancement of areas of nature conservation value. Opportunities to secure such action, particularly by way of management agreements, will be pursued where appropriate.” (ALP NE18)</li> <li>• “The Council will require that all development (including new buildings, renovations, extensions, hard surfaces, walls and landscaping) preserves or enhances the character or appearance of the particular Conservation Area. In this regard the Council will give consideration to the following criteria:...etc.” (ALP BE5)</li> <li>• “The Council will in most cases require proposals affecting listed buildings to meet the following criteria...etc” (ALP BE9)</li> <li>• “...The Council will encourage the provision of facilities where deficiencies exist if this is appropriate and feasible.” (ALP R1)</li> <li>• “As set out in the table below, growth aspirations will largely be directed towards the most sustainable, larger settlements in Runnymede and towards the garden village at Longcross. These are considered to be the best locations for delivering supporting infrastructure as well as active and sustainable travel choices...Thorpe 43 net additional dwellings, 17 dwellings deriving from the provision of C2 older persons accommodation...The expected growth deliveries for each settlement area as set out in the table within this Policy are minimum requirements. Further development within the Borough’s settlement areas will not be refused if, over the plan period, growth expectations have been exceeded for any settlement and provided development proposals are in accordance with other policies in this Plan.” (ELP SD1)</li> <li>• “The Council will support development proposals which maintain or enhance the efficient and safe operation of the highway network and which take account of the needs of all highway users for safe access, egress and servicing arrangements....” (ELP SD5)</li> <li>• “The Council is supportive of development that promotes community facilities and provides access to cultural experiences...” (ELP SL1)</li> <li>• “Development proposals of 10 or more (net) additional dwellings will be required to contribute to meeting the Housing Market Area’s identified housing needs by generally providing a housing mix as set out in the Strategic Housing Market Assessment or any similar evidence for market and affordable units...” (ELP SL19)</li> <li>• “Over the period of the Local Plan the Council will seek to deliver 30% of all net additional</li> </ul>
--	--	--

		<p>         dwellings as affordable units of which about 70% will be provided as Affordable/Social Rent and 30% as other forms of affordable housing..." (ELP SL20)       </p> <ul style="list-style-type: none"> <li>• "The Council will require residential developments of 20 dwellings (net) or more to provide new or enhanced provision of open space...etc" (ELP SL26)</li> <li>• "Whether within the Borough's urban areas or Green Belt, all development proposals will be expected to achieve high quality design and inclusive design which responds to the local context including the built, natural and historic character of the area. while making efficient use of land. ..." (ELP EE1)</li> <li>• "Development that affects Runnymede's heritage assets should be designed to protect, conserve and enhance the significance and value of these assets and their settings in accordance with national legislation, policy and guidance and any supplementary planning documents which the council may produce..." (ELP EE3)</li> <li>• "...All additional residential development (including strategic allocations) beyond the 400m Special Protection Area exclusion zone, but within 5km of the Special Protection Area boundary, will need to put in place adequate measures to avoid and mitigate potential effects on the Special Protection Area....etc" (ELP EE10)</li> <li>• "In accordance with the National Planning Policy Framework, the provision of facilities for outdoor sport, outdoor recreation and for cemeteries, burial grounds and allotments may not be inappropriate in the Green Belt provided such provision preserves the openness of the Green Belt and does not conflict with the purposes of including land within it..." (ELP EE16)</li> </ul> <p>         Additionally, the Borough Council's Runnymede 2030 Site Selection Methodology and Assessment Final, Dec 2017 sets out in its paragraph 4.60:       </p> <p>         "... to help in the identification of which sites could be released the following criteria were also considered:       </p> <ul style="list-style-type: none"> <li>• Cumulative impact when considered with other sites against the settlement hierarchy and/or whether the total or cumulative area of Green Belt for release is proportionate to the amount of land which is actually developable;</li> <li>• Whether the site forms a 'rounding off' of a settlement edge or is infill, to ensure settlements remain compact and protect the Green Belt from further fragmentation;..."</li> </ul> <p>         Paragraph 5.2 above demonstrates why Policy SD1 applies when looking at the 'housing requirement figure' (§65) for the designated neighbourhood area. The figure is identified as a minimum of 89 over the plan period, 46 of these have already been delivered, or are       </p>
--	--	---

		<p>commitments considered to count towards this figure. The figure provided in SD1 is a minimum requirement and the housing trajectory provided by RBC has been corrected to include an additional requirement of 16 C3 dwellings (see Table A) to correct the oversupply of C2 dwellings at CEMEX that makes up part of the trajectory. Together, these allocation policies will deliver 74 new homes and are therefore considered to be in general conformity with Policy SD1.</p> <p>The policy also accords with each of the environmental and heritage policies and in some cases supplements them to draw specific attention to key mitigation measures. None of the policies has had to be compromised in any significant way, although the Sustainability Appraisal accepts that there will remain a degree of residual landscape and heritage harm that is inevitable in allocating a greenfield site on the edge of the village.</p> <p>In respect of housing mix, the evidence gathered during the preparation of the Plan indicates that there is an imbalance in Thorpe’s housing stock. In defining special emphasis is given to delivering 2 and 3 bed homes and discouraging social rented housing in Thorpe, the policy gives priority to meeting the housing need of different groups.</p> <p>Encouragement is offered to the landowner, a future developer and Community Land Trust to agree a means by which the Trust is a delivery partner. It is unfortunate that this cannot be made a requirement in the policy – the Local Plan makes no provision for such initiatives – but the Borough Council has indicated support for such initiatives.</p>
TH3	TASIS School	<ul style="list-style-type: none"> <li>• <i>“...Schemes which make provision for the accommodation of small firms and local firms wishing to expand will be particularly encouraged. However, the council would wish to avoid proposals that had adverse environmental and traffic consequences or gave rise to significant pressure for housing or other inappropriate development in the green belt.” (ALP LE1)</i></li> <li>• <i>“To attract businesses to the Borough; support the retention, creation and development of local businesses, promote business competitiveness and allow for flexibility to cater for the changing needs of the economy, the Council will...etc” (ELP EI3)</i></li> </ul> <p>Although there are no provisions for TASIS School specifically the policy is consistent in its provisions for supporting local employers and facilities with extant and forthcoming development plan policy. Its provisions are also consistent with adopted and emerging strategic policy on heritage assets in relation to the Thorpe Conservation Area, the many listed buildings and locally listed buildings in the area.</p>

TH4	Housing Mix	<ul style="list-style-type: none"> <li>• “To accommodate those groups identified in the housing needs survey whose aspirations for housing cannot be met by housing generally available on the open market 524 units of affordable housing will need to be provided over the next five years by a variety of ways....Arrangements will be made that seek to ensure that such housing is available for those identified in the Council’s survey as being in need.” (ALP HO4)</li> <li>• “Development proposals of 10 or more (net) additional dwellings will be required to contribute to meeting the Housing Market Area’s identified housing needs by generally providing a housing mix as set out in the Strategic Housing Market Assessment or any similar evidence for market and affordable units...” (ELP SL19)</li> <li>• “Over the period of the Local Plan the Council will seek to deliver 30% of all net additional dwellings as affordable units of which about 70% will be provided as Affordable/Social Rent and 30% as other forms of affordable housing...” (ELP SL20 MM39)</li> <li>• Development proposals of 10 or more (net) additional dwellings will be expected to provide 35% of dwellings as affordable units with a tenure split as above which includes 10% of homes for affordable home ownership (starter homes, discounted market sales housing and/or other products which provide affordable routes to home ownership in line with the definition contained in the 2019 8 NPPF)...” (ELP SL20 MM39)</li> </ul> <p>The policy refines Policy HO4 and in due course Policies SL19 and SL20. The Forum’s Housing Needs Assessment indicates a housing need in Thorpe in excess of that defined in Policy SD1 and a clear need for smaller dwellings with emphasis on 2 and 3 bed homes in the form of; discounted market sales and other affordable routes to home ownership or renting and downsizer dwellings. This aligns with the views expressed by the community that a proportion of new affordable homes whether for sale or rent should enable newly forming households or young families who have a local connection to the designated area to secure their first home.</p> <p>The policy also encourages consideration of the delivery of local needs housing through a Community Land Trust, or equivalent body. It is unfortunate that this cannot be made a requirement in the policy – the Local Plan makes no provision for such initiatives – but the Borough Council has indicated its general support for such initiatives.</p>
TH5	High Quality Design	<ul style="list-style-type: none"> <li>• “Within the urban area proposals will be expected to respect townscape character of recognised high quality by reference to the following issues...etc” (ALP BE1)</li> <li>• “Whether within the Borough’s urban areas or Green Belt, all development proposals will</li> </ul>

		<p>be expected to achieve high quality and inclusive design which responds to the local context including the built, natural and historic character of the area, while making efficient use of land. In particular, development proposals will be supported where if they:etc” (ELP EE1)</p> <p>The policy refines BE1 and EE1 by identifying specific design features in Thorpe and by cross referring to the character appraisal to engage Policy EE1 in due course. Its provisions are also consistent with adopted and emerging strategic policy on heritage assets in relation to the Thorpe Conservation Area and the many listed buildings in the area.</p>
TH6	Local Heritage Assets	<ul style="list-style-type: none"> <li>• “...Proposals that detrimentally affect the character or appearance of a locally listed building, or its setting, will not normally be acceptable.” (ALP BE13)</li> <li>• “...Development will be required to preserve the character and significance of locally listed and other non-designated heritage assets, their setting and any features of architectural or historic interest. The historic landscape of the Borough should be respected, taking into account locally distinctive settlement patterns, hedgerows, woodlands and canals...” (ELP EE8)</li> </ul> <p>The Thorpe Heritage and Character Assessment identifies and describes the value of these non-designated heritage assets in the area. By identifying and assessing these non-designated heritage assets, it engages the above extant and forthcoming development plan policy.</p>
TH7	Green and Blue Infrastructure	<ul style="list-style-type: none"> <li>• “The Borough Council will, in consultation with the County Council, provide improved facilities for cyclists in both urban and rural areas and will co-operate to ensure that new routes are achieved. The Runnymede Cycle Strategy will be implemented in conjunction with Surrey County Council.” (ALP MV13)</li> <li>• “The Borough Council will, in consultation with the County Council, promote improved facilities for pedestrians in both urban and rural areas and will favourably consider pedestrianisation schemes and other means of improving pedestrian movement.” (ALP MV14)</li> <li>• “The Council will promote the positive management and enhancement of areas of nature conservation value. Opportunities to secure such action, particularly by way of management agreements, will be pursued where appropriate.” (ALP NE18)</li> <li>• “...The Council will seek net gains in biodiversity, through creation/expansion, restoration, enhancement and management of habitats and features to improve the status of priority habitats and species. Development proposals should demonstrate how this will be</li> </ul>

		<p>achieved and should be in accordance with any Supplementary Planning Document the Council prepares...etc.” (ELP EE9)</p> <ul style="list-style-type: none"> <li>• “The Council will seek to avoid further habitat fragmentation of Green Infrastructure by encouraging development proposals which restore, maintain and enhance habitat connectivity, in particular in Biodiversity Opportunity Areas as shown on the policies map...etc” (ELP EE11)</li> <li>• “The local planning authority will require applicants to contribute towards the delivery of a high quality multi-functional Blue Infrastructure network by expecting Blue Infrastructure assets to be provided, protected, maintained and enhanced to deliver multiple benefits and services for biodiversity, recreation and landscape...etc” (ELP EE12)</li> </ul> <p>The policy is consistent, and refines, these policies to acknowledge the extent of the existing Green and Blue Infrastructure Network, including biodiversity, in the area.</p>
TH8	Local Green Spaces	<ul style="list-style-type: none"> <li>• “The Council will give special protection to sites designated as Local Green Space as shown on the Policies Map. Within a designated Local Green Space development will not be permitted other than development which supports the use of the Local Green Space or where very special circumstances can be demonstrated and which outweigh the harm to the Local Green Space.” (ELP SL27)</li> </ul> <p>Although there is no current development plan provision for designating Local Green Spaces, the policy is consistent with emerging Local Plan policy in terms of designating Local Green Spaces.</p>
TH9	Community Facilities	<ul style="list-style-type: none"> <li>• “The Council will resist development proposals which would result in the loss or reduced availability of existing open spaces and buildings (without their replacement on alternative sites acceptable to the council) which make a valuable contribution to recreation and leisure facilities in the Borough. The Council will encourage the provision of facilities where deficiencies exist if this is appropriate and feasible.” (ALP R1)</li> <li>• “The loss or change of use of existing social and community infrastructure facilities or sites will be resisted unless it can be demonstrated that demand can be met from alternative provision which has the capacity to provide facilities through co-location or provision of new facilities...etc” (ELP SD6)</li> </ul> <p>The policy identifies those community facilities in the area and is consistent with the policies in its requirements of development proposals. It adds further provisions to protect and ensure longer-term viability of those facilities and supports their expansion.</p>

TH10	Mitigating Effects on European Sites	<p>Policy NRM6 of the South East Plan which is concerned with development near the Thames Basin Heaths Special Protection Area forms part of the development plan and is relevant here:</p> <ul style="list-style-type: none"> <li>• “New residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be agreed with Natural England...etc)</li> <li>• “...Proposals for development of land use which may affect a European Site, a proposed European site or a Ramsar site will be subject to the most rigorous examination. Development or land use change not directly connected with or necessary to the management of the site and which is likely to have significant effects on the site (either individually or in combination with other plans or projects) will not be permitted unless...etc” (ALP NE16)</li> <li>• “Development proposals not directly related to the management of Ramsar, SPA, SAC as well as SSSI units forming part of these designations will not be permitted unless it can be demonstrated that the impact of proposals, either alone or in combination, will not result in likely significant adverse effects. If significant adverse effects remain even with the implementation of suitable avoidance and/or mitigation, development proposals will need to demonstrate that alternatives to the proposal have been fully explored and that Imperative Reasons of Overriding Public Interest (IROPI) exist. In these exceptional circumstances the Council will only permit development where suitable compensatory measures can be implemented. For development proposals that affect national, regional or locally protected sites not forming part of a Ramsar, SPA or SAC, permission ....etc” (ELP EE9)</li> <li>• “...All additional residential development (including strategic allocations) beyond the 400m Special Protection Area exclusion zone, but within 5km of the Special Protection Area boundary, will need to put in place adequate measures to avoid and mitigate potential effects on the Special Protection Area....etc” (ELP EE10)</li> </ul> <p>The policy supports the provisions of these adopted and emerging development plan policies in respect of mitigating effects on European Sites. Although the Forum recognises that the policy does not materially differ from the adopted and emerging development plan, it considers the issue is of such importance the local community will expect to see a policy on the matter in the Neighbourhood Plan.</p>
------	--------------------------------------	--

TH11	Water Infrastructure and Flood Risk	<ul style="list-style-type: none"> <li>• “The Council in conjunction with the Environment Agency, will seek to manage the floodplain environment and achieve appropriate flood alleviation in the Borough.” (ALP SV1)</li> <li>• “Within the area liable to flood as shown on the Proposals Map, development will not normally be permitted for new residential or non-residential development, including extensions, unless it can be demonstrated to the satisfaction of the Borough Council, following consultation with the Environment Agency, that the proposal would not of itself, or cumulatively in conjunction with other development...etc” (ALP SV2)</li> <li>• “The Council will resist development which in its opinion, after consultation with the Environment Agency, could adversely affect the quality of surface water or groundwater.” (ALP SV2A)</li> <li>• “...Development proposals, including those allocated in this plan which give rise to a need for infrastructure improvements, will be expected to mitigate their impact, whether individually or cumulatively, and at a rate and scale to meet the needs that arise from that development or a phase of that development, while also taking account of other developments outside Runnymede that require mitigation from infrastructure schemes proposed within the Borough. The standards of infrastructure delivery will be expected to comply with other policies set out within this Plan...etc” (ELP SD5)</li> <li>• “New development will be guided to areas of lowest flood risk from all sources of flooding through the application of the sequential test. A sequential approach to the layout on individual development sites will also be expected to be followed to minimise flood risk. The exception test will continue to be applied where national planning policy advises that this is necessary...etc” (ELP EE13)</li> </ul> <p>The policy is consistent with the provisions of these adopted and emerging strategic policies in respect of its requirements of water infrastructure.</p>
------	-------------------------------------	--

5.4 It is considered that all of the policies are in general conformity with the strategic policies of the adopted and emerging development plan, with no incidence of two or more strategic policies being in tension, nor of the Forum having to strike a balance between them. As a result, the Thorpe Neighbourhood Plan, as a whole, meets Condition (e).

## 6. COMPATABILITY WITH EU LEGISLATIONS

6.1 As set out in Section 4 the Forum has met its obligations in relation to the EU Directive on the requirement of a Strategic Environmental Assessment (SEA). As the Forum confirmed that it would be preparing a Sustainability Appraisal (SA) (incorporating a SEA) it was not considered that a screening opinion was necessary, and subsequent scoping stage was undertaken appropriately and the views of statutory consultees sought, as detailed in the separate SA/SEA report published as part of the submission documentation.

6.2 The Borough Council have also confirmed that the plan will require a Habitats Regulations Assessment due to the potential impact of the proposed policies on European designated sites in proximity to Thorpe. This has been undertaken in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended). The necessary technical evidence and reports have been prepared to enable the Borough Council, as the competent authority, to carry out an Appropriate Assessment and is submitted alongside the Submission Plan.

6.3 The Plan has also had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. The Plan has been subject to extensive engagement with those people local to the area who could be affected by its policies and their views have been taken into account in finalising the Plan.