RUNNYMEDE BOROUGH COUNCIL

GREEN & BLUE INFRASTRUCTURE

SUPPLEMENTARY PLANNING DOCUMENT (SPD)

TOWN & COUNTRY PLANNING (LOCAL PLANNING)(ENGLAND) REGULATIONS 2012

REGULATION 12 STATEMENT OF CONSULTATION

November 2021

1.1 The Town & County Planning (Local Planning)(England) Regulations 2012 requires in Regulation 12 that before a planning authority adopt a Supplementary Planning Document (SPD), they must prepare a statement (Statement of Consultation) setting out:

i) The persons the local planning authority consulted when preparing the SPD;
ii) A summary of the main issues raised by those persons; and
iii) How those issues have been addressed in the SPD.

1.2 This document is the Statement of Consultation for the Green & Blue Infrastructure SPD and sets out the persons the Council engaged in preparing the SPD and how their comments have been addressed.

1.3 Early engagement on the content of the SPD was carried out by the Council during a stakeholder workshop on the 3rd March 2020. The stakeholders attending the workshop and the main issues raised are set out in Appendix A along with how these have been addressed in the draft SPD.

1.4 The Council also consulted with the Environment Agency, Historic England and Natural England on a draft Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) screening. The comments raised on the draft screening assessment and how they were addressed can be found in the SEA/HRA Screening Determination for the Green & Blue Infrastructure SPD whilst comments made on the content of the draft SPD can be found in Appendix B.

1.5 The draft SPD was open to public consultation for a period of 7 weeks between 9 August 2021 and 27 September 2021. A list of all those persons consulted on the draft Green & Blue Infrastructure SPD is set out in Appendix C. In total, 13 representations were received and a summary of these and how they were addressed in the SPD can be found in Appendix D.

Appendix A

Green & Blue Infrastructure Early Engagement Workshop 3 March 2020

CHRIS BLANDFORD ASSOCIATES
landscape | environment | heritage

cba

RUNNYMEDE GREEN & BLUE INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT

STAKEHOLDER CONSULTATION RECORD

Stakeholder Workshop
3rd March 2020
Civic Centre, Addlestone

Attendees

Runnymede Borough Council:
- Arboriculture
- Commercial Services
- Drainage
- Energy
- Green Spaces
- Planning Policy
- Development Management

Surrey County Council:
- Drainage
- Rights of Way

Neighbouring Local Authorities:
- Royal Borough of Windsor & Maidenhead

Blue Infrastructure Organisations:
- Environment Agency

Wildlife & Landscape Organisations:
- Surrey Bat Group
- Surrey Nature Partnership
- Surrey Wildlife Trust
- West Surrey Badger Group
- Woodland Trust

Access Organisations:
- Runnymede Access Liaison Group
- The British Horse Society
- Chobham Chasers

Amenity Groups:
- The Ottershaw Society
- Chertsey Society

Neighbourhood Forums:
- Englefield Green Village
- Thorpe
- Virginia Water

Setting the Scene Presentation

CBA outlined the proposed approach to the Green & Blue Infrastructure (GBI) Supplementary Planning Document (SPD) with regards to:

- Outline of the SPD
- Overview of Runnymede's GBI network
- GBI planning & design - what could good practice look like?

Roundtable discussions held on the following topic areas during the workshop, Climate Change, Biodiversity and Health & Well-being.

Climate Change

Issues Raised	How Dealt With
Planning for drought	Draft SPD contains examples of measures that can be implemented to conserve water resource i.e. grey water recycling and incorporating water sensitive natural flood management. Requirement for SuDS is already set out in 2030 Local Plan Policy EE13 as is safeguarding of floodplains in line with national planning policy, however SuDS implementation reinforced in design principles 3 & 4 of the draft SPD. Draft SPD promotes porous surfacing for hard landscaping in Section 3 and supports de-culverting of water courses and provision of wetland habitats. Run-off from development is covered by Policy EE13 and need not be reiterated in the SPD. Signpost to SCC SuDS Design Guidance included in design principle 4.
Natural flood management	
Implementation of SuDS	
Signposting existing flood schemes	
Awareness of/Mitigation of run-off from road schemes	
Avoid hard surfacing/non-permeable drives	
Support deculverting	
Safeguard floodplains & wetland habitats	
Avoid removing trees	Design principle 2 states that proposals should demonstrate how new and existing trees will be protected, structural landscape features & ancient woodland/trees retained, enhancing approaches to new and existing development through avenue planting/street trees, planting species to help adapt to climate change and enhance the public realm. Design principle 1 supports GBI which takes account of existing natural assets and the most suitable locations and types of new provision and principle 2 that proposals should use appropriate native species of local provenance and in the right place. In terms of targets for tree canopy per site, this would be an additional policy requirement on top of the 2030 Local Plan and therefore not appropriate, although design principle 2 generally supports increase in canopy cover across the Borough. Signpost to the Trees & Design Action Group's advice and SCC Tree Strategy.
Retain & gain in trees/increase canopy cover/possible tree canopy target for each site	
Avenue planting	
Right tree species/habitat in the right place	
Signpost SuNP position statement on tree planting	
Making the most of multifunctional GI benefits	
Reclaiming verges and reducing hard surfacing	
Species selection to adapt to climate change	
Charging points for electric vehicles	Draft SPD supports attractive travel corridors and connections between GI and other services and places, but aspects such as whether a corridor is segregated or provision of car sharing spaces, park & ride facilities is outside of the remit of the SPD.
Active Travel – segregated cycle/scooter/e-bike ways and connecting active travel networks	
Car sharing dedicated spaces	
Park & ride	

	Charging points for EVs are already required in 2030 Local Plan Policy SD7.
New build – renewables/solar roof tiles etc	2030 Local Plan Policy SD8 already sets out a requirement for renewable energy and guidance for its provision is largely outside the remit of a Green/Blue Infrastructure SPD, although reference is made in the draft SPD where these aspects can be combined. Draft SPD contains some guidance for materials in terms of hard landscaping, but this aspect is largely outside of the remit of the SPD as it deals with building performance. This is in any event covered in 2030 Local Plan Policies SD7 and SD8.
Building material selection	
Signpost to funding and utilise maintenance agreements	Design principles 1 & 6 of the draft SPD acknowledge and support funding & maintenance issues.
Challenge presented by PD	Acknowledged that PD can present challenges when seeking GBI improvements and connections.
Joined up-thinking	Draft SPD aims to join up the multifunctional aspects of GI in the 6 design principles presented.

Biodiversity

Issues Raised	How Dealt With
River Thames Scheme – BI opportunities	BI opportunities arising from the River Thames Scheme are recognised, however, the scheme will be considered by the National Infrastructure Commission not RBC. Section 3 and Design Principle 3 reference to how gardens can help connect biodiversity and principle 3 also references natural buffers to ecologically sensitive areas and that consideration given to network of priority habitats, species and Biodiversity Opportunity Areas (BOAs) and connectivity. Reference also made to the Runnymede Landscape Character Assessment in principle 2. Principle 5 includes reference to enhancing connectivity to residential areas and wider countryside and is also picked up in the GBI audit. Cumulative impact of small-scale schemes recognised in Section 3. Requirement to undertake GBI audit in Section 4 and references to ecological surveys referenced.
Garden connectivity – 'local community' approach	
Lower Thames Landscape Strategy – householders considering watercourses, buffer zones on water courses (min 10m)	
Wider connections at landscape scale	
Ecological surveys – adequate, appropriate and timely	
Natural Capital Investment Strategy – priorities for improvements	
Start at landscape scale. More & better connected habitats and enhanced quality	
Break down spatial silo approach to planning	
Cumulative impact of small-scale schemes	
Early eco surveys to inform design – 'landscape led approach'	
Landscape design choices – no token planting. Native planting selection, suitable habitats, appearance, British Standards	Principle 3 references tree planting and principle 2 native species of the right type in the right place and reference given to advice on plant health and biosecurity.
Tree pits	

Rain gardens	
Attenuating	
Guide on planting mix is important	
Only native species – not always the most resilient approach	
Biodiversity calculator – Survey of existing - what is best for that site	Reference to Biodiversity Metric 2.0 calculator set out in SPD. Request for 20% BNG is noted but this would go beyond current policy requirements. Inclusion of examples of biodiversity included Section 3 and principle 3 including bird/bat boxes and lighting schemes. SuDS as a wildlife resource and wetland habitat referenced.
BNG Toolkit	
Require 20% BNG – Go the extra mile	
Consider biodiversity as important as other principles such as HBS	
Building design for biodiversity – Bird & Bat boxes	
Lighting important (CCM and nature) to wildlife corridors	
SuDS are key/SuDS and biodiversity benefits	
All GI to perform for nature	
Enforcement, particularly private dwellings	The Council will use conditions to secure and enforce GBI measures and monitoring will be undertaken through the 2030 Local Plan monitoring indicators and Infrastructure Funding Statements not the SPD.
Review, monitoring and positive feedback (learning) – promoting best practice	
Monitoring – How to achieve this	
Clear communication of guidance	Noted. Section 3 strongly encourages GBI measures in householder development with Section 4 setting out requirements.
Choice of language/terminology re: approaches	
GBI planning principles – A=Ancient, B=Buffer, C=Connectivity	Noted.

Health & Wellbeing

Issues Raised	How Dealt With
Consider restricted mobility – drop kerb gradients, sensory gardens, passing places/widths, permeable surfaces	Design principle 5 sets out advice for best practice in creating accessible GBI for all.
Inclusive design and access for all	
Safe access – railings, being integrated into existing access	
Needs of all users e.g. horse riders	
River access – whole stretches of the rivers in RBC should be included in the GI Plan	SPD is a guide to developers rather than a strategy, however reference made in design principle 5 to connectivity with residential areas, wider countryside and to the Borough's cycling/walking networks. Whilst reference to improving crossings, existing cycling/walking paths, signage and access to water bodies is noted, this is largely outside the remit of the SPD which sets out guidance for new development, but GBI Strategies can take these into account if
Cycle linkages clear & navigable	
Low impact access and signage options	
To improve accessibility to water bodies for public access and signage/access for the disabled	
Opportunities to improve walking/cycling paths	
Enhancing crossings for pedestrians/cyclists/horses	

Horse riders – parking of these vehicles is important to enable people to access riding areas	improvements/enhancements required as part of development proposals. However, final design of crossings & cycle/walking paths will largely be agreed by SCC as the Highways Authority.
Natural England - ANGSt	Reference to Natural England ANGSt noted and SPD references good practice advice. River Thames Scheme noted, but this will be considered the National Infrastructure Commission not RBC. Avenue planting, trees for air quality, safeguarding areas for wildlife, educational value of GBI all included within draft SPD. Landscaping/greening of environment and environmental constraints i.e. flood areas would be considered on a case by case basis and expected to be addressed within site GBI Strategies or masterplans.
River Thames Scheme – Important to include this	
Noise pollution/tranquillity – bird song	
More avenue tree planting – backed up be research – traffic calming - 2/3% reduction in speeds, biodiversity corridors, key to site design, resilience of species	
Planting trees as solution to air quality	
Need to safeguard areas just for animals (wildlife)	
Alternative GI when areas become inaccessible e.g. during flood	
Companion Animals – address the additional pressures brought by animals (cats & dogs - build this future impact into design)	
Education – community orchards, access to outdoor 'wild' areas, roof gardens/forest gardens, vegetable plots	
Soft landscaping around social housing	
Medical facilities/hospitals – greening the grounds, nature, green prescribing	
Schools – how they can use other outside space	
Letting people know the green spaces are there – how best to do this – information	Information about new publicly accessible GBI features could be held on the RBC website. Safeguarding areas for wildlife i.e. low impact access included in draft SPD.
Promote new areas so people can use them	
Low impact access and signage options (e.g. wildlife site) examples	
Encouraging community involvement for GI maintenance and plans for community in planning applications (info for new residents)	Section 4 highlights that a GBI concept statement or similar should demonstrate a response to the GBI Audit, community expectations for GBI provision, client's brief and historic/current nature of the site. Community involvement/volunteering in maintaining GBI would largely be at the discretion of the developer or RBC depending on the management plan adopted.
Consultation to enable residents to say what they would like to be included	
Volunteering	
Ensuring GI maintenance & management	Management/maintenance plans for GBI will be expected with proposals and referenced in design principle 6.
Network mapping of off-site GI options, will access be highlighted or separate network map e.g. insufficient accessible GI in area, could developer add paths to existing (non-accessible) GI as an off-set?	Draft SPD contains maps highlighting GBI connections. Mapping of off-site GBI options would need to be undertaken in the GBI audit by developers required by the SPD.

Will there be a % GI required in development? If so, back gardens should not be included as not able to control use	No percentage required as 2030 Local Plan policies do not require this and would be beyond the remit of the SPD. However, 10% biodiversity net gain requirement set out in draft SPD.
Wycombe District – case study for canopy cover SPD (Woodland Trust)	Noted.
Greater Manchester Council – Case study for GI	Noted.

Appendix B

Green & Blue Infrastructure SPD – Early engagement with Statutory Bodies

Statutory Body	Response	Comment & Action
Environment Agency	No response	N/A
Historic England	No response	N/A
Natural England	**Green and Blue Infrastructure SPD** Advise that wording should be amended for clarity under box 1.12 - Thames Basin Heaths Special Protection Area SPD which currently implies that only SANG is required to provide mitigation for the SPA. SAMM would also need to be mentioned as it is currently unclear that this is also an equally necessary component of the mitigation strategy.	Agreed. Clarification made in updated SPD document
	Biodiversity Net Gain (BNG) Welcome objectives related to BNG which is a key tool to help nature's recovery and fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. For BNG, the Biodiversity Metric 2.0, can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on BNG. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain. The Chartered Institute of Ecology and Environmental Management, along with partners, has developed 'good practice principles' for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.	Noted. Reference to Biodiversity Metric 2.0 and CIEEM advice included in SPD
	Natural Capital Spatial planning at this scale is an ideal opportunity to assess the existing Natural Capital of the Borough (see para 171 of the NPPF), to plan to conserve those features providing key ecosystem services and address deficits. Natural England recently published the Natural Capital Atlas. As well as providing a baseline against which to measure change, the Natural Capital Atlas can be	Noted.

	used to understand which ecosystem services flow from different ecosystem assets across England. The atlas shows where there are both strengths and weaknesses in the quantity and quality of ecosystems. This can inform opportunity mapping of where to enhance existing natural capital and where to target its creation for the provision of multiple benefits.	
	Climate Change Welcome the consideration of climate change and highlight the role of the natural environment to deliver measures to reduce the effects of climate change In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation and resilience. Natural England, in partnership with the RSPB, recently published a 2nd edition of the Climate Change Adaptation Manual which includes a Landscape Scale Climate Change Assessment Tool. This tool can be used to identify natural assets (e.g. different habitats and species) in the borough and identify adaptation responses that can be incorporated into a Plan to create a resilient landscape across the Borough. Also, consideration could be given to whether the plan recognises the role of eco-systems. Also refer to the attached Annex which covers the issues and opportunities that should be considered and may be helpful.	Noted.

Appendix C

List of Persons Consulted on the draft Green & Blue Infrastructure SPD

As well as the persons listed below a further 273 individuals on the Planning Policy consultation database were consulted.

398 Air Cadets	Carter Jonas
ACS Egham	Carter Planning Ltd
ACS School Egham	CBRE Ltd
Adams Group Real Estate Ltd (on behalf of Tarmac)	Chertsey Good Neighbours
Addlestone Baptist Church	C-Far
Addlestone Community Centre	Chertsey Chamber of Commerce
Addlestone Historical Society	Chertsey Museum
Addlestone Salvation Army	Chobham Commons Preservation Committee
Affinity Water	Chobham Parish Council, Chobham Parish Pavilion
All Saints New Haw	Christian Science Society Egham
Allied Telesis	Civil Aviation Authority
Anderhay	CMA Planning
AR Planning	Community Life
Armstrong Rigg Planning	CPRE Surrey
ASC Finance for Business	Darley Dene
Ashford & St. Peter's Hospital NHS Foundation Trust	Devine Homes
Ashill Group	DevPlan
Aston Mead Land & Planning	DfE
Avison Young obo National Grid	DHA Planning
Barton Willmore LLP	Dhammakaya International Society Of The United Kingdom
Basingstoke Canal Society	Disability Empowerment Network Surrey
Beacon Church	DP9 Ltd
Bell-Cornwell	DPDS Consulting
Berkeley group	East Berks CCG
Bigbury Neighbourhood Plan Steering Group	Egham Chamber of Commerce
Bishopsgate Primary School	Egham Residents Association
Bisley Parish Council	Egham Women's Institute
BLARA, BENRA, RRA & RAR	Elmbridge Borough Council
Blue Cedar Homes	Englefield Green Neighbourhood Forum
Bracknell Forest Council	Englefield Green Village Centre
Brooklands College	Englefield Green Village Residents Association
Buckinghamshire Council	Enterprise M3 LEP
Calatec Ltd	Environment Agency

Epsom and Ewell Borough Council	Lyne Residents' Association
Forest Estate Community Hub	Lyne School
Franklands Drive Residents Association	Lyne Village Hall
Free Schools Capital Education and Skills Funding Agency, Department for Education	Manorcroft Primary School
Friends families and travellers	Mayor of London
Gladman Developments Ltd	Meadowcroft Community Infant School
Glanville Consultants	Meath School
Grosvenor Capital	Mole Valley District Council
Guildford Borough Council	Montagu Evans LLP
Halogen UK	Natural England
Hamm Court Residents Association	Network Rail
Hants County Council	New Haw Community Centre
Hart District Council	New Haw Community Junior School
Heatons	New Haw Residents Association
Highways England	NK Homes
Hodders	North Surrey CAMRA
Homes England	North West Surrey Valuing People Group
Hythe Community Church	Office of Road and Rail
Hythe Community Church Pentecostal	Ongar Place Primary School
Hythe Community Primary School	Optimis Consulting
Imperial College	Ottershaw & West Addlestone Independent Residents Alliance
International Community Church	Ottershaw C of E Junior School
IQ Planning Consultants	Ottershaw Society
JAS Architects	Ottershaw Village Hall
Jaspar group	Ottershaw Women's Institute
John Andrews Associates	Ottershaw Neighbourhood Forum
JP Electrical	Paul Dickinson and Associates
JR Marine	Pegasus Group
Just a helping hand	Pegasus Planning
Kennedy Memorial Trust	Penton Park residents Association
Kevin Scott Consultancy	Philip Southcote School
Kinwell Property Investments Ltd	Plainview Planning Ltd
Laleham Reach Residents Association	Planning Potential Limited
Lichfields	Porta Planning LLP (representing Centrica plc (British Gas))
London Borough of Hillingdon	Pyrcroft Grange School
London Borough of Hounslow	Quod
London Borough of Kingston Upon Thames	R Clarke Planning Ltd
London Borough of Richmond Upon Thames	Rainbow Day Nursery & Pre-School
London Plan Team	Reflected Reality
Longcross North Residents Association	Reigate and Banstead Borough Council
LRG	Reside Developments
Lyne Hill Nursery	Revera Limited

Richborough Estates	Stonehill Crescent Residents Association Limited Company
Rickett Architects	Stride Treglown Ltd
Royal Borough of Windsor and Maidenhead	Stroude Residents Association
Royal Holloway University	Strutt & Parker
RSPB England	Surrey Chamber of Commerce
RSPB North West Surrey Local Group	Surrey Coalition of Disabled People
Runnymede & Weybridge Enterprise Forum	Surrey Community Action
Runnymede Art Society	Surrey County Council
Runnymede Christian Fellowship	Surrey Heartlands CCG
Runnymede Council Residents' Association	Surrey Heath Borough Council
Runnymede Deanery	Surrey Minority Ethnic Forum
Runnymede Dementia Action Alliance	Surrey Muslim Centre
Runnymede Foodbank	Surrey Positive Behaviour Support Network
Runnymede Muslim Society	Surrey Scouts
Rushmoor Borough Council	Surrey Wildlife Trust
Sanders Laing	Surrey Women's Institute
Savills	Tandridge District Council
Savills UK Ltd on behalf of Thames Water Utilities Ltd	TASIS The American School in England
Sayes Court School	Teach First
SETPLAN	Terence O'Rourke Ltd.
Shanly Homes	Tetlow King Planning
Sheerwater Avenue Residents Association	The Coal Authority
Slough Borough Council	The Egham Museum
South East Coast Ambulance Service NHS Foundation Trust	The Emerson Group
Special Interest Groups Surrey	The Gardens Trust
Spelthorne Borough Council	The Georgian Group
Sports England	The Holy Family Catholic Primary School
SSA Planning	The Kings Church
St Anne's Catholic Primary School	The Marine Management Organisation
St Ann's Heath Junior School	The National Trust
St Cuthbert's Catholic Primary School	The Planning Bureau Ltd
St Johns Beaumont	The Ramblers
St John's Church Egham	The Runnymede on Thames
St Judes C of E Junior School	The Twentieth Century Society
St Modwen	The Victorian Society
St Paul's C of E Primary School	Theatres Trust
St Paul's Church Egham Hythe	Thorpe Lea Primary School
St. Paul's Church	Thorpe Neighbourhood Forum
Staines and District Synagogue	Thorpe Park (Merlin Entertainments Plc)
Stellican Ltd	Thorpe Village Hall
Stepgates Community School	Thorpe Ward Residents Association

Transport for London	
Turley	
Turn2us	
TWRA	
UK Power Networks	
Union4 Planning	
United Church of Egham	
Urban Green Developments	
Vail Williams LLP	
Vanbrugh Land	
Virginia Water Community Association	
Virginia Water Neighbourhood Forum	
Voluntary Support North Surrey	
Waverley Borough Council	
Wentworth Residents Association	
Wentworth Residents Association	
West Addlestone Residents Association	
West End Parish Council	
Windlesham Parish Council	
Woburn Hill Action Group	
Woking Borough Council	
Woking Borough Council	
Wokingham Borough Council	
Woodham Park Way Association	
Woodland Trust	
Woolf Bond Planning	
Wraysbury Parish Council	
WSP Indigo	
WSPA	
WYG	
Youngs RPS	

Appendix D

Summary of Representations to the draft Green & Blue Infrastructure SPD and the Council's Response

Representor	Summary of Representation	Council's Response	Amend SPD?
Avison Young obo Newlands Development Ltd	Section 2.2 of the draft SPD outlines the approach which the Council has taken to the preparation of the document. It follows a standard and reasonable approach of involving key stakeholders. However, there is no reference to the involvement of landowners in the preparation / workshop process. Whilst some areas of land across Runnymede may be clearly identifiable as green or blue infrastructure, there will be sites, such as the Thorpe Lea Road site, where the involvement of the landowner would have been very important (particularly given its individual characteristics). The Thorpe Lea Road site has historically been controlled by Tarmac and, to the best of their knowledge, no contact has been made in relation to this particular site. It is a site which has previously been used for mineral extraction and contains an element of previously developed land. Therefore, we do not consider that the draft SPD has been prepared in a robust manner, as it has not included contact with key landowners which we believe is an important prerequisite before designating their land as new green and blue infrastructure within the document. Had proper contact been made, the Thorpe Lea Road site would not have	Noted, preliminary stakeholder involvement was undertaken and whilst this did not include landowners (other than public bodies) this did include key stakeholders. Further, during preparation of the Runnymede 2030 Local Plan the Council engaged with a number of landowners, in particular for sites which have been allocated for development. It was not considered reasonable to approach allocation site landowners again in preparation of the SPD where green infrastructure requirements have already been set out in adopted allocation policies and neither was it considered reasonable to engage with landowners of unallocated sites. As part of the evidence to support the 2030 Local Plan, the Council prepared an Open Spaces Study published in 2017. The study identified Thorpe Lea Road (site 229 in Appendix 8) as open space on Map 48 on p58 of the study, with protection against the loss of open space set out in adopted 2030 Local Plan policy SL25. As such, it is the 2030 Local Plan and Open Spaces Study, which were subject to public consultation including with landowners, which classifies and protects the Borough's open spaces not the SPD. In any event, the GBI SPD itself	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	attracted certain designations. This is explained further below.	simply sets out guidance on how developers can achieve GBI within their developments, it does not classify any new green/blue infrastructure to those already set out within the Open Spaces Study.	
	The classification of the Thorpe Lea Road site <u>Green Infrastructure</u>		
	The draft SPD classifies the Thorpe Lea Road site as green infrastructure (see map 1.2) but not as accessible green infrastructure (see map 1.3). The PPG definition of green infrastructure is quoted as follows: *"Green infrastructure can embrace a range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies. (Paragraph 004)"*	Noted, however it is not the SPD that classifies the site as green infrastructure but the Open Spaces Study and 2030 Local Plan.	No
	We note that the Thorpe Lea Road site does not currently contain any physical development (although it has previously been used for mineral extraction, and then	The site's characteristics are noted along with its promotion through the Local Plan. However, it is not for the SPD to de-classify	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	restored) and it does currently lie within the Green Belt. Whilst the eastern part of the site does contain some open space and woodland, it should be noted that: (A) its usability and access is very poor; and (B) the historic uses of the site preclude it as place that could be good quality accessible green infrastructure; and (C) a large element of the site is being promoted for much-needed employment development through the new Local Plan as a logical northwards extension to the existing Thorpe Lea Industrial Estate. As part of this promotion, work has been undertaken to assess the site against the Green Belt purposes listed in NPPF Para. 138 (see attached). The assessment concluded that the Thorpe Lea Road site offers no useful contribution to the strategic function of the Green Belt and that: (a) it should be removed from the Green Belt; (b) it has the capacity to support employment development; and (c) development of part of the site can provide compensatory enhancements on the remainder of the Site that will lead to a positive contribution to the provision of green infrastructure. It would therefore be inappropriate for the SPD to impose an unreasonable constraint upon the site which has not been tested through the plan-making process and which has not been properly justified. <u>Public Park and Garden</u>	or change the typology of an open or consider it's promotion for allocation. Representor's Green Belt review of the site is noted, however, this is a matter for the Local Plan review not the SPD. As set out above the SPD does not classify any new open space/green infrastructure sites, but simply reiterates those identified through the Open Spaces Study which was tested through 2030 Local Plan preparation.	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	Annex C (including Map A.7) also designates the Thorpe Lea Road site as a 'public park and garden'; the definition of which is given in the annex as follows: *"Public parks and gardens are urban green spaces predominantly associated with informal and formal recreation (including playing fields and play spaces). There are a number of public parks, playing fields and play spaces widely distributed throughout Runnymede's towns. Key parks within Runnymede include Chertsey recreation ground; Heathervale recreation ground in Addlestone; Ottershaw Memorial Fields; and The Orchard and Abbeyfields in Chertsey".* The majority of the Thorpe Lea Road site clearly does not meet any part of the definition offered by the Council above. The site is not accessible to the public and is, in any event, not a usable space due to its overgrown nature. The remainder of the site is not promoted/advertised as a public park and/or public garden so this designation is clearly misleading, misrepresentative and seeks to impose a policy constraint which has not been tested through the plan-making process. Therefore, there is no reasonable justification for this designation to remain in the final version of the SPD and we request that is it removed from the document.	The classification of Public Park & Garden is taken from the Open Spaces Study prepared as evidence to support the 2030 Local Plan and tested at EiP prior to its adoption. As such, the SPD simply reiterates the classification given by the Open Spaces Study, it does not impose any new classification on the site. As such, any request to review of the site's classification would need to be made through the Local Plan review process.	No.
	It is clear that the scope and approach of the SPD document needs to be reframed to allow	See comments below.	N/A

Representor	Summary of Representation	Council's Response	Amend SPD?
	development proposals to demonstrate their ability to make a positive contribution to the provision (and maintenance) of green and blue infrastructure across Runnymede. There are two particular points to note here. Firstly, the draft SPD provides some helpful guidance for major development proposals in Section 4. This advocates a common-sense, step-by-step approach to assessing assets, considering potential opportunities and then incorporating green and blue infrastructure into development proposals. However, this sits uncomfortably with the presentation of green infrastructure designations in the draft SPD document, which gives the impression that an audit of green infrastructure assets has already been undertaken and does not allow for suitable development proposals in these areas. Whilst it is not unusual for planning policy documents to outline green and blue infrastructure, this is usually supported by a robust justification for each designated area. However, in this instance, the Council has not published any justification for the proposed designation of green and blue infrastructure assets and therefore it would appear that 'step 1' in section 4.2 of the draft SPD should actually have been undertaken for the purposes of preparing a robust SPD. Therefore, the content of the SPD needs to be restructured to include a justification for each designation.	Comments regarding the approach of the SPD are noted. As stated above the classification of open spaces in the SPD is taken from the Open Spaces Study, prepared for the 2030 Local Plan and tested at EiP. The SPD contains guidance on undertaking an audit of green infrastructure with development proposals where existing assets and opportunities should be appraised but has not itself undertaken an audit, but has taken the classifications from the Open Spaces Study.	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	Secondly, Section 4 must also acknowledge that there are, in appropriate circumstances, opportunities for qualitative enhancements of green and blue infrastructure via development proposals even if the overall area of GBI is reduced. This is certainly the case in relation to the Thorpe Lea Road site where the value of GBI at the eastern end of the site (and beyond) can be enhanced as part of development proposals on the western part of the site. This concept needs to be acknowledged in the SPD, with: (a) a 'route map' for achieving these benefits; and (b) links to biodiversity net gains.	Section 4 of the SPD sets out that an audit of GBI assets should be undertaken. The audit should be used as an opportunity to appraise GBI assets (whether on or off site) and feed into the identification of opportunities and constraints. Whilst not mentioned, the SPD does not specifically preclude the reduction of GBI on a site. However, any proposal where loss would occur would need to be considered against Policy SL25 of the 2030 Local Plan which allows the loss of open space in certain circumstances. As such, any loss would need to justified, taking account of Policy SL25 in the GBI audit and appraisal. This could be more clearly set out in the SPD.	Yes. SPD to be made clearer that where loss occurs this will need to be clearly justified against Policy SL25 of the 2030 Local Plan in the GBI Audit.
	We consider that in order to provide a robust and sound SPD the above amendments and additions should be made prior to any adoption by the Council. Without these amendments/additions the SPD will be misleading in respect of GBI. It is important that the development plan evidence base is robust and that important development proposals are not stifled unnecessarily by unsubstantiated designations.	See comments above.	N/A
Carter Jonas obo Tarmac	Whilst TARMAC support the principles set out in the GBISPD in acknowledgement to both the benefits this has for healthy living and the environment, there are comments we want to make in relation to Longside Lake	Noted and support welcomed.	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	to the west of the M25 in Egham (the 'Site') which they own. As confirmed by Map 1.3, the Site is shown/designated as both 'Accessible Green Infrastructure' and 'Blue Infrastructure'. Whilst such infrastructure is supported as referred to above, this designation should not preclude an allocation in future iterations of a Local Plan or indeed development of the Site. This is particularly relevant when considering such infrastructure can be integral to a development and assist in delivering a range of environmental, economic, social, health and wellbeing benefits to both the local and wider community. It is also relevant that whilst a site may be designated as GBI, development may represent an opportunity to enhance, protect and maintain such areas and as a consequence, provide stronger links to the surrounding networks. In summary, TARMAC support the principles of the GBISPD but want to highlight that Green and Blue Infrastructure designations should not limit opportunities for development.	 Noted, the classification of a site and whether it would be taken forward or not for allocation is a matter for the Local Plan review not the SPD. The SPD itself is a guidance document setting out how developers can achieve GBI within their developments. Noted. Section 4 of the SPD sets out the requirement to undertake a GBI audit and identify opportunities within development. Any loss of GBI would need to be justified against Policy SL25 of the 2030 Local Plan within the GBI audit. Noted.	 No. No. N/A
Chobham Parish Council	The Council supports the principles of the supplementary planning document and the role that the natural environment plays in many capacities, including resilience to	Noted.	N/A

Representor	Summary of Representation	Council's Response	Amend SPD?
	climate change, the health of communities and the wildlife population. The Council has reviewed the document with interest and feels it contains very useful and comprehensive information, guidance and checklists. The Council has the following comments to make on the overall aims of the document: 1. As well as Green and Blue infrastructure assets within Runnymede Borough, it is felt that it would be appropriate to ensure the same guidance is applied when considering development and enhancement opportunities in the vicinity of Green and Blue assets situated on the borough's border. For Chobham this would include Chobham Common, Stanners Hill and the open green space to the east of Fairoaks Airport. 2. It is felt that co-operation is vital with neighbouring authorities to ensure policy does not have the effect of enhancing biodiversity in one area at the expense of that in neighbouring administrative areas, and that ecological corridors and sustainable walking and cycling routes	Noted. Noted. The SPD will be applicable to all development within Runnymede irrespective of location. It could however include reference to ensuring that major development close to or adjacent to the Borough's boundaries takes account of GBI assets in neighbouring areas through the GBI audit. However, it cannot seek enhancement to GBI outside of Runnymede. In relation to Chobham Common, as this is part of the National Site Network any impacts (and mitigation) would be considered through a Habitats Regulations Assessment (HRA). Noted. See comments above. The GBI audit undertaken by developers should cover the aspects noted in the representation as set out in Sections 4.2-4.4 of the SPD. SPD could be made clearer that provision/enhancement of GBI in Runnymede should not lead to a deterioration of GBI in neighbouring areas.	N/A Yes. Add that GBI audits should take account of GBI assets in neighbouring areas where major development is close to the Borough boundary. Yes, SPD to clarify that provision/enhancement of GBI in Runnymede should not lead to a deterioration of GBI in neighbouring areas.

Representor	Summary of Representation	Council's Response	Amend SPD?
	can be joined up.		
	3. Green and Blue infrastructure policy should fully accord with policies already in place to avoid adverse effects on the Thames Basin Heaths Special Protection Area.	Noted. Runnymede has a Thames Basin Heaths SPA SPD which was adopted in April 2021 and which sets out the requirements for avoidance and mitigation. It is not proposed to repeat these in the GBI SPD as the two documents are complementary however reference is made to the TBH SPD in paragraph 2.1.9.	No.
	4. The Parish Council is concerned that any major development that creates a net loss of greenfield or wooded land would effectively wipe out smaller gains made elsewhere. It is felt that more emphasis could be placed on ensuring major development is directed away from sites already rich in Green and Blue assets.	Noted. The direction of development has already been set out with the 2030 Local Plan Spatial Strategy and allocation sites and it is not for the SPD to revisit this. In addition, Policy SL25 of the 2030 Local Plan already affords general protection of the Borough's existing open spaces and Policy EE11 the delivery of high quality green infrastructure.	No.
	If the Council can provide any further information on any of the above points, please do not hesitate to contact CPC.	Noted.	N/A
Coal Authority	The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.	Noted.	N/A
	As you are aware, Runnymede Borough Council lies outside the defined coalfield and	Noted.	N/A

Representor	Summary of Representation	Council's Response	Amend SPD?
	therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc. In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.	Noted.	N/A
Egham Residents' Association	The Egham Residents' Association warmly welcomes the broad thrust of this document. The background to it is one of ceaseless development pressure on our town and borough and one of rapidly increasing awareness that there will be potentially catastrophic consequences for mankind and our planet if the climate change emergency is not fully recognised and tackled. So the proposals in this document to lock care for the borough's blue and green infrastructure (GBI), and climate change resilience, into the local planning system are very much a step in the right direction. How could they not be welcomed? The proposal to attach green and blue infrastructure obligations to all local planning applications, for both major and minor schemes, is not only desirable but essential.	Noted and welcomed. Noted. Support noted and welcomed.	N/A N/A N/A

Representor	Summary of Representation	Council's Response	Amend SPD?
	We applaud it. Likewise the numerous references to reinforcing local character and sense of place, supporting nature and biodiversity and contributing to healthy living and wellbeing.		
	However, the talk in the document of creating GBI networks and green corridors does not lack irony. Our awareness that the proportion of Green Belt land in Runnymede Borough has been cut from 79pc to 74pc in just six years prompts the thought that if things carry on like this our green infrastructure will be reduced before much longer to a network of thin and precarious threads of green in an urban or suburban sprawl.	Noted, however the areas of land released from the Green Belt for development in the 2030 Local Plan were subject to rigorous testing of their Green Belt and sustainability credentials. Further, a number of sites released are previously developed or partially previously developed with little or no green infrastructure on site but which will now be provided for in the 2030 Local Plan allocations.	N/A
	The one reference in the document to the Green Belt (paragraph 2.1.6) is surely inadequate, and in view of recent experience the conclusion of this paragraph is wide open to dispute. It occurs to us that GBI might also stand for Green Belt Irrelevant.	Paragraph 2.1.6 of the SPD references the vision set out in the 2030 Local Plan and it is not the role of the GBI SPD to amend or add to this or introduce new policies for the protection of the Green Belt.	No.
	To repeat, we very much welcome this new SPD, but the proposals in it do smack of bolting down the tables in the dining room while the ship is still steaming at great speed towards the iceberg (or, more appropriately in the circumstances, the spaceship is still flying towards the sun).	Noted.	N/A
	We also think the document should include greater reference to the River Thames	The River Thames Scheme (RTS) is included as an opportunity for the	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	Scheme – and the potential consequences for Egham of a section of it not being constructed - and to local playing fields.	creation/enhancement of green/blue infrastructure in Annex D of the SPD. Whether the RTS proceeds or not will be for the National Infrastructure Commission and Environment Agency. In any event the role of the SPD is to set out guidance for developers to follow in providing green/blue infrastructure in their development sites, rather than an audit or strategy for local assets such as local playing fields.	
	Further to this last point, why is the Manorcrofts Playing Field shown in purple in Map A7 as an "amenity greenspace" rather than in green under the heading of "public parks and gardens (including playing fields and play spaces)"?	The classification of the Manorcrofts Playing Field has been taken from the Open Spaces Study 2017 which supported the 2030 Local Plan and is protected under Policy SL25. A review and update of the Borough's open space classifications may be undertaken as part of the Local Plan review.	No.
Environment Agency	We welcome the contents of this SPD as it is very well written and comprehensive; you have included a lot of good information and advice in this SPD. We thought the diagrams with annotations of the GBI options were really useful. We have some comments on various sections of the SPD, set out below.	Noted and welcomed.	N/A
	Section 1.1.1 - only mentions lakes as an example of a blue asset. As this is one of the first things readers will see, ideally this would be changed to rivers or watercourses.	Noted. Rivers or watercourses to be added to para 1.1.1.	Yes. Add river/watercourses to para 1.1.1.
	Section 1.2 – We cannot see that you've mentioned the SPA and Ramsar site (called	Noted. South West London Waterbodies SPA/Ramsar to be added to para 1.2.4.	Yes. Add South West

Representor	Summary of Representation	Council's Response	Amend SPD?
	South West London Waterbodies) that is in your local authority area (located between Thorpe and Chertsey). This is an important blue infrastructure asset.		London Waterbodies to para 1.2.4.
	Map 1.1 - The settlements are named but the watercourses aren't and it's not very clear where the rivers are. We recommend annotating a few of the bigger rivers (River Thames, Addlestone Bourne, Chertsey Bourne, River Wey). More description could be made given the significant river corridors in Runnymede, also include details on habitat type/ WFD status.	Noted. Annotations of rivers and major waterbodies are shown on Map A9 in Appendix D and agreed that these can be added to Map 1.1. Reference to Thames River Basin District Management Plan and link to WFD status added to Annex D.	Yes. Add annotations to Map 1.1 and links to Annex D.
	Section 2.1.13 - this seems a bit vague. We assume 'good practice' is to follow the mitigation hierarchy and 'seek specialist advice' means that an ecologist (or appropriate specialist) should be employed to assess the risks. We believe this point should be more clear and examples given to explain what they mean.	Good practice and links to specialists are signposted later in the document but SPD could cross reference to these.	Yes. Cross reference to Sections 3 and 4 added.
	Section 3.1.2 - remove 'wherever possible' - developments shouldn't accrue a net loss in any circumstances, even if they can't achieve a net gain.	Noted, however this section refers to householder development where it may not always be possible or reasonable to expect to avoid a loss of GBI to accommodate householder development i.e. using garden space to build an extension etc.	No.
	Section 3.4.2 - It should be made clear that berberis and pyracantha are non-native, even though they do have a benefit for wildlife. We	Noted. Reference to berberis and pyracantha being non-native can be added	Yes. Add that berberis & pyracantha are non-native and reference to

Representor	Summary of Representation	Council's Response	Amend SPD?
	are happy for these to be included as examples but think it should be made clear that they are not native. There should also be a sentence about making sure any trees that are planted are from sources that are certified as pest and disease free, as mentioned on p32.	as well as reference to trees being certified as pest & disease free.	certified pest & disease free trees.
	Section 3.5.1 - add that if planting native wildflower mixes instead of an amenity lawn, then a reduced mowing regime should be implemented to allow the wildflowers to grow and set seed. There will be no point in planting native wildflower mixes if it's going to be treated like an amenity lawn and mowed every couple of weeks.	This can be added as information for applicants, however, as this relates to householder development it would be unreasonable to request as a mandatory requirement.	Yes, but for information only.
	Section 3.8.1 - The council should also require a short paragraph explaining how enhancements will be maintained in the future, ie: bird boxes will need to be cleaned out each year to prevent a build up of parasites.	As above, this can be added as information for applicants, however, as this relates to householder development it would be unreasonable to request as a mandatory requirement such as a maintenance agreement or planning condition.	Yes, but for information only.
	Section 4.3.7 - Unsure what they mean when they say that they will be expected to deliver Green and Blue Infrastructure (GBI) net gain on site unless it can be demonstrated with evidence that this is neither feasible or viable. GBI is really closely linked to Biodiversity Net Gain (BNG). BNG will become mandatory soon so all developments will need to secure BNG and if they can't, they will have to deliver it offsite. This phrasing suggests to	Section 4.3.7 relates to the delivery of GBI and its relationship with CIL. The paragraph references that although the Council charges development CIL (which could be spent on a range of infrastructure including GBI), that the Council still expects GBI to be provided on-site i.e. on top of CIL. This is caveated, to explain that this is unless it can be demonstrated with evidence that on-site delivery is neither feasible or viable to allow	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	me that if the applicants can demonstrate that it's not viable or feasible to do anything on site, then they don't have to do anything at all which is not the case. It should be made clear that in that instance, developers will have to contribute to offsite enhancements.	for greater flexibility where site circumstances may dictate that GBI is undeliverable on-site. In these instances the Council can use CIL to facilitate off-site opportunities/enhancements as is indicated in para 4.3.7.	
	Diagram 4.2 - please can a river be added to the diagram so that a buffer zone can be shown. Number 12 on the diagram doesn't seem to be in the correct place - it's hovering over a hedge when it should be a wildflower lawn. Ideally the diagram and annotations should also all be on one page - it's hard to flick back and forth to see the diagram and then the annotations.	Noted. River added to annotation and buffer zone highlighted in the key. Annotation 12 to be moved. However, it is not possible to fit the diagram and key on one page and so will remain on two pages.	Annotation 12 moved, and river added. Not possible to fit diagram and key on one page due to space.
	Section 4.5.13 - Box 4.7 is blank.	Text added to Box 4.7	Yes, amend Box 4.7.
	Section 4.5 16 - they talk about demonstrating how green and blue corridors in and adjacent to the site have been retained, enhanced and linked. They should link this to their buffer zone policy, and advise that developments should be set back from watercourses, ideally providing a variable width along the development (with the minimum width being the 8m for main rivers and 5m for ordinary watercourses as set out in their planning policy). Also the last two bullet points on Page 35 reference buffer zones and watercourses, all developments not just major developments should	Noted, reference to Policy EE12 requirement for 5m and 8m buffer zones can be an added under 'Minor & Major Developments' in 4.5.16. Point regarding the last two bullet points is noted and third bullet under 'Major Developments' can be moved under Minor & Major developments' and possibly combined with the bullet point regarding 5m & 8m buffers.	Yes. Add reference to buffer zones and move third bullet under 'Major Development' to encompass minor & majors.

Representor	Summary of Representation	Council's Response	Amend SPD?
	demonstrate how GBI assets have been retained and enhanced, and buffer zones for watercourses should be included as part of this.		
	Section 4.5.18 - Change to Biodiversity Metric 3.0 as this is now available for use	Noted. Biodiversity Metric to be changed to 3.0.	Yes. Updated to refer to the governments most up to date biodiversity metric.
	Page 37 – Last bullet point under All Minor and Major Development. Include detail on naturalisation of river banks, inclusion of undeveloped buffer zones.	Text to be added to last bullet to read '*Have existing habitats and landscape features such as hedgerows, trees, water bodies and corridors such as rivers, canals, undeveloped buffer zones been integrated into the scheme as well as opportunities for naturalisation of river banks?*	Yes. Add text to last bullet for Minor & Major developments regarding buffers and naturalisation of river banks.
	Section 4.5.21 – Page 43 Major development bullet point. Natural buffer zones along main rivers and water courses are expected of all developments, not just major so this needs moving into that section. Also include comment on natural native planting, widening and re-naturalisation of existing buffer zones in brownfield areas.	Noted and bullet to be moved to encompass minor & major developments. Natural native planting can be added to first bullet and widening & re-naturalisation of existing buffers can be added to final bullet under minors & majors.	Yes. Add text for native planting and widening of existing buffers under bullets one and four of minor & major developments.
	Page 44 – include a bullet point about blue infrastructure – have watercourses/ buffer zones been included to protect and enhance Blue Infrastructure on site? These act as important biodiversity corridors but also provide natural flood risk reduction methods,	Noted and bullet to be added as suggested.	Yes. Add bullet under 'all development' to include watercourse/buffer zones.

Representor	Summary of Representation	Council's Response	Amend SPD?
	and are useful in mitigating and adapting to climate change. **General comments** It is a very long document, not sure individual homeowners and developers are going to read all this. If this can be streamlined, we think it would be worthwhile. Also, most of the case studies have no before and after pictures of the site. Visual aids are really useful to showcase what can be achieved. We note that case study 4.11 (Water Colour Homes in Redhill) de-culverted a river as part of the development. Before and after pictures of this would be great to have in the document so the readers can see how beneficial de-culverting is. **Final Comments** Once again, thank you for contacting us with this Green and Blue Infrastructure SPD. Our comments are based on our available records and the information as submitted to us.	Noted. The SPD is split into different sections for householders and major/minor developments so applicants need only read the sections that relate to their development. Noted	No. No copyright-free imagery of the de-culverted river available. N/A
Marine Management Organisation	The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response. <u>Marine Management Organisation Functions</u>	Noted. No further response received and as such this representation is taken as the response from the MMO.	N/A

Representor	Summary of Representation	Council's Response	Amend SPD?
	The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants. <u>Marine Planning and Local Plan development</u> Under delegation from the Secretary of State for DEFRA the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, Defra created the Coastal Concordat. This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform	Noted. Noted. It would appear from the map in Figure 1 of the South East Inshore Marine Management Plan that the stretch of the River Thames in Runnymede is not covered by the South East Inshore Marine Management Plan or any other Marine Management Plan.	N/A N/A

Representor	Summary of Representation	Council's Response	Amend SPD?
	and guide decision-makers on development in marine and coastal areas. Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management. <u>Marine Licensing and consultation requests below MHWS</u> Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a marine licence in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning	Noted. See comments above.	N/A

Representor	Summary of Representation	Council's Response	Amend SPD?
	permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. <u>Consultation requests for development above MHWS</u> If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points: • The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the Planning and Compulsory Purchase Act 2004. Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response. • It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act. • If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.	Noted. See comments above.	N/A

Representor	Summary of Representation	Council's Response	Amend SPD?
Natural England	While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues: **Green Infrastructure** This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.	Noted. The SPD sets out detailed guidance on how development at all scales can deliver GBI.	N/A No.
	The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on Green Infrastructure provides more detail on this.	Noted. Reference to the NPPF and PPG is set out within the SPD.	No.
	Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to	Noted. This is set out within the SPD.	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	nature can also improve public health and quality of life and reduce environmental inequalities. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through: • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is included within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity". **Biodiversity enhancement** This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on,	 Included in the SPD Included in the SPD Covered in the SPD as the requirement for details of maintenance/management of GBI. Issue of protection for natural resources included in terms of water through rainwater harvesting/greywater recycling, air quality through planting and soils through retention/enhancement of GBI assets. Noted. A link to good practice guidance for Green Infrastructure & Biodiversity can be added to Principle 1. SPD includes guidance throughout for biodiversity enhancements, including links to ecological advice for householders (Box 3.1) and for minor and major developments (Box 4.1 and elsewhere in Section 4)	 No. No. No. No. Yes. Add link to Principle 1 No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit. **Landscape enhancement** The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.	This is included within the SPD.	No.
	For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new	Noted. Signpost to guidance included within the SPD on lighting proposals and bats and Principle 2 deals with reinforcing local character and sense of place but additional text can be added with respect to trees of appropriate species. The point regarding	Yes. Add new bullet point to Principle 2

Representor	Summary of Representation	Council's Response	Amend SPD?
	trees will be well established by the time mature trees die.	succession planting is already covered by the 3rd bullet in Principle 2.	
	Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).	Noted. Signpost to guidance included within the SPD on lighting proposals and bats and Principle 2 deals with reinforcing local character and sense of place.	No.
	Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.	An SEA/HRA screening assessment has been undertaken and published alongside the SPD. A draft version of the screening was subject to consultation with the three statutory bodies including Natural England and comments incorporated into the final assessment.	No.
	Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.	Noted.	N/A
Spelthorne Borough Council	The style and layout of the document is very good and is easy to read and understand.	Noted and comments welcomed.	N/A
	The guide itself is clear and helpful and should provide a sound basis for applicants	Noted. Hyperlinks to the Runnymede 2030 Local Plan can be added but policies are	Yes. Add hyperlink to 2030 Local Plan.

Representor	Summary of Representation	Council's Response	Amend SPD?
	of varying scales of development to be aware of Runnymede's requirements. Is there a way of linking to the relevant policies in the LP when these are referenced in the text, through a hyperlink or similar to aid the reader and ensure these are read concurrently? Para 1.3.5 half of the text is different in size/font to the remainder.	not set out separately so it would not be possible to hyperlink to individual policies. Noted and text to be amended.	 Yes. Text font to be amended.
Sport England	Sport England's aim in working with the planning system is to help provide active environments that maximise opportunities for sport and physical activity for all, enabling the already active to be more so and the inactive to become active. The many benefits of sport and physical activity, including to people's physical and mental health, are widely recognised. Our built and natural environments are key to helping people change their behaviours to lead more active and healthier lifestyles. Sport England welcomes the emphasis within the draft SPD on the role green and blue infrastructure plays in supporting people to live healthy and active lives. In particular, we consider that the below principles 1; 5 and 6 set out in the SPD align with our own Active Design guidance. Principle 1: Delivery of Multi-Functional GBI Networks	Noted. Noted and comments welcomed.	N/A No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	Principle 5: Contributing to Healthy Living & Well-Being Principle 6: Managing & Maintaining GBI		
	Active Design is a set of 10 guiding principles which have been developed in partnership between Sport England and Public Health England to promote activity, health and stronger communities through the way we design and build our towns and cities. Further detail can be found here: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design.	Noted.	N/A.
	We would strongly recommend, given the synergy between the aims and objectives of the SPD and our own Active Design guidance, that there is specific references to our Active Design guidance/principles within the document.	Noted. Signpost to the Sport England Guidance can be added into Principle 5 of the SPD.	Yes. Add hyperlink to Sport England guidance in Principle 5.
	In relation to the relevant principles within the SPD 1; 5 and 6 above, it is important that movement; physical activity; both formal and informal recreation and sport are considered within the design of multi-functional GBI networks. In particular, there is a strong correlation here with Active Design (AD) principle no. 5:	Noted.	N/A
	• Network of multifunctional open space	Noted.	N/A.

Representor	Summary of Representation	Council's Response	Amend SPD?
	A network of multifunctional open space should be created across all communities to support a range of activities including sport, recreation and play plus other landscape features including Sustainable Drainage Systems (SuDS), woodland, wildlife habitat and productive landscapes (allotments, orchards). Facilities for sport, recreation and play should be of an appropriate scale and positioned in prominent locations. And, and AD principle no. 9: • Management, maintenance, monitoring & evaluation The management, long-term maintenance and viability of sports facilities and public spaces should be considered in their design. Monitoring and evaluation should be used to assess the success of Active Design initiatives and to inform future directions to maximise activity outcomes from design interventions. The remaining Active Design principles are also highly relevant to achieving principle no.5 within the SPD of contributing to healthy living and well-being.	Noted. Principle 6 of the SPD deals with the long term management/maintenance, funding and monitoring of GBI. Noted.	N/A. N/A.
Surrey County Council	We have comments to make regarding landscape, minerals restoration and flooding.		

Representor	Summary of Representation	Council's Response	Amend SPD?
	Landscape The draft SPD is of good quality overall, particularly the sections on guidance for householders and minor/major developments.	Noted and comments welcomed.	N/A.
	However, the maps at the start of the document (maps 1.1 to 1.4) are not particularly legible or helpful due to their large scale. The maps included in the draft SPD could include greater detail identifying specific green and blue infrastructure in the borough, as well as highlighting important areas such as Biodiversity Opportunity Areas (BOAs).	Maps set out within the SPD annexes highlight areas of GBI in the Borough as well as BOAs, priority habitats, landscape types etc. These have been deliberately placed in the annexes to reduce file size and allow reading of the SPD to flow more easily. However, additional labels have been added to Maps 1.2-1.4.	Yes. Additional labels added to Maps 1.2-1.4
	The connectivity of green and blue assets, both in terms of human connectivity (e.g. 'greenways') and that of habitats could also be shown in the maps. The draft SPD may also want to refer to our Surrey interactive map.	Reference to the Surrey Interactive Map can be added to para 4.2.2. The connectivity of green and blue assets in terms of human connectivity via the PRoW network is shown on map 1.4. RBC are not aware of any habitat connectivity data within the study area.	Yes. Add reference to the Surrey interactive map in 4.2.2.
	Although the guide is geared towards private individuals and applicants contributing towards new green and blue infrastructure within Runnymede, the draft SPD could include examples or case studies of the council themselves proactively driving new GBI projects within the borough. The draft SPD could also link to the following guidance;	Noted, however examples (other than SANG) where the Council has been responsible for GBI delivery are limited.	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	• The National Model Design Code (parts 1 and 2) which has very good guidance on green and blue infrastructure and sustainable design principles. • Plant Healthy, which aids the consideration of sourcing trees and other plants from certified members of the Plant Healthy Certification Scheme, in the interests of securing best practice in biosecurity.	Noted. In terms of the National Model Design Code, Section 4 of the SPD includes guidance on green and blue infrastructure principles aligned with the Council's Design SPD. 'Plant Healthy' link can be added alongside the Landscape Institute's Plant Health and Biosecurity Toolkit (p32)	Yes, in relation to 'plant healthy' link.
	<u>Minerals Restoration</u> Minerals site restorations provide an important opportunity to return land to its natural state and therefore improve the green and blue infrastructure offer. We are pleased to see the example used in case Study 4.11 which is inspired by mineral restoration and enhancement work, and an example of such issues delivering multifunctional benefits. We would however like to see greater coverage of minerals site restoration within the document. The key issues and benefits of minerals site restoration are set in the North West Surrey Restoration Strategy, but please SCC for more information.	Noted. Although, it is considered that the GBI SPD would be a material consideration for Minerals schemes, RBC would not be the consenting authority. As such, it will be for SCC as the consenting authority to take account of the guidance set out in the GBI SPD which would be equally applicable to minerals development and restoration in Runnymede as to other types of minor/major developments.	No.
	As a side note, the draft SPD does not include the River Thames Scheme proposal which should be considered as a blue corridor.	Reference is made to the River Thames Scheme (RTS) in the SPD Annex D. The RTS cannot be mapped however, as it has yet to be delivered.	No.

Representor	Summary of Representation	Council's Response	Amend SPD?
	<u>Flooding</u> Our flooding team have provided the below general comments; • On p.43/44, the 'all development' section should include the use of SuDS on all development which is in accordance with the NPPF.	Noted, however NPPF para 169 only refers to major developments not minor developments. Nevertheless Policy EE13 of the 2030 Local Plan asks for SuDS in new development and reference to this can be added to Box 4.10	Yes. Add reference to Policy EE13 in Box 4.10
	• On p.45, our LFRMS should be included in the list of documents.	Hyperlink to Local Flood Risk Management Strategy to be added to p45.	Yes. Add hyperlink to Surrey LFRMS
	• Within section 3.6.1, this should link to p.43-44 whereby all development should include SuDS.	Noted, however, the NPPF para 169 only refers to major developments not householder development.	No.
	• As a general note, SuDS should be encouraged on all new development as per the NPPF.	See above in respect to Box 4.10. Section 3 of the SPD already encourages householders to incorporate SuDS	Yes. Add reference to Policy EE13 in Box 4.10.
Surrey Gardens Trust	This response is submitted on behalf of the Surrey Gardens Trust (SGT), a member of the Gardens Trust that is the statutory consultee for Registered Parks and Gardens.	Noted.	N/A
	The proposals look to be a very useful tool adding to the considerations required by part 16 of the NPPF for heritage assets such as parks and gardens.	Noted and comments welcomed.	N/A
	While within the Borough the Registered sites are broadly in the "Wider Countryside" there are other sites that might be considered as non-designated heritage assets that are within or adjoining the built-up areas. These	Noted.	N/A

Representor	Summary of Representation	Council's Response	Amend SPD?
	would, of course, be covered by the acknowledgement in the proposals that sites of a more domestic scale also contribute to the Borough's Green infrastructure.		
Transport for London	we have no comments to make on the draft SPD.	Noted.	N/A.