

# **The Runnymede Borough Council response to the Thorpe Neighbourhood Plan at Regulation 16 Consultation**

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## **1. The purpose of this document**

The purpose of this document is to set out supporting information for the examination of the Thorpe Neighbourhood Plan and to provide a statement from Runnymede Borough Council.

## **2. Legal requirements**

Runnymede Borough Council officers have reviewed the submitted documents against the requirements of Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and relevant legislation and are satisfied that the required documents have been submitted, and that the requirements of the Town and Country Planning Act 1990 (as amended) have been met.

## **3. Statement from Runnymede Borough Council**

Runnymede Borough Council welcomes the opportunity to comment on the Thorpe Neighbourhood Plan under Regulation 16. The Borough Council strongly supports and advocates the Neighbourhood Planning Process and has a number of plans being drafted in its own administrative area, together with the formation of new areas and forums.

Council Officers have worked closely with the Thorpe Neighbourhood Forum (TNF) to assist them in reaching this stage of the Neighbourhood Planning process. An immense amount of time, effort and hard work has gone into the preparation and revision of the neighbourhood plan (since Regulation 14) that supports the community's ambitions for the Thorpe Neighbourhood Area; and as such the Council commends the work of the Neighbourhood Forum.

### Policy TH4

At the Regulation 14 pre-submission consultation stage of the TNP, officers commented on Policy TH4 (Housing Mix and Type, including affordable housing) wording, recommending that it should be clearer and more precise in its policy requirements to ensure it is consistent with the (then) emerging Local Plan Policy SL20 and that the TNP policy does not conflict with (emerging) strategic policy.

References made in respect to a local connection test to the village for new homes, also required further consideration as to how this would interact with the Council's Housing Allocation Policy.

These matters have been addressed by the TNF in their submission Neighbourhood Plan in the following way: the TNF decided not to pursue the local allocations policy and for completeness, Policy TH4 was amended to ensure that the mix of housing sought was compliant with Local Plan Policies SL19/20 in terms of numbers/thresholds.

## Policy TH2 (iii): Land East of Ten Acre Lane

Policy TH2(iii) seeks to allocate 13.57 hectares (ha) of land east of Ten Acre Lane including the release of land from the Green Belt, over and above that released through the Runnymede 2030 Local Plan. On its adoption on 16<sup>th</sup> July 2020, the Local Plan has established the need for changes to the Green Belt boundaries at a strategic level. As such, the Council is of the opinion that paragraph 136 of the NPPF can be engaged by the Thorpe Neighbourhood Forum.

The TNP Green Belt Exceptional Circumstances Note (June 2020) seeks to identify the relevant exceptional circumstances for releasing the site from the Green Belt. The exceptional circumstances identified at Thorpe are similar to those accepted by the Inspector for the RBC Local Plan and include the heavily constrained nature of the borough/neighbourhood area, limited capacity of previously developed land outside of the Green Belt and identified need for new market and affordable homes. Locally specific to Thorpe are also protection of historic character, need for facilities for sports and young people/children, and public car parking to reduce pressure on parking within the historic village core. Collectively these factors are considered by the TNF to demonstrate and justify the exceptional circumstances for a non-strategic release of additional Green Belt land at Thorpe. The Council is satisfied that the proposal complies with paragraph 136 of the NPPF. The Council would also note that the Neighbourhood Area is heavily constrained by various conservation, flooding and environmental constraints.

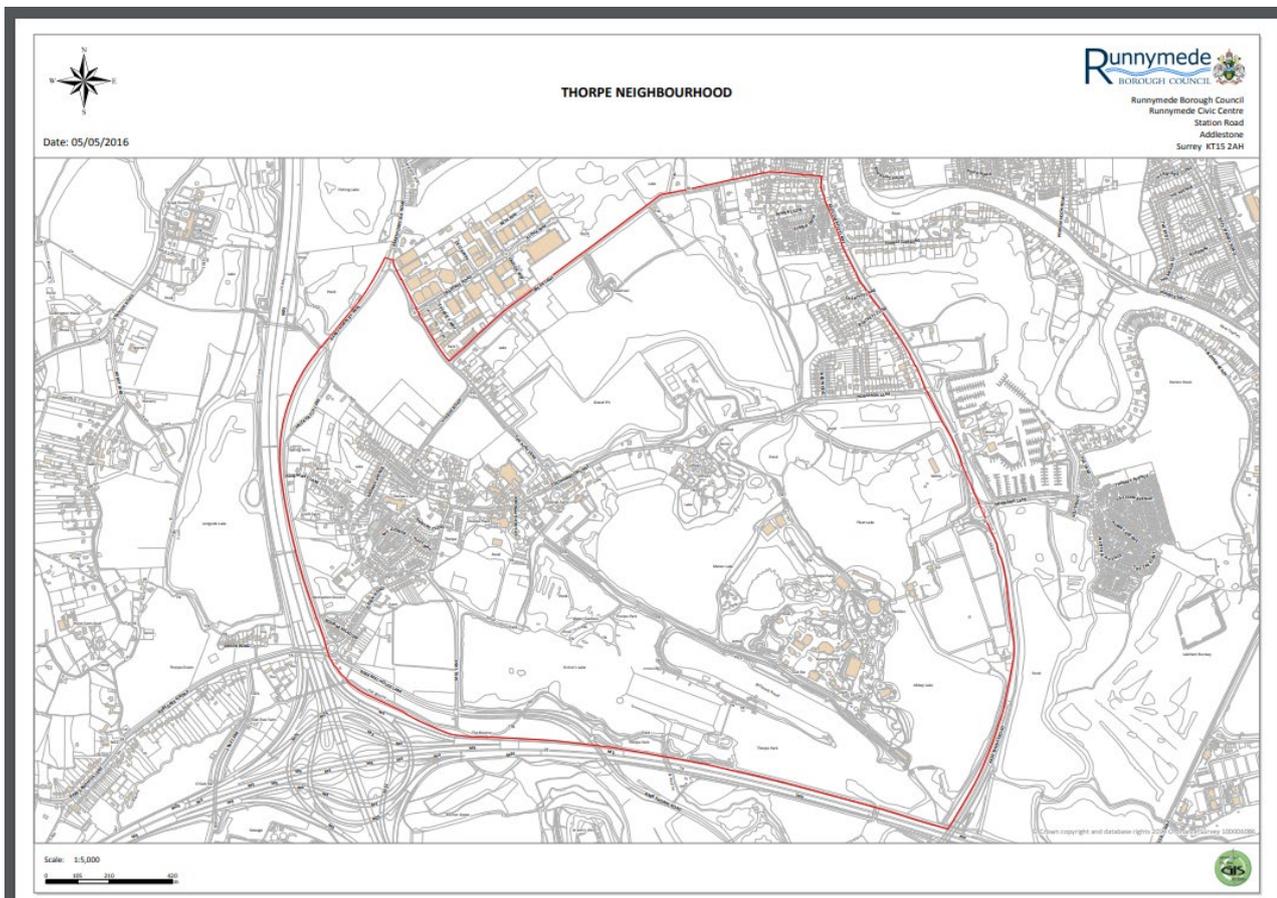
### **4. Information to support the examination**

#### **Location of the plan area**

The Thorpe Neighbourhood Forum (TNF) and area was formally designated by Runnymede Borough Council on 24<sup>th</sup> August 2016.

The map below shows the designated Neighbourhood Area. Please also refer to link (scroll down to the bottom of the page): <https://www.runnymede.gov.uk/article/15578/Thorpe-Neighbourhood-Plan>

Further information about the plan area can be found within the submitted Plan- see link: <https://www.runnymede.gov.uk/article/15578/Thorpe-Neighbourhood-Plan> and then click onto the plan-page 6.



## Description of the plan area

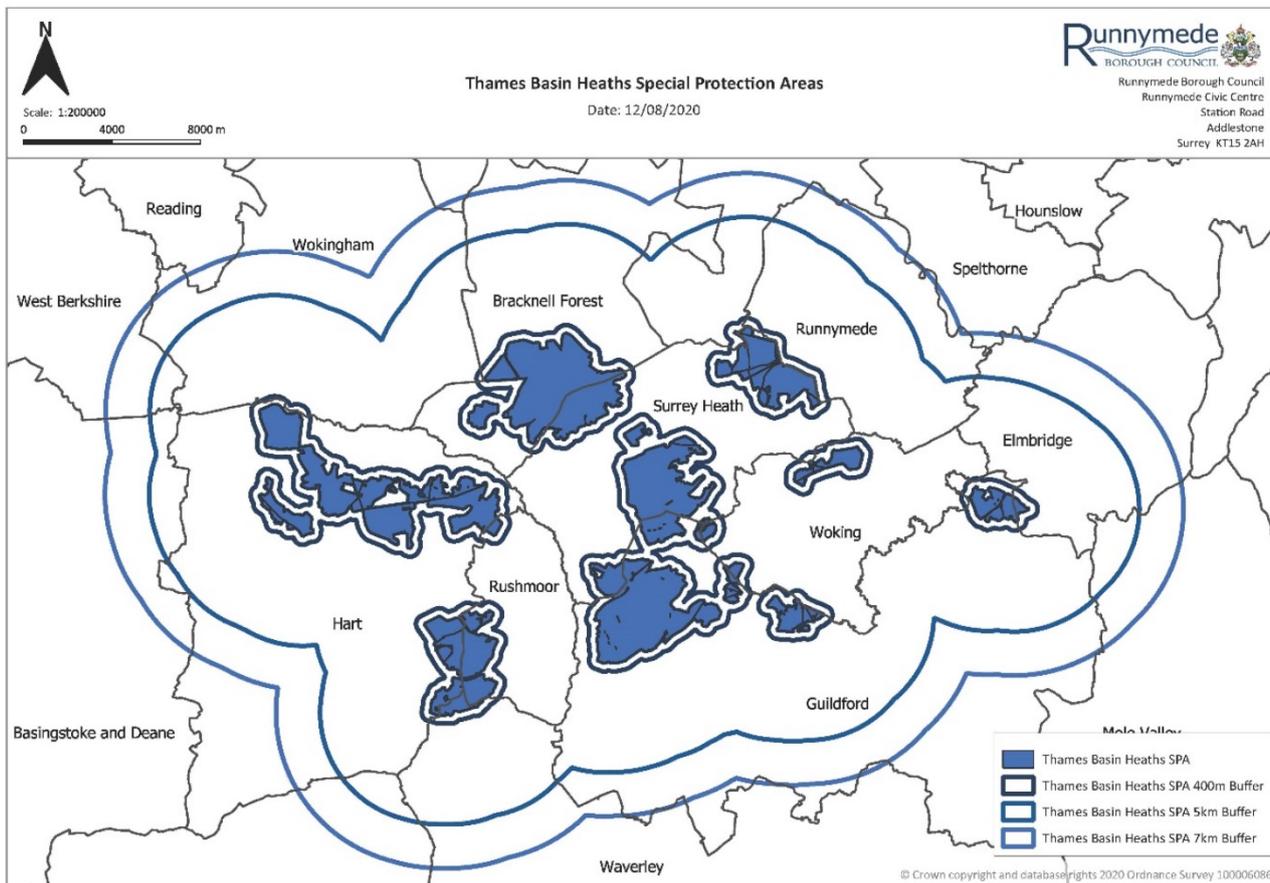
The historic village of Thorpe is located in the administrative area of Runnymede Borough Council and forms part of the Thorpe Ward. The majority of the neighbourhood plan area is located within the Green Belt, with the exception of Thorpe Village and existing residential areas located immediately to the West of the A320.

The village lies immediately to the east of the M25 motorway with its interchange with the M3 and is located between the main towns of Egham, Staines upon Thames and Chertsey, the latter being the closest neighbour. Heathrow Airport is approximately 10 miles away. Other neighbouring settlements include Thorpe Lea/Egham Hythe, Lyne, Virginia Water, Trumps Green, Stroude and Longcross.

Further detail about the settlement is detailed in Section 2 of the Submission Neighbourhood Plan <https://www.runnymede.gov.uk/article/15578/Thorpe-Neighbourhood-Plan>

## Special Protection Areas

The Thames Basin Heaths (TBH) comprise over 8,000 ha of heathland sites located across Surrey, Hampshire and Berkshire (refer to the map below) and forms part of a Natura 2000 network of sites of international importance to nature conservation, established under the Habitats directives.



Located only 30 miles to the south west of London on the M3/A3 corridor, over the last century the Heaths have become significantly fragmented, reduced in size and subjected to urban development pressures, including pollution and uncontrolled heathland fires.

The Thames Basin Heaths account for around two-thirds (approximately 2,000 ha) of Surrey's remaining heathland<sup>1</sup> and were designated on 9<sup>th</sup> March 2005 as a Special Protection Area (SPA) for internationally important birds.

Approximately two-thirds of the Borough of Runnymede lie within the SPA's 5km buffer zone. An SPD is currently being prepared to provide an updated avoidance and mitigation strategy to demonstrate how the adverse effects of development on the integrity of the Thames Basin Heaths SPA within Runnymede should be avoided and mitigated. This is essential to protect the Heaths from recreation-related harm and to permit a net increase of residential development between 400m and 5km of the SPA, whilst also ensuring that the Council is in line with the adopted Local Plan.

The Thorpe Park No. 1 Gravel Pits SSSI lies within the Thorpe NPA. Also located within proximity are Staines Moor SSSI, Wraybury and Hythe End Gravel Pits SSSI, Wraybury Reservoir SSSI and Wraybury No. 1 Gravel Pit SSSI. These all form part of the South West London Waterbodies SPA and Ramsar.

<sup>1</sup> [https://www.surreycc.gov.uk/data/assets/pdf\\_file/0020/49421/Heathland-GuideR.pdf](https://www.surreycc.gov.uk/data/assets/pdf_file/0020/49421/Heathland-GuideR.pdf)

## South East Plan (2009)

Although the South East Plan was partially revoked on 25<sup>th</sup> March 2013, Policy NRM6, which deals with the Thames Basin Heaths Special Protection Area, remains in place. This sets out the principle of the protection of the Thames Basin Heaths SPA in the South East. The Habitats Regulations 2010 and saved policy NRM6 of the South East Plan require that when new dwellings are created within this zone, avoidance measures in the form of Suitable Alternative Natural Green Space (SANG), and mitigation measures in the form of a contribution to the Strategic Access Management and Monitoring (SAMM) project, must be provided. SANGs are alternative recreation spaces that soak up increased recreational pressure on the SPA brought by new housing. The SAMM project delivers access management measures for the SPA.

Please see the Council's webpage for further information:

<https://www.runnymede.gov.uk/article/15568/Thames-Basin-Heaths-Special-Protection-Area-TBH-SPA-policy-documents-and-guidance->

## Strategic Context

### Current Local Plan

The Council adopted the 2030 Local Plan on the 16<sup>th</sup> July 2020 which now forms part of the Development Plan for the Borough. The policies within the Runnymede 2030 Local Plan replace all of the remaining saved policies from the Runnymede Local Plan 2001 (second alteration). All saved Borough Plan policies not replaced were withdrawn on adoption of the Runnymede 2030 Local Plan.

The Runnymede 2030 Local Plan sets out the key planning policies which determine the location, scale and timing of new development in the Borough in the period up to 2030, including the spatial development strategy, allocations for housing, employment and retail development and protection of the environment. The Local Plan also contains a suite of planning policies against which planning applications in the Borough will be determined.

Further information about the Plan is detailed here: <https://www.runnymede.gov.uk/localplan>

To summarise, the current development plan for Runnymede Borough Council is made up of the following:

- The Runnymede 2030 Local Plan (adopted July 2020);
- Surrey Minerals Plan Core Strategy Development Plan Document (DPD) (2011);
- Surrey Minerals Plan Primary Aggregates Development Plan Document (DPD) (2011);
- Aggregates Recycling Joint Development Plan Document (DPD) for the Minerals and Waste Plans (2013);
- Surrey Waste Plan (2008) and
- Policy NRM6 of the South East Plan

The preparation of a Minerals and Waste Plans is the responsibility of Surrey County Council, although the Borough Council is an important consultee. The Surrey Waste Plan is currently being reviewed with the new Surrey Waste Plan timetabled for adoption during 2020. For further details please refer to the County Council's website: <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste>

## **Neighbourhood Planning**

Neighbourhood plans must be in general conformity with the strategic policies in the Local Plan. There are no town and parish councils within the Borough, however, there are now several formally constituted neighbourhood forums and designated neighbourhood plan areas where new neighbourhood plans are being brought forward. These include Thorpe, Virginia Water and Englefield Green. Ottershaw is currently undergoing consultation to become a designated neighbourhood area and forum. For further information on neighbourhood planning in the Borough please refer to the Council's webpage: <https://www.runnymede.gov.uk/neighbourhood-planning>

The Council's Local Development Scheme can be viewed here:

<https://www.runnymede.gov.uk/article/15515/Local-Development-Scheme-LDS->

## **Community Infrastructure Levy**

The Council is proposing to submit its Community Infrastructure Levy (CIL) draft charging schedule for examination by the end of August with Examination anticipated in Autumn 2020 and implementation by 1st March 2021. For further information about CIL please refer to the Council's webpage: <https://www.runnymede.gov.uk/article/15518/Community-Infrastructure-Levy-CIL->