

Thorpe Neighbourhood Development Plan 2015 -2030

Initial Comments of the Independent Examiner

Prepared by

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14th September 2020

Introductory Remarks

1. As you will be aware, I have been appointed to carry out the examination of the Thorpe Neighbourhood Plan. I have carried out my initial review of the Plan and most of the accompanying documents which I have been sent. I visited Thorpe village on Thursday 10th September 2020, spending the afternoon visiting all the sites and I enjoyed a walk across a number of the open spaces in the village. I also saw the relationship with the surrounding settlements of Chertsey, Virginia Water and Egham.
2. My preliminary view is that I should be able to deal with the examination of this Plan by the consideration of the written material only. I do still have to reserve the right to call for a public hearing, if I consider that it will assist my examination, but I consider that is very unlikely. If I did have to call one it would have to be via a video conference call in the current climate.
3. However, there are a number of matters that I wish to receive either clarification or further comments from the Neighbourhood Forum or in some cases from Runnymede Borough Council. Such requests are quite normal during the examination process and will help me prepare my report and come to my conclusions.

Regulation 16

4. I would like to offer the Forum the opportunity to comment on the representations that were submitted as part of the Regulation 16 consultation. It is only necessary to respond to those matters which offer comment or objection, as it sees fit.

Documentation Issues

5. I have to admit to having some concerns and reservations regarding the mapping, both in terms of consistency and its presentation in respect of ease of use by users of the plan, and decision makers in particular. It would improve the clarity of the proposals, if the maps could be presented at a larger scale. It would also assist if the definition of the OS base map could be enhanced to identify which properties and land are covered by designations.
6. I would recommend that the maps should be presented at A4 size, namely Plans A, B, C, D, and E- plus The Thorpe Constraints Plan, Thorpe Scenario 2, both Policies Map and the Green and Blue infrastructure Plan. Would Runnymede planners be able to assist with these?
7. It would be helpful if the 2 Local Green Spaces were included on the Policies Map and also the non designated heritage assets, in both cases so as to define the extent of their coverage, which is particularly an issue in terms of Woodcock Farm and also the Old Pond Enclosure and the LGS at The Gower.

8. I would also request that the location of the key views as described in Policy TH5 and show the particular viewpoint to be protected, be also added to the Policies Map.
9. There appears to be a discrepancy in the Policies Map, which currently shows the residential areas in the north east corner of the plan area, to the west of Chertsey Road as being within the Green Belt on the Policies Map, which is not consistent with the Local Plan .
10. Policy TH5 refers to Character Areas A and B - could the key to the Policies Inset Map be amended to refer to Character Areas rather than High Quality Design Areas? Does the neighbourhood plan offer design guidance or expectations for the areas outside these two areas?
11. Policy TH5 seek to retain or reprovide *incidental open space*- what I am not clear is whether these areas could or should be identified on a map, so there is clarity as to whether specific pieces of land are included – does it include only public land or can it include private land, and even land within a residential curtilage. Are these areas different to the areas covered by Policy TH7 covering the green Infrastructure Policy Map shown as light green?

Site Allocations

12. I see from the concept plan that the proposed allocation set out in Policy TH2 (i) shows access coming in from the south, which presumably, will require the demolition of the substantial property, Coltscroft and the current access to the north is shown as a pedestrian route only. Is there a reason that the vehicular use of the current access to the north is discounted ? Is the Highway Authority agreeable for a shared access to be proposed for this number of units ?
13. Another issue which applies to the allocations, is that the policy wording refers to “ primary consideration to be given to first time buyers and those looking to rent their first home” or in the case of Woodcock Hall Farm, the provision of “single storey downsizer housing”. Is the expectation that residency on these sites should be restricted, in some way, by planning condition or planning undertaking or is the approach to be as suggested in Policy TH4, which refers to the buildings being *suitable* for these particular sectors of the housing market will be *encouraged*?
14. In terms of the Woodcock Hall Farm allocation, are the barns and other wooden buildings covered by the farms’ proposed designation as a non-designated heritage asset in Policy TH6 or does that just refer to the farm house. It appears from the Character Assessment that they are included , yet the policy seems to imply that redevelopment and hence their removal is a clear option.
15. I appreciate the arguments being advanced in favour of In terms of the site covered by Policy TH2(iii), but I would like to understand how that site to be released from the Green Belt was chosen. Was there a systematic review of

other sites, which adjoin the built up area considered and could other sites provide similar benefits?

16. Has any thought been given to the possible phasing of the community benefits as once the housing site is removed from the Green Belt upon the making of the plan, then the policy presumption would be in favour of housing on that site as per Policy TH1? Is there a need for the policy to include reference to a phasing plan to ensure the other proposals are delivered in step with the housing?

Community Facilities

17. Can the Forum describe what criteria it used to determine which facilities should be protected as Community Facilities. In particular, I will need clear justification as to why the commercial facilities at Thorpe Park Resort are used by the Thorpe Community, as in my experience, this facility has a much larger catchment which serves a hinterland of at least an hours drive. Similarly how does TESIS, which is described as a very private school, justify the proposed status as community facilities that need to be protected by neighbourhood plan policy?
18. Does Runnymede Council have any views as to how this policy needs to be updated following the recently introduced changes to the Use Classes Order?
19. How do Thorpe Lakes provide community facilities, beyond being part of the plan's Blue Infrastructure, protected by Policy TH7?
20. Are any of the community facilities designated as Assets of Community Value?

Policy TH11: Water Infrastructure and Flood Risk

21. The Secretary of State in a Written Statement to the House of Commons dated 25th March 2015 stated that "neighbourhood plans should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings". I would welcome the views of the Forum and the LPA, whether the requirements to achieve a water efficiency standard is indeed imposing such a technical requirement.
22. Can the LPA confirm that the requirement to submit a Flood Risk Assessment is a requirement of the Local Validation Checklist.
23. Can the Forum clarify how it sees the sequential approach set out in criteria iii would work – is it actually seeking an assessment of alternative layouts or is the existing national requirement to demonstrate that there are no alternative sites that could be developed based on the sequential approach to site selection in areas at risk of flooding?

Concluding Remarks

21. I am sending this note direct to the Thorpe Neighbourhood Forum , as well as Runnymede Borough Council. I would request that both parties' responses to my questions should be sent to me by 5 pm on **1st October 2020**.
22. I would also request that copies of this note and the respective responses are placed on the Neighbourhood Plan's and also the LPA's websites

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Independent Examiner to the Thorpe Neighbourhood Development Plan.

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