



Planning Committee

Wednesday, 13 April 2022 at 6.30 pm

**Council Chamber, Runnymede Civic Centre,
Addlestone**

Members of the Committee

Councillors: M Willingale (Chairman), P Snow (Vice-Chairman), D Anderson-Bassey, J Broadhead, D Cotty, R Edis, L Gillham, M Kusneraitis, C Mann, I Mullens, M Nuti, J Sohi, S Whyte, J Wilson and Vacancy

In accordance with Standing Order 29.1, any Member of the Council may attend the meeting of this Committee, but may speak only with the permission of the Chairman of the Committee, if they are not a member of this Committee.

AGENDA

- 1) Any report on the Agenda involving confidential information (as defined by section 100A(3) of the Local Government Act 1972) must be discussed in private. Any report involving exempt information (as defined by section 100I of the Local Government Act 1972), whether it appears in Part 1 or Part 2 below, may be discussed in private but only if the Committee so resolves.
- 2) The relevant 'background papers' are listed after each report in Part 1. Enquiries about any of the Agenda reports and background papers should be directed in the first instance to **Mr B A Fleckney, Democratic Services Section, Law and Governance Business Centre, Runnymede Civic Centre, Station Road, Addlestone (Tel: Direct Line: 01932 425620). (Email: bernard.fleckney@runnymede.gov.uk).**
- 3) Agendas and Minutes are available on a subscription basis. For details, please ring Mr B A Fleckney on 01932 425620. Agendas and Minutes for all the Council's Committees may also be viewed on [Committee Meetings – Runnymede Borough Council](#)
- 4) Public speaking on planning applications only is allowed at the Planning Committee. An objector who wishes to speak must make a written request by noon on the Monday of the week of the Planning Committee meeting. Any persons wishing to speak should email publicspeaking@runnymede.gov.uk

5) In the unlikely event of an alarm sounding, members of the public should leave the building immediately, either using the staircase leading from the public gallery or following other instructions as appropriate.

6) **Filming, Audio-Recording, Photography, Tweeting and Blogging of Meetings**

Members of the public are permitted to film, audio record, take photographs or make use of social media (tweet/blog) at Council and Committee meetings provided that this does not disturb the business of the meeting. If you wish to film a particular meeting, please liaise with the Council Officer listed on the front of the Agenda prior to the start of the meeting so that the Chairman is aware and those attending the meeting can be made aware of any filming taking place.

Filming should be limited to the formal meeting area and not extend to those in the public seating area.

The Chairman will make the final decision on all matters of dispute in regard to the use of social media audio-recording, photography and filming in the Committee meeting.

**List of matters for consideration
Part I**

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Matters in respect of which reports have been made available for public inspection

1. **Notification of Changes to Committee Membership**

2. **Minutes**

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To confirm and sign, as a correct record, the Minutes of the meeting of the Committee held on 23rd March 2022 (Appendix 'A').

3. **Apologies for Absence**

4. **Declarations of Interest**

Members are invited to declare any disclosable pecuniary interests or other registrable and non-registrable interests in items on the agenda.

5. **Planning Applications**

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Item No.	Application No.	Location	Page
5A	RU.20/1729	Silverlands house, Holloway Hill, Lyne	9

6. **Affordable Housing Supplementary Planning Document (SPD) Initial Consultation**

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7. **Consultation of Draft Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Scoping Report for the 2040 Local Plan**

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8. **Exclusion of Press and Public**

Part II

Matters involving Exempt or Confidential Information in respect of which reports have not been made available for public inspection

Runnymede Borough Council

Planning Committee

Wednesday 23 March 2022 at 6.30 pm

Members of Committee present: Councillors M Willingale (Chairman), P Snow (Vice-Chairman), D Anderson-Bassey, J Broadhead, M Cressey (Substitute, in place of Cllr C Mann), R Edis, I Mullens, M Nuti, S Whyte S Williams (Substitute, in place of Cllr L Gillham), and J Wilson

Members of the Committee absent: Councillors D Cotty M Kusneraitis and J Sohi

Minutes

The Minutes of the meeting held on 2 March,2022 were confirmed and signed as a correct record.

Apologies for Absence

Apologies were received from Councillors Cotty, Kusneraitis and Sohi.

Declarations of interest

No declarations of interest were made.

Planning Application

The planning application listed below was considered by the Committee. All representations received on the application were reported and copies had been made available for inspection by Members before the meeting. The Addendum had also been published on the Council's website on the day of the meeting. An Objector and Applicant addressed the Committee on the application .

RESOLVED that –

the following application be determined as indicated: -

APP NO LOCATION, PROPOSAL AND DECISION

RU 21/0272 Land at Green Lane, Chertsey

Hybrid planning application for the land north of Green Lane, Chertsey Bittams: Full planning application for residential development (use Class C3) comprising 149 dwellings;5 gypsy and traveller pitches and associated works; informal and formal open space, footpaths, cycleways and internal roads; associated parking, landscaping, planting, utilities and drainage infrastructure including connection to the strategic foul network; and associated infrastructure and groundworks. Outline planning application for the use of 0.1 hectares of land for the provision of a community hub.

Some Members made comments on the timing of the development against the timescales of the A320 improvement delivery, the need for mature planting to mitigate noise, the location of the community hub, the potential impact of works on Salesian School especially during exam period ,increased pressure on capacity of schools and medical facilities, impact from M25 on future occupiers and users of the development, the date of operation of the space allocated for the car club scheme, density of development and impact of the development when combined with the other neighbouring developments for the Bittams triangle, lack of accessibility of SANG in Hardwick Lane for those on foot, clarification of location of informal crossing, and need for traffic calming measures in Green Lane

The CHDMBC stated that the site was allocated for development by the Runnymede 2030 Local Plan and the principle of development was therefore established.

In the opinion of the CHDMBC the scheme had many positive facets including a well considered design taking into account constraints, policy compliant affordable housing, full gypsy and traveller provision, a full contribution to the A320 improvement works and land for a community building.

The Committee acknowledged and welcomed many of these elements and noted the improvements made to the application since its original submission and thanked the Applicant and Officers for their work thereon.

The first housing occupations were expected by the developer to occur in 2023 and it was estimated that there would in a worst case scenario be a maximum of 50 dwellings occupied in advance of the completion of the A320 improvement scheme in April 2024. SCC considered that requiring the A320 works to be completed in advance of occupation would be unreasonable and raised no objection subject to a section 106 obligation and appropriate conditions.

With regard to landscaping, existing planting boundaries would be retained and enhanced and loss of any trees would be mitigated by the proposed substantial new mature tree planting. Appropriate conditions would be imposed and details secured in the landscaping plan.

As regards noise from the M25, a 5m high acoustic barrier was proposed in addition to the existing 2m high highway noise barrier. The layout had been planned to help reduce noise impact. Increased glazing, ventilation measures and boundary treatments were proposed to dwellings in proximity to the M25.

Appropriate air quality assessments had been undertaken and improvements secured to the scheme. The reports had been assessed by independent specialist consultants on behalf of the Council, and it was considered that an acceptable level of amenity in planning terms would be achieved for the new residents and users of the site. It was also noted that some residents of Green Lane are likely to experience betterment in terms of noise as a result of the scheme.

Some Members noted that the surface of this section of the M25 was in poor condition and particularly noisy. Whilst the surface of the M25 was a matter for the Highways Agency, the Vice- Chairman mentioned that the local MP was seeking improvements to the surface and Members were encouraged to write to the MP.

As part of the Construction Management Plan, the developer would be required to write to neighbours (including Salesian School) to provide a named contact at the developer. This named contact would be the main point of escalation concerns to in relation to the management of noise and similar construction related issues (in particular during exam periods). The developer would be encouraged to notify Salesian School when noisy works were expected to occur at sensitive times.

The impact on infrastructure had been addressed in the Infrastructure Needs Assessment undertaken as part of the recently adopted Local Plan. A new GP surgery was proposed for Ottershaw East, and RBC and the NHS were working together to improve GP capacity. Whilst resident concerns were noted on this and the Council seeks to help resolve this matter, the impact of this development upon medical capacity would not be severe enough to warrant refusal of an application, particularly as its impact had already been considered in the local plan evidence.

Provision of capacity in schools was a matter for the County Education Authority and was planned for with education projections, and education mitigation was generally covered by the RBC CIL regime.

The CHDMBC would consider imposition of a mechanism for the earlier trigger point for operation of the space allocated for the car club. This could be via condition 25 or by travel plan mechanisms.

The proposed SANG in Hardwick Lane previously granted under RU 21/0265 would have more than sufficient capacity to mitigate the impact of the development and most users would access the SANG by car.

Relocation of the community hub from the rear to front of site was an improvement in that it was more accessible and could be delivered earlier.

The location of the informal crossing and traffic calming was a matter for SCC as Highway Authority, but it was unreasonable to require the applicant to address existing problems relating to Green Lane.

RESOLVED that-

i)The CHDMBC be authorised to grant planning permission subject to the completion of a section 106 legal agreement under the Town and Country Planning Act 1990 (as amended) to secure the following obligations:

- 1. SAMM (TBHSPA) financial contribution of £124,362;**
- 2. Proposed SANG (or a phase of the SANG if appropriate) granted under RU.21/0265 must be delivered prior to occupation of any development at the Bittams A site or any other site which may be assigned to the proposed SANG;**
- 3. The provision of 5 Gypsy & Traveller pitches including a clear phasing for their timely delivery;**
- 4. The provision and deliverability of 35% Affordable Housing;**

5. **Secure management arrangements for the maintenance of the open space and equipped play spaces;**
6. **Provision of 0.1ha of land to be provided for a Community Hub Building;**
7. **To secure through a Section 278 Agreement with the Local Highway Authority the cycle and pedestrian crossing points across Green Lane;**
8. **To secure the preparation and implementation of a Travel Plan;**
9. **Transportation improvements and contributions, including:**
 - a) **A financial contribution of £2,555,202 towards mitigation measures on the A320**
 - b) **Travel plan auditing fee of £6150**

And conditions, reasons and Informatives listed on the agenda and additional conditions listed on the Addendum. The CHDMBC to consider imposition of a mechanism for the earlier trigger point for operation of the space allocated for the car club. This could be via condition 25 or by travel plan mechanisms

All figures and contributions will also need to be finalised in negotiation with the applicant and relevant consultees and final authority in these negotiations is given to the CHDMBC.

ii)The CHDMBC be authorised to refuse planning permission should the S106 legal agreement not progress to his satisfaction or if any significant material considerations arise prior to the issuing of the decision notice that in the opinion of the CHDMBC would warrant refusal of the application. Reasons for refusal relating to any such matter are delegated to the CHDMBC.

(Mrs Pudney, an objector, and Mr Newton, for the applicant, addressed the Committee on the above application)

(The meeting ended at 7.36 pm)

Chairman

Planning Applications

The planning applications to be determined by the Committee are attached. Officers' recommendations are included in the application reports. Please be aware that the plans provided within this agenda are for locational purposes only and may not show recent extensions and alterations that have not yet been recorded by the Ordnance Survey.

If Members have particular queries on the applications, please contact Ashley Smith, Corporate Head of Development Management and Building Control by two working days before the meeting

Copies of all letters of representation are available for Members and the public to view on the Planning pages of the Council website

<http://planning.runnymede.gov.uk/Northgate/PlanningExplorer/GeneralSearch.aspx>.

Enter the planning application number you are interested in, and click on documents, and you will see all the representations received as well as the application documents.

(To resolve)

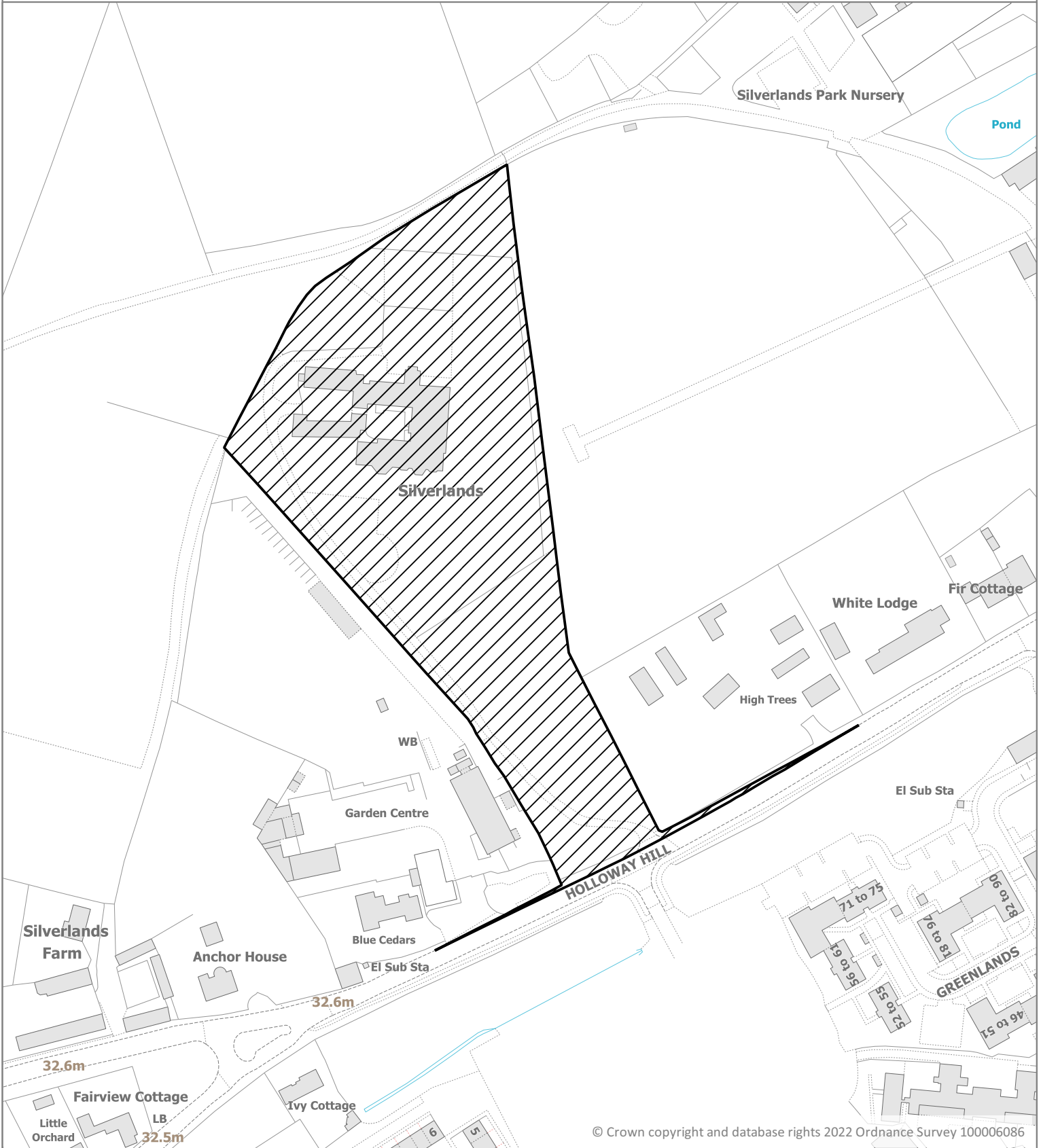
Background Papers

A list of background papers is available from the Planning Business Centre.



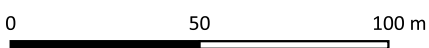
Date: 13/04/2022

Silverlands House, Holloway Hill, Lyne



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RU.20/1729



COMMITTEE AGENDA REFERENCE: 5A

APPLICATION REF:	RU.20/1729
LOCATION	Silverlands House, Holloway Hill, Lyne, KT16 0AE
PROPOSAL	Proposed conversion and change of use of the vacant Grade II Listed Building previously in C2 use (residential institution) to provide 14 apartments, proposed conversion and extension of the Coach House to provide 6 dwellings and the construction of 5 new two storey dwellings (4 x semi-detached and 1 x detached) including associated landscaping, access, car parking, associated engineering works and detached bin and cycle stores.
TYPE	Full Planning Permission
EXPIRY DATE	Extension of time agreed until 21 April 2022
WARD	Longcross, Lyne and Chertsey South
CASE OFFICER	Christine Ellera
REASON FOR COMMITTEE DETERMINATION	Major Development
<i>If you have questions about this report please contact Ashley Smith, Victoria Gibson or the case officer.</i>	

1. SUMMARY OF RECOMMENDATION

It is recommended the Planning Committee authorises the CHDMBC:	
1.	To approve the application subject to the completion of the unilateral undertaking (UU) and planning conditions
2.	To refuse planning permission at the discretion of the CHDMBC should the UU not progress to his satisfaction

2. DETAILS OF THE SITE AND ITS SURROUNDINGS

- 2.1 The application site relates to a large 2-3 storey Grade II Listed Building set within a 2 hectare site and accessed from the north of Holloway Hill.
- 2.2 The Historic England Listing describes the site as a large country house, initially built as a private house, the building was used as a war hospital in the First World war, from 1938

and was the home of the Actors' Orphanage for "destitute children of actors and actresses" and later became a nurses' training school for St Peter's Hospital. The listing notes that the site is mainly yellow brick with some brown brick with stone dressings and entrance lobby and library are of stone. Slate roofs; one, two or three storeys with irregular windows.

- 2.3 The building has lain empty for c.18- 20 years following aborted plans by the government to convert it into a psychiatric in-patient residential clinic in 2001. It is now in very poor physical condition, largely due to repeated and frequent incidents of break-ins and vandalism, including the theft of large quantities of lead from the roofs, which has led to water ingress; it is therefore becoming increasingly more urgent that a new and viable use for the building is secured.
- 2.4 The site is located within the designated Green Belt of the Borough. Surrounding uses include; residential (including the adjacent gypsy and traveller site), the commercial uses of Silverland Stone and also St Peters hospital on the southern side of Holloway Hill.
- 2.5 Constraints can be summarised as follows:
 - Grade II Listed Building
 - Green Belt
 - 5KM SPA boundary
 - Tree Preservation Order (TPO)

3. APPLICATION DETAILS

- 3.1 The proposed development can be summarised as extensions and alterations to the existing Listed Building and Coach House, as well as the construction of further units within the grounds to provide a total of 25 units on this site, along with 48 parking spaces (14 being Electric Vehicle Charging points) and associated landscaping.
- 3.2 This can be described in 3 distinct parts as follows:
Main House- 14 units
- 3.3 The proposal seeks to convert the proposed listed building to residential flats, which can be summarised as follows
 - Basement- x2 two bedroom and x1 one bedroom units (total of 3 units)
 - Ground floor- 4 two bedroom and x1 one bedroom units (total of 5 units)
 - First floor- x1 three bedroom and x3 two bedroom units (total of 4 units)
 - Second floor- x2 one bedroom units (total of 2 units)

A total of x26 parking spaces are proposed for these units (x3 with Electric Vehicle Charging points).

- 3.4 To enable the proposed basement flats, new light wells would be formed to the north and eastern elevation and the existing lightwell to the south/ central courtyard would be enlarged. New external basement stairs would also be installed. Alterations to the front entrance to allow for disabled access via a lift are also proposed. The works will also reinstate balustraded parapet to all those locations from which the original was removed and the various chimneystacks that have been truncated will be reinstated to their original proportions.

Coach House- 6 units

- 3.5 The proposal is to convert the coach house (located to the rear/ west of the main house) and construct an additional wing, of a similar form and scale with split eaves dormer windows. This would form a new courtyard and “mews” type of development.

- This would provide x5 two bedroom and x1 three bedroom unit (total of 6 units).

A total of x12 parking spaces are proposed for these units (x7 with Electric Vehicle Charging points).

- 3.6 The two bedroom units would be contained over two floors, the three bedroom unit would have accommodation continued within the roof of the existing second floor. All entrances would be off the proposed new courtyard.

Development within the grounds providing 5 units

- 3.7
- The “Pavilion”- x1 three bedroom unit positioned to the north of main house. Two parking spaces are proposed for this units (x1 with Electric Vehicle Charging points)
 - The “Gatehouse” would be formed of x4 three bedroom units, in the form of two pairs of semi-detached units. These would be located to the south of the main house. A total of x8 parking spaces are proposed for these units (x4 with Electric Vehicle Charging points).

- 3.8 All buildings would be in the form of single storey properties, with accommodation in the roof, facilitated through split eaves dormer windows.

Other works proposed

- 3.9 Bin and bicycle stores are proposed in x3 locations within the site; to the west of the Coach House; to the north of the site next to the Pavilion and to the northeast of the gate house development. Each store is shown to provide refuse bins and space to accommodate x12 bicycles (a total of 34 cycle spaces across the 3 stores).
- 3.10 The proposed plans also include alterations to the existing access to the site from Holloway Hill. The revisions to the existing access including:
- Widening/ revision to the access
 - New pavement to facilitate access into the site/ by the access as well as on the highway and tactile pavement to facilitate in crossing location on the road
 - Keep clear markings
 - Removal of hedging to provide visibility splays
 - New retaining wall to enable these changes

- 3.11 Internal alterations would also be required for both the main house and the existing parts of the coach house. These do not require planning permission and are considered as part of the listed building application which sits alongside this planning application (and will be considered under delegated authority further to the outcome of this planning application).

Phasing

- 3.12 The phasing plan indicate that works would be undertaken in the following order:
1. Works to convert the main house
 2. Below ground works to the Coach House
 3. Works to build the development within the grounds of the site
 4. Final landscaping works would then be undertaken once completed

3.13 Plans have been amended since the initial submission; this has been subject to a full re-consultation exercise.

4. RELEVANT PLANNING HISTORY

4.1 There is extensive planning history to this site, the following is considered to be the most relevant and recent to this application:

Reference	Details
RU.20/1730	Listed Building Consent for the conversion and change of use of the vacant Grade II Listed Building to provide 14 apartments, proposed conversion and extension of the Coach House including the removal of internal partitions, floors, ceilings and parts of the existing roof of the main building and the south wing of the Coach House, demolition of the boiler flue stack and removal of sarking boards from pitched roofs. Pending Considerations: alongside this planning application
RU.17/1909	Listed Building Consent for the removal of rubble, rotten plaster and timber off floors, the removal of rotten floor timbers in the library, the installation of propping from the basement to the second floor (see drawings 50,51,52 & 53), the removal of rotten floor joists, the removal of infected plaster/detritus, the ventilation of the building, timber treatment any remaining timbers, replacement floor structure, the labelling and removal of cast iron radiators, doors and ironmongery to a secure dry location for later re-use within the building and the demolition of the two existing brick outbuildings. Building Consent granted: 18.01.2018
RU.17/1591	Listed building consent for erection of scaffolding and temporary roofing. Listing Building Consent granted: 03.11.2017
RU.01/0973	Listed building consent Internal and external alterations in order to convert building to psychiatric in-patient residential clinic. Withdrawn; 07/11/2001

5. SUMMARY OF MAIN RELEVANT STRATEGIES AND POLICIES RELEVANT TO THE DECISION

5.1 Planning (Listed Buildings and Conservation Area) Act 1990

5.2 *National Planning Policy Framework* (revised July 2021)- acts as guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications. At the heart of the NPPF is a presumption in favour of sustainable development. The document, as a whole, forms a key and material consideration in the determination of any planning permission.

5.3 *The Runnymede 2030 Local Plan* was adopted on 16 July 2020 and the policies have to be read as a whole. Any specific key policies will be referred to in the planning considerations.

5.4 SPGs which might be a material consideration in determination:

- Infrastructure Delivery & Prioritisation SPD
- Thames Basin Heaths Supplementary Planning Document (SPD)
- Green and Blue Infrastructure SPD
- Runnymede Design Supplementary Planning Document (SPD)

- Car Parking Supplementary Planning Guidance (2001)

6. CONSULTATIONS CARRIED OUT

Consultees responses

6.1 Comments raised from consultees can be summarised as follows:

Consultee	Comments
Historic England:	No objection- On the basis of the information available we do not wish to offer any comments.
Natural England:	No objection- As long the applicant is complying with the requirements of Runnymede's Avoidance and Mitigation Strategy for the Thames Basin Heaths SPA (through a legal agreement securing contributions to Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM)), Natural England has no objection to this application. Natural England considers that the proposed development will not have likely significant effects on the SWLWB Special Protection Area and has no objection to the proposed development.
Environment Agency:	No objection- This planning application is for development we do not wish to be consulted on.
Surrey County Council Highways	No objection- Having assessed the application on safety, capacity and policy grounds, raised no concerns subject to conditions including the provision of a footway and an informal pedestrian crossing point to allow access to the footway on the opposite side of Holloway Hill. These works will require the Applicant to enter into a S278 agreement with the Highway Authority
Lead Local Flood Authority	No objection- We are satisfied that the proposed drainage scheme meets the relevant requirements and are content with the development proposed, subject to conditions.
Surrey County Council Archaeology	No objection- The first stage of the archaeological examination of this site should be to conduct an appropriately scaled evaluation of the area of the proposed new buildings through trial trenching, which will aim to create a more accurate picture of the site's archaeological potential and make recommendations as to what (if any) further archaeological work is required. This can be dealt with by way of condition.
Surrey County Council as the Mineral and Waste Planning	No objection- We do not have any specific comments to make on this consultation.

Authority	
Conservation/ Listed Building Officer:	<p>Supports this proposal- This building and its near irreparable condition. Silverlands has been empty and unused for 19 years, and prior to that has suffered various institutional uses over very many years. The fact that it has not been completely destroyed or burnt out is remarkable. The level of dereliction of this building is the worst I have seen in many years. It is my view that the change of use to residential is the only possible new use for the entire complex and would only be viable with a limited number of new properties suitably located within the grounds. They have suggested a very modest five units and these are located suitably distanced from the house and outbuildings to avoid harming the setting of the listed complex. Silverlands will still be dominant when viewed across the sunken lawn while the single detached house to the north is well removed from the principal entrance.</p> <p>The five new properties are not officially described as 'enabling development' but to all intents and purposes they fulfil that function and claim exceptional circumstances which I agree with. There is also a good use of ground levels and remodelling in association with access roads and parking areas. The existing tree cover is respected and will be supplemented with new indigenous planting. My view is that RBC should exercise their option of treating this application with some flexibility as the only way of bringing this derelict building back into a sustainable long-term use. This can be achieved with minimal alterations to the exterior of these listed buildings.</p> <p>As for the internal subdivision to facilitate 14 units, this has been done sensitively and retains the grand entrance hall and principal access corridor. I consider these proposals form the basis of an excellent restoration scheme for this complex of dilapidated structures.</p>
Drainage Officer	No objection- No further comments on this application except concurring the drainage conditions recommended by LLFA
Arboricultural Officer	<p>No objection- The application is supported by a tree report which demonstrates the retained trees can be protected during the development. The trees to be removed are young trees to enable a new drive, the loss of these trees can be mitigated as there will be space to introduce new trees which has the potential to greatly enhance the existing landscape diversity. However, as the site layout has changed it will be necessary to update the tree protection plan to include the new layout and modify the tree protection where necessary</p> <p>If planning permission is granted conditions requiring an up dated tree protection plan and requiring the recommendations of the AMS are implemented.</p>
Environmental Health Officer	No objection- If local residents are to be introduced to an area with mixed residential and commercial usage then as "agents of change" it would be expected that the applicant has to take this into account. I did see specific mention of this aspect with regards to Silverland Stone. The assessment concluded " <i>The predicted external daytime and night-time operational noise levels at all are below the monitored background noise level by at least 6dB.</i> "We recommend the planning team contact Silverland Stone and make enquires as to the operation and its potential impact that new residents closer to their operation may have.

Contaminated Land Officer	No objection- The site investigation submitted shows requirement for remediation of soils in one area. Conditions will therefore need to be attached to nay planning permission to ensure works are undertaken in an acceptable manner.
Waste and Recycling officer	No objection- subject to conditions regarding details of bin stores.
Green spaces officer	No objection
Surrey Wildlife Trust	<p>Should you be minded to grant this planning application for this site, the applicant should be required to:</p> <ul style="list-style-type: none"> - Obtain a Protected Species (PS) licence from Natural England following the receipt of planning permission and prior to any works which may affect bats commencing and to; - Undertake all the actions which will be detailed in the Method Statement based on the mitigation, compensation and enhancement actions presented within 5 Recommendations section of the Protected (Bat & Reptile) Species Survey Report, which must support a PS licence application. - If any works to trees with roost suitability is required, the applicant should discuss the requirement for further survey work with their ecologist prior to any works being undertaken. - As a precautionary measure, we recommend works should be undertaken in a precautionary manner to protect Great crested Newts - Construction activities on site have regard to the potential presence of Hedgehog other mammals to ensure that such species do not become trapped in trenches, culverts or pipes - Rhododendron should be eradicated using qualified and experienced contractors and disposed of in accordance with the Environmental Protection Act (Duty of Care) Regulations 1991 - The need for a Construction and Environment Management Plan prior to any works - Provide an appropriately detailed document to demonstrate that a measurable net gain, secure for the lifetime of the development, will be achieved
Thames Water	<p>With regard to wastewater network and sewage treatment works infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p>

Southampton to London Pipeline project	No objection- The application does not fall within the order limits of the DCO as consented and is therefore an exempt application. Therefore, Esso offer no comment on this planning application
Fairoaks Airport	No objection

Representations and comments from interested parties

- 6.2 14 Neighbouring properties were consulted initially on this planning application (some of which have since been demolished to accommodate the Cala homes redevelopment to the southern side of Holloway Hill). In addition, site notices have been displayed and advertised in the local press and on the Council’s website. Further letters of re-consultation were undertaken following being in receipt of amended plans including a further site notice and publication in the press. Following this consultation exercise no letters of representation have been received regarding this planning application.
- 6.3 It is however noted that the Chertsey Society has made a letter of representation in support of the associated application for Listed Building Consent, in which they consider the proposal is a reasonable approach to preserving the shell of the Mansion and retaining the entrance staircase to the Grade II Listed Building.

7. PLANNING CONSIDERATIONS

7.1 In the determination of this application regard must be had to the Development Plan and National policy within the NPPF. The key planning matters are:

- Principle of the development in the Green Belt
- Any other harm to the Green Belt
- Impact to the Heritage Asset
- Wider design considerations
- Housing mix and affordable housing
- Highways Considerations
- “Agents of Change” principle
- Provision of a suitable residential environment
- Environmental Considerations
 - Flooding and Sustainable Urban Drainage
 - Renewable & Low Carbon Energy
 - Impact on Ecology and Biodiversity Considerations
 - Contaminated Land
- Other considerations
 - Impact on neighbouring amenity
 - Infrastructure Considerations
- Very Special Circumstances

7.2 The principle of the development in the Green Belt

7.2.1 The NPPF (2021) in paragraph 149 sets out exceptions where new buildings in the Green Belt need not be inappropriate development in the Green Belt. One of the provisions includes:

- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings),

which would:

- not have a greater impact on the openness of the Green Belt than the existing development

- 7.2.3 The site is considered to fall within the definition of Previously Developed Land. However, for the development, as whole, to be considered appropriate within the Green Belt it would need to be demonstrated that the proposed development would not have a greater impact on the openness of the Green Belt than existing development.
- 7.2.4 The proposed development involves the conversion of the existing buildings to provide 14 units and extension and alterations to the coach house to provide a further 6 units. Whilst this on its own *could* be considered to fall within the above definition, the proposed development also includes the erection of x5 additional units within the grounds of the Listed Building, as well as parking and bin stores. This would spread the built form across a wider part of the site and would have greater impact on the openness of the Green Belt than the existing development.
- 7.2.5 It is noted that the supporting Green Belt Statement and Very Special Circumstances Report prepared by Savills for this planning application has sought to divide the proposal up into separate elements in order to demonstrate that parts of the proposal are “appropriate development” in the Green Belt. This is the incorrect assessment; case Law is clear that the proposal needs to be considered as a whole.
- 7.2.6 Accordingly, the proposal represents inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 7.2.7 The NPPF (2021) is also clear that when considering any planning application substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations
- 7.2.8 A full assessment of the planning application will be undertaken to identify any harm to the Green Belt and any other harm resulting from the proposal. An assessment of Very Special Circumstances will then be undertaken.

7.3 **Any other harm to the Green Belt**

Impact on the openness of the Green Belt

- 7.3.1 There have been a number of High Court decisions regarding how the visual appearance within the Green Belt should be considered. Turner V SSCLG [2016] EWCA CIV 466 has established a number of key principles in relation to openness, including that it is not simply about volume and “visual impact is implicitly part of the concept of “openness of the Green Belt”.
- 7.3.2 Euro Garages Limited v SSCLG [2018] EWHC 1753 (Admin) establishes that greater floor area and/or volume does not necessarily mean that there is a greater impact. It is also necessary to consider “the impact or harm, if any, wrought by the change”
- 7.3.3 This case law is a material consideration. The above case law establishes that ‘openness of the Green Belt’ is not limited to the volumetric approach; the word ‘openness’ is open-textured and many factors are capable of being a material consideration.
- 7.3.4 Whilst it is recognised that a landscape visual impact assessment has been submitted in

support of this planning application the consideration of openness in the Green Belt goes beyond that of which is the visual harm.

- 7.3.5 Currently the form of development on this site is one large house building on the site, with associated driveway and parking area to its frontage. It is also recognised that would this building be used for its former use then there would be a number of vehicular movements associated with it through employees and visitors coming to and from the site.
- 7.3.6 The proposed development would introduce additional residential development and spread of both built form and hard surfacing across a wider part of the site. Thus, having a greater urbanising impact on the Green Belt and thereby spatial harm.
- 7.3.7 It is however recognised that the overall visual impact of this would be more contained. Views from public areas into the site are fairly well contained and because of the ground levels within the site the additional development would be further “sunken” into the setting of the larger mansion.
- 7.3.8 Nonetheless it is considered that the proposed development would have a detrimental impact on the openness of the Green Belt. Having due regard for the above assessment this is considered to result in moderate harm

Impact on the purposes of the Green Belt

- 7.3.9 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence; these are set out in paragraph 138 of the NPPF (2021). Given the sites location and the development proposed it is not considered that the proposal would undermine the proposes of the Green Belt.

7.4 Impact to the Heritage Asset

- 7.4.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that the Local Planning Authority shall have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.
- 7.4.2 Policy EE3: Strategic Heritage Policy of the Local Plan states that development that affects Runnymede’s heritage assets should be designed to protect, conserve and enhance the significance and value of these assets and their settings. The policy further sets out that the sympathetic and creative reuse and adaptation of heritage assets which provide a sustainable future for a heritage asset will be encouraged, where the proposed new use is consistent with conservation of the asset. The delivery of enabling development within the setting of heritage assets which make a positive contribution to, or better reveal the significance of the heritage assets will be encouraged.
- 7.4.3 In addition, the policy is clear that the Council will seek to facilitate the bringing back into appropriate use of any vacant heritage assets (listed buildings and buildings in conservation areas), in order to minimise future risks to the significance of the building.
- 7.4.4 As well as seeking to preserve and enhance Listed Buildings, Policy EE4: Listed Buildings of the Local Plan sets out that the change of use of part, or the whole, of a Listed Building will be supported provided that its setting, character and features of special architectural or historic interest would be preserved and/or enhanced. Consideration will be given to the long-term preservation that might be secured through a more viable use.

- 7.4.5 The above legislation and Development Plan gives a very strong and clear framework which seeks to protect listed buildings and their settings. There is also a clear support for the conversion of Listed buildings where they would seek to maintain, sustain, and enhance the significance and special architectural and historic interest of Listed Buildings.
- 7.4.6 A Historic Building Appraisal and Heritage Impact Assessment have been submitted in support of this planning application, it is understood from this and the listing by Historic England that the earliest parts of the building appear to be the east front which appears of c1845, where originally the access to the house would have been taken from. The house was then reoriented so that the 'new' north wing now incorporated the main entrance.
- 7.4.7 The building has been substantially remodelled and extended in successive phases, each phase of works concealing to differing degrees the phase that went before it. Therefore, and unlike some other Listed building it is difficult to succinctly describe the features of special architectural or historic interest which form the reason for the buildings listing. Section 4 of the Heritage Appraisal does provide a useful summary of the buildings and the significance in heritage terms.
- 7.4.8 In all instances the house itself has lain empty for over 18 years and has suffered as a result, from repeated episodes of intrusion, theft and vandalism. It is also recognised that this systematic vandalism was despite considerable efforts by the owners. Nonetheless this has led to direct physical damage and to secondary damage to fabric from water ingress (for instance from the theft of lead from the roofs). Any drawing showing the building 'as existing' needs to take into account the drastic loss of fabric which occurred over many years.

Conversion of the Listed Building

- 7.4.9 It is clear that a new and viable use needs to be found for the building, in order to prevent this process of deterioration and to reverse the damage that has been done. It is also recognised that the above legislation and policy give a strong presumption in favour of development which would sustain the long terms viability use of the Listed Building.
- 7.4.10 In recognising this, it is considered that a residential redevelopment would appear to be the most pragmatic option to achieve this. Such a use has the ability to retain as many original room proportions and has the ability to provides a clear and long term steward across the site. Accordingly, the proposed new use is consistent with conservation of the asset. The conversion of the Listed Building to residential would therefore preserve and enhance the Listed Building, consistent with the requirements of the above legislation and is supported within the above policy context. The potential impact to the interior and wider detailed works to the Listed Building is considered in the Officers assessment for the accompanying Listed Building Consent.

The Coach House

- 7.4.11 Although the Coach House is an important element of the listed building, the former stable blocks are of relatively limited intrinsic interest. They have been subject to both external and internal alterations in the early and mid-20th century and retain no historic fittings.
- 7.4.12 The conversion and extensions of the coach house yard are considered to be low key and sensitively designed. The new form remains subservient to the central coach house. Overall, these works are considered to be sympathetic to the Listed Building and despite the conversion to residential, preserves the character and features of special architectural

and historic interest.

New build proposals and landscape strategy

- 7.4.13 Five new dwellings are proposed within the grounds of the listed building. Both the Heritage Impact Assessment submitted by the applicants, as well as the Council's own Listed Building Officer consider that the proposed new houses can be comfortably accommodated within the site without harm arising to the setting or significance of the listed building.
- 7.4.14 It is understood that in the late 19th Century the historic maps for this area show that the mansion was once the centrepiece of a large parkland estate, including the Home Farm, dairy and dairy cottage, nine other cottages with gardens housing the undergardeners, coachman and labourers, an aviary and camellia house overlooking a tennis court, a walled kitchen garden, a number of glasshouses and other garden buildings, and a keeper's cottage in the middle of a large woodland plantation.
- 7.4.15 The applicants statement sets out that the houses are proposed in the form of estate cottages. Through discussions as part of this planning application, the design to these buildings has been revised. The revisions now appear as modest and sensitively designed buildings.
- 7.4.16 The site is subject to a holistic landscaping strategy which reinstates a formal garden setting, enhancing the immediate environs of the listed building, while maintaining existing tree and under-storey planting along the boundaries of the site and in the wooded southern area of the site. The strategy incorporates formal planting which doubles as boundary definitions and screening and ensures that the five new houses are incorporated within the setting of the listed building without harm to its significance.
- 7.4.17 Overall, it is considered that the siting of the limited new buildings and landscaping will have a neutral impact on the setting of the Mansion and the dominance of the Mansion over its setting is preserved.
- 7.4.18 To be clear, Historic England guidance considers "enabling development" in the context of heritage assets is development that would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact that it would secure the future conservation of a heritage asset. For the avoidance of doubt the works now proposed when considered in the context of the impact on the heritage assets are NOT considered to fall within this definition. Were this scheme revised (specifically to be akin to the plans previously proposed) the position of officers would likely be different.
- 7.4.19 The consideration of the potential of these units as "enabling development" to justify the development in the Green Belt is considered below as part of the applicant's case for Very Special Circumstances

7.5 Wider design considerations

- 7.5.1 As largely discussed above, works to the Grade II listed building are primarily planned around the refurbishment and conversion into residential dwellings on the basis of preserving the external fabric and appearance of the building as far as possible to maintain its presence and character when viewed externally.
- 7.5.2 In terms of the extensions and additional units, the proposed layout, form and scale of the proposed development would appear as subordinate additions to the historic mansion.

They would also ensure that the dominance of the Mansion over its setting is preserved.

- 7.5.3 In terms of the proposed architectural appearance the proposed development will not fundamentally alter the appearance of the existing buildings as the majority of the proposed work is of an internal nature. It is proposed that the existing exterior brickwork will be cleaned up and the brickwork, stone and render will be repaired and repointed where necessary. Works to reinstate historic features to the roof and repair windows are also proposed.
- 7.5.4 The coach house will require some external revisions and alterations including one small window opening converted to a door opening, new dormer windows and Conservation rooflights. The southern block is proposed to undergo a greater degree of alteration to support the new use of three dwellings -works include this block being raised in height by c.1.5m; this will make the eaves level comparable to that of the northern block. New windows and dormer windows would also be required. All are sympathetic additions to the more modern "wing" of the building. Extensions will be required to match the existing and such matters can be secured by way of recommended condition 8.
- 7.5.5 In terms of the x5 new dwellings, referred to as the proposed gatehouse and pavilion development. The revised plans demonstrate that the proposed development would utilise materials and finishes which would reflect and respond to the historic fabric of the building. It will be expected that the proposed material finish will be high quality and respond to the yellow brick, limestone and render of the main house. Such matters can be dealt with by way of condition.
- 7.5.6 The applicant's proposed landscape strategy is based on a parkland setting for the main house. Much of the soft landscaping will be through retaining and managing the existing grounds of the house and having the areas around the main house laid to lawn and the existing woodland towards the southern end managed and maintained for biodiversity improvements. Proposed new footpaths are shown across the site and hardstanding to create private terrace areas for ground floor flats/ proposed new houses are also shown.
- 7.5.7 The proposal does result in a significant increase of hard surfacing, largely due to the proposed level of car parking proposed and the driveways necessary to facilitate it. Much of the car parking is contained to the north the site. It is recognised that currently much of this area is already laid to hard surface. However, in addition to this further car parking is proposed to the east of the existing house. The eastern elevation forms an important frontage to the site and there are some concerns that this additional parking and driveway could undermine its setting. That being said, it is recognised that the parking is at a lower level to the existing house and as such its prominence and its ability to detract from its setting would be less harmful. As discussed further below in the parking considerations it is noted that the scheme provides parking spaces well above the current recognised standards for development of this size. Whilst the level of parking has been considered appropriate in that assessment it doesn't negate the officers' concerns that a reduction in the levels of parking could improve the setting and landscaping of the proposal.
- 7.5.8 In terms of proposed trees. The Arboricultural Method Statement, which has been submitted in support of the planning application demonstrates that the retained trees can be protected during the development. There are some trees proposed to be removed to enable the new driveway/access arrangement. It is considered that the loss of these trees can be suitably mitigated as there is ample space to provide replacement planting within the site which has the potential to greatly enhance the existing landscape diversity. The Tree officer has raised no objections subject to recommended condition 7.

7.6 **Housing Mix and Affordable Housing Provision**

- 7.6.1 Policy SL19 deals with Housing Mix and Size Requirements. This sets out that developments of this size will be required to contribute to meeting the Housing Market Area's identified housing needs by generally providing a housing mix as set out in the Strategic Housing Market Assessment or any similar evidence for market and affordable units. The needs of the Borough are largely for 3 bedroom units, and then 2 bedroom units.
- 7.6.2 The proposed development would provide x7 three bedroom, x14 two bedroom and x4 one bedroom units. Whilst this mix is more geared towards two bedroom units, the conversion of a listed building does limit the layout and size of the proposed units. In views of this and as the proposal does provide a good range of units, whilst having regard for this constraint, the proposed housing mix is considered acceptable.
- 7.6.3 In terms of affordable housing provision policy SL20 sets out that Development proposals of 10 or more (net) additional dwellings will be expected to provide 35% of dwellings as affordable units. It also sets out that where viability evidence demonstrates that the full amount of affordable housing cannot be delivered the Council will negotiate a level of on-site affordable housing.
- 7.6.4 As detailed above there are a number of key viability issues associated with this site and the costs associated in bringing the building back to viable use. A Financial Viability Assessment has been submitted in support of this application, prepared by Savills and dated November 2020. This has been reviewed by an independent financial adviser. The outcome of this is that the conversion and extensions of the main house and coach house would result in a deficit of circa £1.8 million. Having regard for the "enabling" development of the 5 additional houses the scheme would be in defect by circa £600k. This is based on an assumed developer profit of 17.5% (i.e. a lower developer profit circa 16% would make the scheme viable but without any affordable housing provision). Overall, it is considered that given the extensive cost of bringing the building back into viable use the scheme cannot viably bear any affordable housing provision, on site or otherwise.

7.7 **Highways Considerations**

Sustainable transport

- 7.7.1 Policy SD3 of Local Plan deals with Active and Sustainable Travel. This sets out that the Council will support proposals which enhance the accessibility and connectivity between people and places by active and sustainable forms of travel. This includes supporting developments which integrate with or provide new accessible, safe and attractive active and sustainable travel networks and routes to service and employment centres and rail interchanges.
- 7.7.2 The NPPF (2021) is also clear that proposals should be designed to give priority to pedestrian and cycle movements having due regard for the wider areas and design access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.
- 7.7.3 In terms of giving priority to sustainable transport modes, it is recognised that the site is outside of the urban area. With the exception of the hospital, the site is not in close proximity to shops and facilities. Although the entrance to the site (some 20m below the main house) is immediately adjacent to a bus stop, given the locality it is likely that future occupiers would largely rely on private vehicles to come to and from this site.

- 7.7.4 Whilst this weighs against the scheme, the above assessment on the Listed Building sets out the clear presumption in converting the building back to a viable use. It is also considered by officers that the most appropriate use would be for residential. In accepting this it is recognised that the proposal would be one which would largely be reliant on private vehicles.
- 7.7.5 It is also noted that the proposed development would provide 14 electric vehicle charging points. In addition, and through negotiations the developer has confirmed that provisions will be made for the rest of the parking spaces to have a passive charging space where car parking spaces can be upgraded to “live” spaces as and when there is future demand. This goes beyond the requirements of the policy and does seek to provide some contributions towards sustainable modes of transport.

Highway safety and capacity considerations

- 7.7.6 The proposed development would not result in a significant increase of vehicle movements, above and beyond the previous uses of the site. However, the current access arrangement onto Holloway Hill is constrained. In order to facilitate in vehicle access and egress (including delivery vehicles) some minor revisions to the access are proposed. This includes a section of pavement by the access to remove any conflict between vehicles and pedestrians walking to and from the development. It also provides for tactile paving crossing to the main stretch of pavement along Holloway Hill. Such matters can be secured by way of condition (see recommended condition 17).

Parking provision

- 7.7.7 Whilst the Council have adopted Parking Standards these were prepared in 2001. Being some 20 years old they do not reflect modern standards or requirements and as such can only be given limited to no weight in assessing planning applications.
- 7.7.8 Surrey County Council have prepared “Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development” dated November 2021. These standards provide a far more up to date Guidance based on current day standards and are given greater weight in assess development proposals. This advises that for 1 - 2 bedroom flats in suburban edge/ rural locations units should have 1 space per unit as a maximum. For two bedroom houses 1.5 spaces per unit and 3 bedroom houses 2 spaces per units.
- 7.7.9 The guidance does recognise that where space permits it may be appropriate to consider increased provision for dwelling houses. Visitor spaces are also encouraged where appropriate, in addition to these standards.
- 7.7.10 The proposed development includes 14 flats (x1 three bedroom, x 11 two bedroom and x2 one bedroom) with a total of x26 parking spaces. This would provide x1 space per one bedroom unit and x2 spaces for all other units. This is well above the maximum guidance, which would be closer to 13 spaces.
- 7.7.11 The 6 units forming the Coach House would all have x2 spaces per unit, around 3 spaces above the maximum standards. The units forming the Pavilion and the Gatehouse would also have x2 spaces per unit but given these are larger units, 2 spaces per unit are in line with the maximum standards.
- 7.7.12 Overall, the scheme provides around 16 spaces above the guidance for maximum standards. However, it is recognised, as detailed above, that the sites location means that future residents will likely largely rely on private vehicles. In addition, the two bedroom flats are of such a generous size more akin to the space requirement of a two +

bedroom house, with greater demand for private vehicles. The additional space would also facilitate in visitor parking spaces (given there is no ability to utilise “on street parking” in this location).

- 7.7.13 Therefore, and whilst a lower level of parking would be more consistent with the relevant guidance, it is necessary for this scheme to be designed from the onset to have regards for likely car ownership levels, reflecting the unique form of this development. Moreover, reducing the parking provision could result in indiscriminate parking, which in the long term could undermine the landscape strategy and/or setting of the listed building. Conditions can also secure that the proposed parking areas utilise suitable materials to respond to the setting of the listed building. It is also note that Surrey County Council have raised no objections to this scheme.
- 7.7.14 A total of 34 cycle spaces are shown to be contained in communal stores across the site. These are considered to provide sufficient storage for future occupiers, consistent with the above standards.
- 7.7.15 Overall, the parking provision is one which is considered acceptable. Were this site in a more sustainable/ accessible location and not facilitated by a long private drive, up a slight hill to access this property, then this assessment would likely have been different.

7.8 “Agents of change” Principle

- 7.8.1 Policy EE2: Environmental Protection of the Local Plan sets out that development proposals should be integrated effectively with existing businesses and community facilities. The NPPF (2021) further states beyond this that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.
- 7.8.2 Where the operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed. In this case the consideration is “Silver and Stone” a landscape supply store with retail and display area towards the front of the site with a larger open storage/ service areas of materials to the rear running parrel to the site, up as far as the existing house. The boundary between the sites is defined by a number of mature trees, and the rear storage/ service area appears to have been excavated and is at a lower level than the application site. However, the nature of the works is such that the activities and noise has the ability to resonate and be heard from the proposed development.
- 7.8.3 A Noise Assessment prepared by Air & Acoustic Consultants dated September 2020 has been submitted in support of this planning application. This considers the potential impact on this adjoining site. This had regard for the worst-case scenario for when the site is in operation, including deliveries, loading stone, stone cutting. Based on the relationship and that the adjoining site the report has assessed that there are no likely adverse effects, and no further action is required. On this basis it is considered that the proposed development would not unduly fetter the operations of the adjoining site.

7.9 Provision of a Suitable Residential Environment

- 7.9.1 All proposals are expected to provide high quality homes. Policy EE1 states that development proposals should ensure no adverse impact on the amenities of occupiers of the development proposed. In addition, Policy SL19 of the Local Plan sets out the minimum floor space standards expected for new development to accord with. The Council adopted SPD on Design provides further guidance of some more the *qualitative*

expectations, particularly contained in design standard 24. This includes ensuing new development provide suitable levels of natural daylight and sunlight to new (and existing) properties. Flated developments should be seeking to deliver dual aspect units and in all cases avoiding single aspect north facing units. Development is also expected to provide suitable ventilation.

Internal amenity

- 7.9.3 All units proposed as part of this development exceed the minimum floor space standards, this as well as other matters is discussed further below:

Main house

- 7.9.4 Flats are proposed over 3 floors. The only lighting to the x3 basement units would be through new or extended light wells. Units would therefore not benefit from any outlook and lighting through such wells can be limited. This is of particular concern for the one bedroom unit where the only light well is located to the northern elevation, thereby limiting sunlight. However, these basement units (and indeed most of the flats) are of generous size. For instance, the one bedroom unit has a floor area of some 62 sqm, well above the minimum standards of 50 sqm. The x2 two bedroom units are 167 sqm and 100sqm respectively, where the minimum floor space standards is 70 and 61 sqm respectively.
- 7.9.5 In terms of the ground floor arrangement, some of these units would be single aspect or have secondary aspect over the internal communal court yards. This would limit the privacy these from such windows. However, as with the basement layout, flats are of generous floorspace. All units well exceed the minimum standards by at least 10sqm and in some cases twice that area. It is also noted that all ground floor units benefit from their own front doors, creating a sense of ownership for these units.
- 7.9.6 Similar compromises exist at the upper floors. Whilst all upper floor units are dual aspect, the built form of the building would limit the level of day/ sun lighting and the outlook afforded to a number of the units habitable room windows. There is also a potential for some degree of inter overlooking with units. However, in all instances the proposed floorspace are generous and far exceeds that of the minimum standards.
- 7.9.7 There are some internal “stacking” concerns where bedrooms would be above/ below other units living rooms/ bathrooms which could create potential conflict of noise. However, it is recognised that the irregular layout of the listed building will limit the ability to replicate the floorplan on each level. The need to retain the historic proportions of the building is also a consideration/ constraint of layout.

Coach House, Pavilion and Gate House units

- 7.9.8 These proposed new dwellings provide suitable internal floorspace for dwellings of this size, in excess of the relevant space standards. All units are dual aspect and habitable rooms would afford suitable levels of sun/daylight, outlook, and ventilation.
- 7.9.9 Overall, whilst there are some concerns about the level of amenity afforded to all units, it is recognised that when converting a listed building some flexibility is necessary. Taking this into account, the generous floorspace standards for each unit and moreover the wider setting the development would provide, it is considered that each of the proposed units contained within the converted building would provide a suitable residential environment.

External amenity

- 7.9.10 In terms of external space, all new houses and flats are expected to have access to usable outdoor space, be it private or communal. The indicative landscape strategy demonstrates how, through the careful use of hard and soft landscaping, the houses and ground floor units will all be afforded areas of amenity space which residents can take ownership of. In addition, and specifically for the upper floor units in the main house, the development, as a whole, is set within the wider grounds of the listed buildings. Overall, the proposal provides a good level of external amenity space for all future occupiers.

7.10 **Environmental Considerations**

Flooding and Sustainable Urban Drainage

- 7.10.1 The site would be within flood zone 1, defined at less than 0.1% chance of flooding in any year. For a scheme of this size a Flood Risk Assessment (FRA) is required. The purpose of the FRA is to demonstrate that the proposal will not be in an area at risk of flooding and ensure that flood risk is not increased elsewhere.
- 7.10.2 An FRA prepared by Infrastruct CS Ltd dated 21.09.2020 has been submitted in support of this planning application. Whilst this document does not accurately describe the proposed development (it omits the proposed Pavilion) it is shown on the supporting plans and does suitably identify potential sources of flooding. The FRA also sets out that any risk of flooding to this site would be low.
- 7.10.3 The potential increase to flooding from a development of this nature could be through any increase in impermeable areas, and the resultant increased risk of causing rapid surface water runoff to watercourses and sewers, thereby causing surcharging and potential flooding. There is also the potential for pollutants to be mobilised and consequently flushed into the receiving surface water system. Such matters need to be considered through managing sustainable drainage.
- 7.10.4 In accordance with The Flood and Water Management Act 2010 the Surrey County Council in its role as Lead Local Flood Authority (LLFA), is a statutory consultee for all major applications. In addition to the above Paragraph 169 of NPPF (2021) states that all 'major' planning applications must incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. SuDS must be properly designed to ensure that the maintenance and operation costs are proportionate and sustainable for the lifetime of the development. Section 7 and 8 of the aforementioned FRA deals with the proposed drainage strategy for this site. Some of the measures proposed include appropriately sized cellular soakaways, utilising side hung impermeable roads falling into swales, permeable paved surfaces and upgrading the drainage at the access to the road (which currently does not benefits from any drainage).
- 7.10.5 The Country Council in their role as the LLFA have advised that the proposed drainage scheme meets the relevant requirements and further matters can be dealt with by way of condition. It is therefore considered that the proposal will not be in an area at risk of flooding and suitable measures can be secured by way of recommended condition 12 and 16 to ensure that flood risk is not increased elsewhere.

Renewable & Low Carbon Energy

- 7.10.6 New development is expected to demonstrate how it has incorporated sustainable principles into the development including; construction techniques, renewable energy, green infrastructure and carbon reduction technologies.

- 7.10.7 Policy SD8: Renewable and Low Carbon Energy sets out that new development will be expected to demonstrate how the proposal follows the energy hierarchy (Be lean; use less energy, be clean; supply energy efficiently and be green; use renewable energy). For a scheme of this scale, it is also expected for the development to incorporate measures to supply a minimum of 10% of the development's energy needs from renewable and/or low carbon technologies.
- 7.10.8 The NPPF (2021) paragraph 155 states that in determining planning applications developments should comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicants, having regard to the type of development involved and its design, that this is not feasible or viable.
- 7.10.9 An Energy Assessment prepared by QODA dated 10.09.2020 has been submitted in support of this planning application. The overall conclusion of this report is that the energy hierarchy has been followed and it is proposed for the development to incorporate air source heat pumps to the proposed new dwellings. It is noted that this document has several discrepancies – referring to the correct number of units in the executive summary, less units in the description. However, the methodology does seek to demonstrate, based on the sample of units, that the requirements of this policy can be achieved. It is considered that further details and compliance can be dealt with by conditions, this is recommended in **condition 15**.

Impact on Ecology and Biodiversity Considerations

- 7.10.10 Policy EE9 of the Local Plan deals with Biodiversity and sets out that development proposals should demonstrate net gains in biodiversity. The Council have prepared further guidance on this, contained within the Green and Blue Infrastructure SPD. The latter which has been published since the application has been submitted.
- 7.10.11 Paragraph 174 of the NPPF (2021) seeks development to provide net gains for, biodiversity. Paragraph 180 of the NPPF (2021) states that:
- “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused...”*
- 7.10.12 A Preliminary Ecological Appraisal prepared by ADAS and indicative landscape strategy have both been submitted in support of this planning application. The conclusion of the former report sets out that the majority of the habitats were assessed to be of low ecological value, with the exception of the broadleaved semi-natural woodland which is a Habitat of Principal Importance. The main ecological impacts will be to the existing buildings with potential to support roosting bats and disturbance to nesting birds. In addition, the semi-improved grassland has potential to support common reptiles, other vegetation including woodland and scrub have potential to support nesting birds with mature trees containing potential roost features for bats. It is considered that the findings and proposed recommendations acceptable and can be dealt with by way of condition, as per the recommendation of Surrey Wildlife Trust (see recommended condition 6).
- 7.10.13 The Appraisal also made recommendations to ensure that the development enhances the site's biodiversity post-development through the provision of bird and bat boxes, native planting of fruit/seed bearing species and creating invertebrate habitat.
- 7.10.14 Surrey Wildlife Trust recommends that prior to determination, the Council should require

the applicant to provide an appropriately detailed document to demonstrate that a measurable net gain, secure for the lifetime of the development, will be achieved. However, Officers consider that a level of pragmatism can be applied. Given the size of the site and the ability for biodiversity net gains delivered across this wider area it is considered appropriate and reasonable in this instance for further details to be secured by way of condition, as set out in recommended condition 14.

Contaminated Land

- 7.10.15 Policy EE2 seeks, where relevant, contaminated land surveys are to be submitted as part of applications to determine the source of any pollutants and any remedial measures necessary. Paragraphs 174 and 183 of the NPPF (2021) seek to ensure that through decision making that suitable land remediation is secured through redevelopment.
- 7.10.16 A Land Contamination Assessment prepared by engineers HRW and dated September 2020 has been submitted in support of this application. The overall conclusions of this assessment are that there is a requirement for remediation of soils only in one specific area.
- 7.10.17 The Council's Contaminated Land Officer has confirmed that subject to contaminated land conditions (set out in recommended **condition 10**) the proposed development would provide suitable remediation.

7.11 **Other Considerations**

Impact on Neighbouring Amenity

- 7.11.1 Matters regarding the agents of change principle have been considered above. Beyond this, the development is contained within large and substantive grounds. The nearest residential units are by Holloway Hill. Given the separation distances the proposal will not affect the amenities of occupiers of any nearby residential properties in terms of loss of light, overbearing impact or raise any issues in terms of privacy/ overlooking.
- 7.11.2 It is not considered that the activities associated with the development would result in noise and disturbance which would give rise to amenity issues.

Infrastructure Considerations

Thames Basin Heaths Special Protection Area

- 7.11.3 The site lies within 5km of the Thames Basin Heaths Special Protection Area (TBHSPA). In accordance with guidance from Natural England, the Habitats Regulations Assessment requirements are that plans or projects which may have a likely significant effect on a European designated site (such as the TBHSPA) can only proceed if the competent authority is convinced, they will not have an adverse effect on the integrity of the European site.
- 7.11.4 Any net increase in residential dwellings within 5km of the SPA is likely to have a significant adverse effect on the SPA either alone or in combination with other plans or projects. Consequently, every proposal for net additional dwellings must make provision to avoid and mitigate the effect.
- 7.11.5 As competent authority the Council's appropriate assessment is that the contributions in line with the agreed strategy with Natural England, means harm to protected species can be avoided and mitigated by the provision of SANGs. The Council has available capacity

to accommodate this development subject to appropriate payments for delivery and maintenance. Subject to securing these SANG contributions by way of a s106 agreement it is considered that the proposal would address the impacts arising from the development on the Thames Basin Heath Special Protection Area in accordance with the Council's policies and the NPPF.

- 7.11.6 The second part is towards the Strategic Access Management and Monitoring funds which enable the coordinated visitor management across the whole of the publicly accessible TBHSPA. The funds are used in part to survey the Thames Basin Heaths' Authorities SANGs. The purpose is to identify any improvements to the SANG.
- 7.11.7 In accordance with the Council adopted SPD for this area a financial contribution of £44,271.5 is required towards SANG and a further £17,640 towards SAMM towards the avoidance/ mitigation strategy is necessary. The applicants has submitted a unilateral undertaking in accordance with this to secure such provision. At the time of writing the UU is currently with the council's legal team for review.

Management and maintenance of the site

- 7.11.8 It is understood the developer will set up a freeholder management association to manage the repair and maintenance of the external fabric of the main house, stable block, common parts and the grounds. Each dwelling will be sold with a share of the freehold and owners will be directors of the freeholder management association. Much of this extends beyond the remit of planning however as part of recommended conditions regarding landscaping further details are requested regarding its management to ensure the landscaping and biodiversity net gains are delivered for the duration of the development.

Community Infrastructure Levy

- 7.11.9 In line with the Council's Charging Schedule the proposed development would now be liable for the Community Infrastructure Levy (CIL). The applicant has submitted the required forms including the assumption of liability for payment on the net increase in gross internal floor space
- 7.11.10 CIL acts as a "pool" of contributions from which the Council is able to fund infrastructure necessary to support the borough, as a whole. This includes matters such as the provision of education or health provision, or indeed any other infrastructure requirements. The site is liable for the CIL at a rate of £300 per square metre of net floor space (plus any indexation).

8. Assessment for Very Special Circumstances

- 8.1 The harm identified in the above assessment is that the proposed development constitutes inappropriate development within the Green Belt. This is given substantial weight.
- 8.2 The other harm identified is summarised as follows:
- Impact on the visual openness of the Green Belt (moderate harm)
 - An unsustainable form of development (limited to moderate harm)
- 8.3 The Green Belt balancing exercise therefore needs to be if 'other considerations' put forward as part of this planning application equate to Very Special Circumstances (VSC) which exists to outweigh the harm and any other harm. This harm includes the inappropriate development in the Green Belt, the impact on openness; the impact on the character of the area.

- 8.4 The applicants have submitted a Green Belt Statement and Very Special Circumstance Report prepared by Savills and dated Nov 2020. Section 6 of the report sets out their Very Special Circumstance case.
- 8.5 The report summarises their case as being:
1. Utilising PDL within the Green Belt;
 2. Securing a new use for the existing listed building which has been vacant and fallen into a state of disrepair;
 3. Preservation of existing trees and additional planting to improve the contribution to the wider landscape;
 4. Refurbishment of the grounds and significant enhancements to the setting of the Listed Building;
 5. Contribution to the housing land supply position in Runnymede Borough;
 6. Enhancement of existing ecological habitats on the site and securing a net gain in biodiversity.

Each matter will be considered in turn:

Utilising PDL within the Green Belt

- 8.6 The submission sets out that the proposal, is wholly Previously Developed Land. Further reference is made to contributing towards brownfield development and effective and efficient use of such land, referring to both national and local policy.
- 8.7 Were this site to be considered to fall within such a definition the NPPF (2021) is clear that the presumption in favour of such development is only relevant where it would not conflict with other policies in this Framework. As the proposed development represents inappropriate development in the Green Belt this is not a relevant consideration. Officers struggle to understand the justification being advocated in this regard. Accordingly, **Officers give limited to no weight to this as a Very Special Circumstances.**

Securing a new use for the existing listed building which has been vacant and fallen into a state of disrepair

- 8.8 The application submission highlights that integral to the development is the proposal to renovate and re-landscape the grounds to provide a sympathetic and appropriate new landscape fit for the new residential use. The submission contends that in order to make the scheme viable, it was assessed that 5 x new build dwellings is sufficient to produce a positive land value for the risks involved. This number of dwellings would produce an expected 16% profit on GDV. Which whilst far lower than the expected level of return for such a risky endeavour, site constraints and other issues have warranted that this level of reduced return is enough to warrant the risk (given the significant capital expenditure and holding costs incurred thus far).
- 8.9 Officers recognise that the building is currently in a poor state and significant works are necessary in order to bring to the building back into viable use. It is also recognised that the vandalism and deterioration of the buildings is not the fault of the applicant and that they have made considerable efforts to secure the building.
- 8.10 Furthermore, the above assessment gives strong support to bringing the building back to the viable use and that without the “enabling development” the proposed development would result in a deficit of circa £1.8 million. With such a large deficit it is highly unlikely that the scheme to simply convert and extend the building would ever come forward and the building would then fall into further disrepair.

- 8.11 The proposed new dwellings within the grounds have been amended since the initial submission. These are considered to preserve the setting of the Listed Building.
- 8.12 Overall and given the strong presumption in favour of bringing the Grade II Listed Building back to viable use, which can be secured through the legal agreement prior to the commencement of the new development it is considered **that substantial weight as very special circumstances can be given to this proposal bringing forward the viable and comprehensive landscape led redevelopment of this site.**
- 8.13 As part of this it is recognised that the submitted proposes the reinstatement of a number of historical features, including the balustraded parapet to all those locations from which the original was removed and the various chimneystacks that have been truncated will be reinstated to their original proportions. These are considered to be key benefits forming part of the wider restoration works

Preservation of existing trees and additional planting to improve the contribution to the wider landscape;

- 8.14 The submission seeks to argue that there is a significant opportunity to improve the Arboricultural setting of Silverlands through the management of the existing tree stock and diversification of the tree species and that without the scheme coming forward this would not be possible.
- 8.15 Officers are unsure of the basis in which such a justification can be made that this should form part of an “other consideration” which forms part of Very Special Circumstances. This would be “double counting”. The case about how this scheme brings forward a comprehensive redevelopment of this site, as a whole, which includes landscaping, as well as managing the trees is already discussed above and has been given the appropriate weight. Such matters should be divided into separate discreet points.
- 8.16 This manner in trying to sub divide what forms part of a wider and comprehensive argument, which has already been advanced above is not one which Officers endorse in any manner. In this context **Officers give limited weight to this as a Very Special Circumstances.**

Refurbishment of the grounds and significant enhancements to the setting of the Listed Building

- 8.17 The submission seeks to argue that there is a significant opportunity to enhance the existing degraded setting of the building, reinstating a more appropriately landscaped setting consistent with its period, style and status, including clearing overgrown vegetation to uncover surviving elements of historic layout; applying new high quality surfacing to the drive, parking areas and pedestrian approaches to the listed building; and retaining, introducing and managing tree and other planting as appropriate.
- 8.18 As above, the case about how this scheme brings forward a comprehensive redevelopment of this site, as whole, which includes landscaping is already discussed above. **Limited weight to this as a Very Special Circumstances.**

Contribution to the housing land supply position in Runnymede Borough;

- 8.19 The Government is clear that the supply of housing can be a material consideration which contributes towards a case of Very Special Circumstances but cannot be of sufficient weight on its own to clearly outweigh harm to the Green Belt, in principle.
- 8.20 Since the developer has submitted their Green Belt statement the Council have now updated their housing land supply position to demonstrate we have in excess of five-year housing land supply. Irrespective, it is recognised that this scheme would contribute towards additional homes in the Borough, albeit a limited one. In this context **Officers give limited**

weight to this as a Very Special Circumstances.

Enhancement of existing ecological habitats on the site and securing a net gain in biodiversity

- 8.21 The applicants statement sets out that, the proposal will enhance the sites biodiversity post development and provide an environmental net gain. Measures include the provision of bat and bird boxes, native planting of fruit/seed bearing plants and creating habitat for invertebrate.
- 8.22 Such requirements are expected as part of any planning application to ensure an acceptable scheme. Were this not proposed the scheme could be refused. **Limited weight is given to this as a benefit to forming Very Special Circumstances.**

Conclusion on Very Special Circumstances Case

- 8.23 The NPPF (2021) states that very special circumstances will not exist unless the harm to the Green Belt, and any other harm, is '*clearly outweighed by other considerations.*' The decision-taker must exercise a qualitative judgment and ask whether the circumstances, taken together, are very special and clearly outweigh the harm.
- 8.24 Limited weight is given to a number of the matters advocated in the above supporting statement. However, substantial weight is given to the ability for this scheme, when considered as a whole, to bring the site back into viable use in the long term through repairing, restoring, and managing the Grade II Listed Building and its wider grounds. It is further recognised that through this scheme the proposed development would preserve the Grade II Listed Building.
- 8.25 It is considered that its is this justification which equates to very special circumstances which **clearly** outweighs the harm to the Green Belt as set out in this report as well as the other harm identified above.

9. EQUALITY AND HUMAN RIGHTS CONSIDERATIONS

- 9.1 Consideration has been given to Articles 1 and 8 of the First Protocol of the European Convention on Human Rights. It is not considered that the decision would result in a violation of any person's rights under the Convention.
- a) Consideration has been given to s149 of the Equality Act 2010 (as amended), which has imposes a public sector equality duty that requires a public authority in the exercise of its functions to have due regard to the need to:
 - b) Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
 - c) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - d) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

It is considered that the decision would have regard to this duty.

10. CONCLUSIONS

- 10.1 In summary, the principle of the development represents inappropriate development in the Green Belt. However, it is considered that very special circumstances exist, in this case the ability for this redevelopment to repair, restore and bring the existing grade II Listed Building back into use which clearly outweighs the harm to the Green Belt and any further identified harm set out in section 8 of this report. Furthermore the legal agreement will ensure that the restoration works are carried out prior to commencement of the new housing.
- 10.2 The proposed development is also considered to provide a suitable housing mix given the nature and location of the development. It is also recognised that the proposal would deliver some economic benefit. These are given moderate weight as benefits of the proposal. The proposal would also provide additional housing, recognising the council's current housing land supply position as detailed above, this too is given some weight as a benefit of the proposal.
- 10.3 The proposal would preserve the Listed Building and would ensure the long-term preservation of the building. This is considered to be a substantial benefit of the proposed development. In wider visual terms the proposal scheme is considered acceptable.
- 10.4 It is considered the application site is in a relatively unsustainable location which is considered to result in limited harm. The proposal does not raise any issues in terms of highway safety and or capacity. The proposal also provides suitable parking for the development and whilst it's noted that this would be above and beyond the recommended maximum standards given the site location this is considered to be justified.
- 10.5 The proposed development is not considered to raise any significant issues in terms of the amenities of the occupiers of surrounding units, including in terms of conflict of noise with the adjoining commercial businesses. The proposed development provides a suitable residential environment for future occupiers.
- 10.6 In terms of environmental considerations, the proposed development is considered to be acceptable with regard to flood risk and subject to conditions would provide suitable urban drainage. The proposal will provide suitable renewable and low carbon energy and subject to conditions would have a suitable relationship in terms of ecology and biodiversity. Contaminated land matters can be dealt with by a condition.
- 10.7 The relevant infrastructure provisions are also secured by way of planning obligation and/or conditions as necessary.
- 10.8 When applying the planning balance, it is considered that any harm caused from the proposed development; is outweighed by the benefits of the scheme. Accordingly, the application is recommended for approval subject to the following:

11. FORMAL OFFICER RECOMMENDATION

The CHDMBC be authorised to grant planning permission subject to the completion of a unilateral undertaking under the Town and Country Planning Act 1990 (as amended) to secure the following obligations:

A financial contribution of £44,271.5 is required towards SANG and a further £17,640 towards SAMM towards the Thames Basin Health Special Protection Area Avoidance/mitigation strategy

And the subject to the following planning conditions:

1. Standard three year time limit

The development for which planning permission is hereby granted must be commenced no later than the expiration of three years beginning with the date of this permission.

Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004.

2. Approved plans

The development hereby permitted shall not be carried out except in complete accordance with the approved the drawings as set out in the submitted "planning/listed Building Consent documents" ref 17/035/3.0/CW issue date 25.03.2022 and received by the Local Planning Authority on 25.03.2022

Reason: To ensure high quality design and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance in the NPPF.

3. Implementation plan

The development shall be undertaken in accordance with the Proposed Site Plan- phasing (as set out in condition 2- approved plans) and the Delivery Programme Rev- PL dated 28 February 2022 or such other update document as submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure this phase/ parcel of redevelopment is undertaken in a suitable manner in order to secure the Very Special Circumstances and to comply with Policy EE1, EE3, EE4 and EE14 of the Runnymede 2030 Local Plan and guidance within the NPPF.

4. Removal of Permitted Development rights (Classes' A, B, D, E, F)

Notwithstanding the provisions of Classes A, B, D, E and F of Schedule 2, Part 1 and of the Town and Country Planning (General Permitted Development) Order 2015 (as amended), or any orders amending or re-enacting that Order with or without modification, no development following within the descriptions of Classes A, B, D, E and F shall be constructed or carried out to the dwelling houses hereby approved, without the prior written permission of the Local Planning Authority.

Reason: To ensure the openness of the Green Belt is protected and to ensure an acceptable form of development to and within the grounds of a Listed Building and to comply with Policy EE1, EE3, EE4 and EE14 of the Runnymede 2030 Local Plan and guidance within the NPPF.

5. Construction Transport Management Plan

Prior to commencement of any development (including demolition) a Construction Transport Management Plan, to include details of:

- (a) parking for vehicles of site personnel, operatives and visitors
- (b) loading and unloading of plant and materials
- (c) storage of plant and materials
- (d) programme of works (including measures for traffic management)
- (e) provision of boundary hoarding behind any visibility zones
- (f) measures to prevent the deposit of materials on the highway
- (g) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
- (h) on-site turning for construction vehicles

Shall be submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved details for construction of the development.

Reason: in the interest of highway safety and to satisfy the Runnymede Local Plan (2030) policies Policy SD3: Active & Sustainable Travel, Policy SD4: Highway Design Considerations, Policy SD5: Infrastructure Provision & Timing, Policy SD7: Sustainable Design.

6. Construction and Environment Management Plan

Prior to commencement of any development (including demolition), a Construction and Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority.

This document shall detail how protected habitats and species, including woodland features will be protected from any adverse impacts as a result of construction. The CEMP should include adequate details including:

- a) Risk assessment of potentially damaging construction activities
- b) Practical measures to avoid and reduce impacts during construction
- c) Location and timing of works to avoid harm to biodiversity features
- d) Responsible persons and line of communication
- e) Use of protected fences, exclusion barriers and warning signs.

The development shall be undertaken in accordance with the approved details for construction of the development.

Reason: In the interest of protecting potential ecological value and species in the site as required by policy EE9 of the Local Plan

7. Tree Protection

Prior to commencement of any development (including demolition), and before any equipment, machinery or materials are brought on to the site, a revised tree protection plan (TPP) shall be submitted to and approved in writing by the local planning authority. The TPP shall be in accordance with BS5837:2012 - Trees in relation to design, demolition and construction, and shall show the approved layout. The protection shown on the plan shall be installed in strict accordance with the details of the submitted arboricultural method statement (AMS)

Reason: To ensure the retention of trees in the interests of the visual amenities of the area and to accord with Policy EE11 of the Local Plan.

8. Materials

- A. Prior to commencement, excluding site clearance, demolition and any internal structural repairs required to the main house, a detailed schedule and specification of the materials and finishes to be used (on a phased basis or otherwise) shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:
- Brickwork (including bonding and mortar);
 - Cladding;
 - Windows and doors (including reveals and frames);
 - Soffits (as relevant);
 - Balconies and privacy screens (as relevant);
 - External guttering;
 - Roofing tiles;
 - Boundary treatments
 - Details of all rooftop structures including flues, satellite dishes, plant, lift overruns, cleaning cradles (as relevant);
 - Plant enclosures (as relevant)

Sample boards constructed on site showing the above as relevant shall be provided at the same time as an application is made.

- B. The development shall be carried out and retained in accordance with the approved details.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of amenity of the Grade II Listed Building and to comply with Policy EE1, EE3 and EE4 of the Runnymede 2030 Local Plan and guidance within the NPPF.

9. Bat Mitigation

The development shall be undertaken in accordance with the recommendations set out the Method Statement based on the mitigation, compensation and enhancement actions presented within 5 Recommendations section of the Protected (Bat & Reptile) Species Survey Report received by the Local Planning Authority on the 23.11.2020.

Reason: To enhance the biodiversity of the site and protected species and to comply with Policies EE9, EE11 and EE12 of the Runnymede 2030 Local Plan and guidance within the NPPF.

10. Contaminated Land

- A. Prior to commencement of any development forming “Phase 2 – Below ground services, drive and parking courts and subbases” a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been submitted to and approved in writing by the local planning authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, an appraisal and remedial options, proposal of the preferred option(s), a timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land

under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

- B. If found to be required, the remediation scheme shall be implemented in accordance with the approved timetable of works. Upon completion of measures identified in the approved remediation scheme, a verification report (validation report) that demonstrates the effectiveness of the remediation carried out must be submitted to the local planning authority.
- C. In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it must be reported in writing immediately to the local planning authority and once the Local Planning Authority has identified the part of the site affected by the unexpected contamination, development must be halted on that part of the site.
- D. An assessment must be undertaken in accordance with the requirements of Condition (A) or otherwise agreed and where remediation is necessary, a remediation scheme, together with a timetable for its implementation must be submitted to and approved in writing by the Local Planning Authority in accordance with the requirements of Condition (B) in the form of a Remediation Strategy which follows the .gov.uk LCRM approach. The measures in the approved remediation scheme must then be implemented in accordance with the approved timetable. Following completion of measures identified in the approved remediation scheme, a validation (verification) plan and report must be submitted to and approved in writing by the Local Planning Authority in accordance with Condition.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with guidance in the NPPF.

11. Archaeological work

Prior to commencement of any development forming “Phase 2 – Below ground services, drive and parking courts and sub bases” the applicant shall secure the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority. The development will be undertaken in accordance with any approved details.

Reason: To the interests of the archaeological potential and to comply with Policy EE3 and EE6 of the Runnymede 2030 Local Plan and guidance within the NPPF.

12. Surface water drainage scheme

Prior to commencement of any development forming “Phase 2 – Below ground services, drive and parking courts and sub bases” details of the design of a surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design must satisfy the SuDS Hierarchy and

be compliant with the national NonStatutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

- a) Detailed drainage design drawings and calculations to include: a finalised drainage layout that follows the principles set out in the approved drainage strategy detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
- b) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site.

13. Landscaping

Notwithstanding the approved plans or any indication given otherwise, prior to commencement of any development forming “Phase 2 – Below ground services, drive and parking courts and sub bases” full details of hard and soft landscaping scheme (including any boundary treatments) and details of means of access to the communal amenity areas for occupants of the development (including people who require level access and wheelchair users) shall be submitted to and approved in writing by the Local Planning Authority.

This shall include a ‘schedule of undertaking’ the proposed works and samples of all hard surfacing, as well as a plan for the long terms management of the communal areas.

All approved landscaping details shall be undertaken and completed in accordance with the approved ‘schedule of undertaking.’

All approved landscaping works shall be retained in accordance with the approved details. If within a period of five years from the date of planting of any tree or shrub shown on the approved landscaping plan, that tree or shrub, or any tree or shrub planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes seriously damaged or defective, another tree or shrub of the same species and size as that originally planted shall be planted in the immediate vicinity, unless the Local Planning Authority gives its prior written permission to any variation.

Reason: To ensure the development is adequately landscaped and to comply with Policy EE1, EE3, EE4 and EE14 of the Runnymede 2030 Local Plan and guidance within the NPPF.

14. Biodiversity net gain

Notwithstanding the approved plans or any indication given otherwise, prior to commencement of any development forming “Phase 2 – Below ground services, drive and parking courts and subbases” full details of biodiversity net gains presented within 5.2 section of the Preliminary Ecological Appraisal received by the Local Planning Authority on the 23.11.2020 shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To enhance the biodiversity of the site and protected species and to comply with Policies EE9, EE11 and EE12 of the Runnymede 2030 Local Plan and guidance within the NPPF.

15. Renewable & Low Carbon Energy

Prior to commencement of any development forming “Phase 2 – Below ground services, drive and parking courts and sub bases”, full details of measures to incorporate sustainable design and CO2 reduction measures shall be submitted to and approved in writing by the Local Planning Authority. This should be based on the Energy Assessment prepared by QODA dated 10.09.2020 or such other details as agreed in writing by the Local Planning Authority. The development shall thereafter be undertaken in accordance with the approved details and maintained thereafter.

Reason: To ensure sustainable measures are incorporated into the development and to comply with Policy SD8 of the Runnymede 2030 Local Plan and guidance within the NPPF.

16. Drainage verification

Prior to the occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).

Reason: To ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SuDS.

17. Access

Prior to occupation, the proposed modified access to Holloway Hill shall be constructed and provided with visibility zones in accordance with the approved plans (condition 2) and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1000mm high.

Reason: in the interest of highway safety and to satisfy the Runnymede Local Plan (2030) policies Policy SD3: Active & Sustainable Travel, Policy SD4: Highway Design Considerations, Policy SD5: Infrastructure Provision & Timing, Policy SD7: Sustainable Design.

18. Vehicle parking

Prior to occupation (on a phased basis or otherwise), the car parking spaces shall be laid out within the site in accordance with the approved plans (condition 2), and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.

Reason: in the interest of highway safety and to satisfy the Runnymede Local Plan (2030) policies Policy SD3: Active & Sustainable Travel, Policy SD4:

Highway Design Considerations, Policy SD5: Infrastructure Provision & Timing, Policy SD7: Sustainable Design.

19. EVC Charging points

Prior to the occupation of the development, details of the proposed electric vehicle charging points (EVCPs), as shown on the approved plans, including details of how they will be managed, shall be submitted to and approved in writing by the Local Planning Authority. The approved EVCPs, consisting of 20% active and 80% passive charging points, shall be installed prior to occupation and shall be maintained in accordance with the approved details thereafter.

Such Electric Vehicle Charging point shall have a fast charge socket (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply).

Reason: in the interest of sustainable development and to satisfy the Runnymede Local Plan (2030) policies Policy SD3: Active & Sustainable Travel, Policy SD4: Highway Design Considerations, Policy SD5: Infrastructure Provision & Timing, Policy SD7: Sustainable Design.

20. Cycle parking

Notwithstanding the approved plans, prior to any occupation, full details of all cycle parking including locking/storage provision shall be submitted to and approved in writing by the Local Planning Authority. The approved arrangements shall be provided before any part of the development is first occupied and shall be permanently maintained thereafter.

Reason: In order to provide adequate bicycle parking and mobility scooter facilities at the site in the interest of reducing reliance on private car travel and ownership.

21. Refuse and recycling

Prior to occupation (on a phased basis or otherwise) details of the relevant refuse and recycling facilities further details of the lighting and access to the enclosure shall be submitted to and approved in writing by the Local Planning Authority. The approved arrangements shall be provided before any part of the development is first occupied and shall be permanently maintained thereafter.

Reason: To ensure a satisfactory standard of development as required by policy EE1 of the Local Plan.

Recommended Informatives:

1. CIL liability
The applicant is aware that the scheme is CIL liable upon commencement of the development.
2. Discharge of conditions application
The applicant(s) are advised that formal agreement with the Local Planning Authority can only be undertaken through an application for the discharge of conditions application. A decision on such applications can take up to 8 weeks. Such timeframes should be taken into account as part of the construction

process. This will be longer if applicant(s) wish to submit additional information and/or revisions amendments to overcome issues and concerns raised. The Local Planning Authority will expect agreements to extend the timeframe to consider discharge of conditions application where an applicant wishes to submit additional information and/or revisions amendments. Early engagement and pre-application discussions is encouraged to prevent lengthy delays.

3. Works to the Highway

The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/floodingadvice.

4. Mud/debris on the highway

The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149). 3) Accommodation works The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.

5. Damage to the highway

Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.

6. Statutory utility works

The developer would be expected to agree a programme of implementation of all necessary statutory utility works associated with the development, including liaison between Surrey County Council Streetworks Team, the relevant Utility Companies and the Developer to ensure that where possible the works take the route of least disruption and occurs at least disruptive times to highway users.

7. Landscaping

With reference to condition 13 (landscaping) details submitted need to include: a full tree planting plan including detail of planting and schedules, details of irrigation system within the site, including ground type of watering points.

Hard landscaping plans will include complete paving specification or various pavement elements, including thickness, colour etc.
Material samples should be provided as part of the condition
The landscaping proposal need to include reference to the suds/ drainage details

8. Biodiversity

With reference to condition 14 (biodiversity) details submitted need to include details of bat and bird boxes (suitable for swifts) and wildlife friendly planting, this will need to have regards for the details submitted to dela with landscaping.

9. Electric vehicle charging

With reference to condition 19 (EVC charging points) It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to: <http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html> for guidance and further information on charging modes and connector types.

With regards to the active points, the proposed method of payment for users should be specified. Additionally, the applicant will need to set out details of how EVCP's will be managed and maintained to meet the needs of intended users. The applicant should also address how parking spaces with EVCP's will be restricted for use by electric vehicles, when and how maintenance of EVCP will be carried out, and what procedures will be put in place to monitor EVCP use and trigger conversion of parking spaces from 'passive' to 'active' EVCP's.

Information regarding EV charging provision, capacity and future-proofing cabling/ducting, including opportunities for network upgrades to accommodate increased demand, should also be provided.

With regards to the passive charging points, a ground level cap should be installed at each location to indicate the location of the cables. It is sometimes necessary to ensure that the passive charge points have their own separate distribution boards.

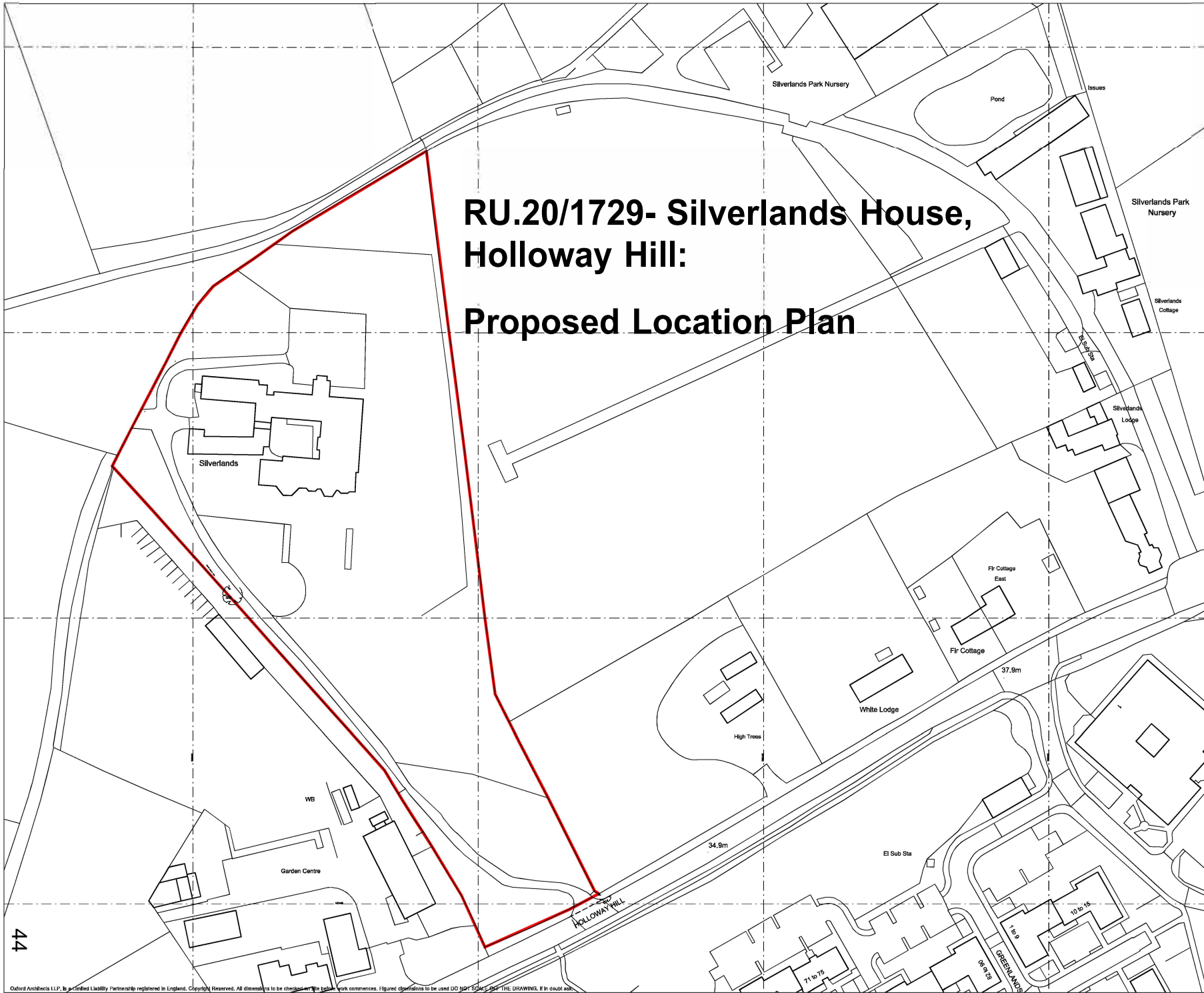
10. Refuse and recycling stores

With reference to condition 21 (refuse and recycling stores) details submitted need to demonstrate that each bin store needs to be able to fit at least 2-3 1100L bulk bins with room for the bins to be pulled out. The stores need to be well lit, with doors that open outwards and are sturdy enough to hold themselves open They need to have a dropped curve or flat surface for the bins to be pulled out There must be enough room for a turning point for the vehicle.



0 40m
1:1250 @ A3

RU.20/1729- Silverlands House, Holloway Hill: Proposed Location Plan



Rev	Description	Date
Partner CW	Drawn DG	Date Jan 2016

Project
Silverlands

Title
Site Location

Drawing Reference
17035-OA-XX-01-P-00

Drawing No 01	Revision	Status
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Scale
1:1250 @ A3

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- Key**
- Gas pipeline
 - Tree removed
 - Electric car charging point
 - Bin & bike storage

RU.20/1729- Silverlands House, Holloway Hill:

Proposed Site Plan



M	Gatehouses & pavilion amended	25/09/22
L	Planning layout adjustments in line with planners comments	23/06/21
K	Gatehouse roof plans amended to reflect latest proposed plans	08/10/20
J	Finalist not used. Gatehouse and Pavilion roof plans amended to reflect latest proposed plans	09/10/20
H	Tree removed amended	15/09/20
G	Bin & bike storage line amended according to the client's requirements	04/09/20
F	Finalists following pre-app meeting	21/08/19
D	Initial amendments	29/01/19
C	Pavilion and gatehouse 2 added	19/01/18
B	Lodges added and plans revised	10/01/17
A	Lodges revised final plan	12/12/17
Rev	Drawn	Date
	CW	DD
		June 2017

Project: **Silverlands**

Title: **Proposed Site Plan**

Drawn/Reference: **17035-OA-XX-87-P-00**

Drawing No: 87	Revision: M	Status: ISO
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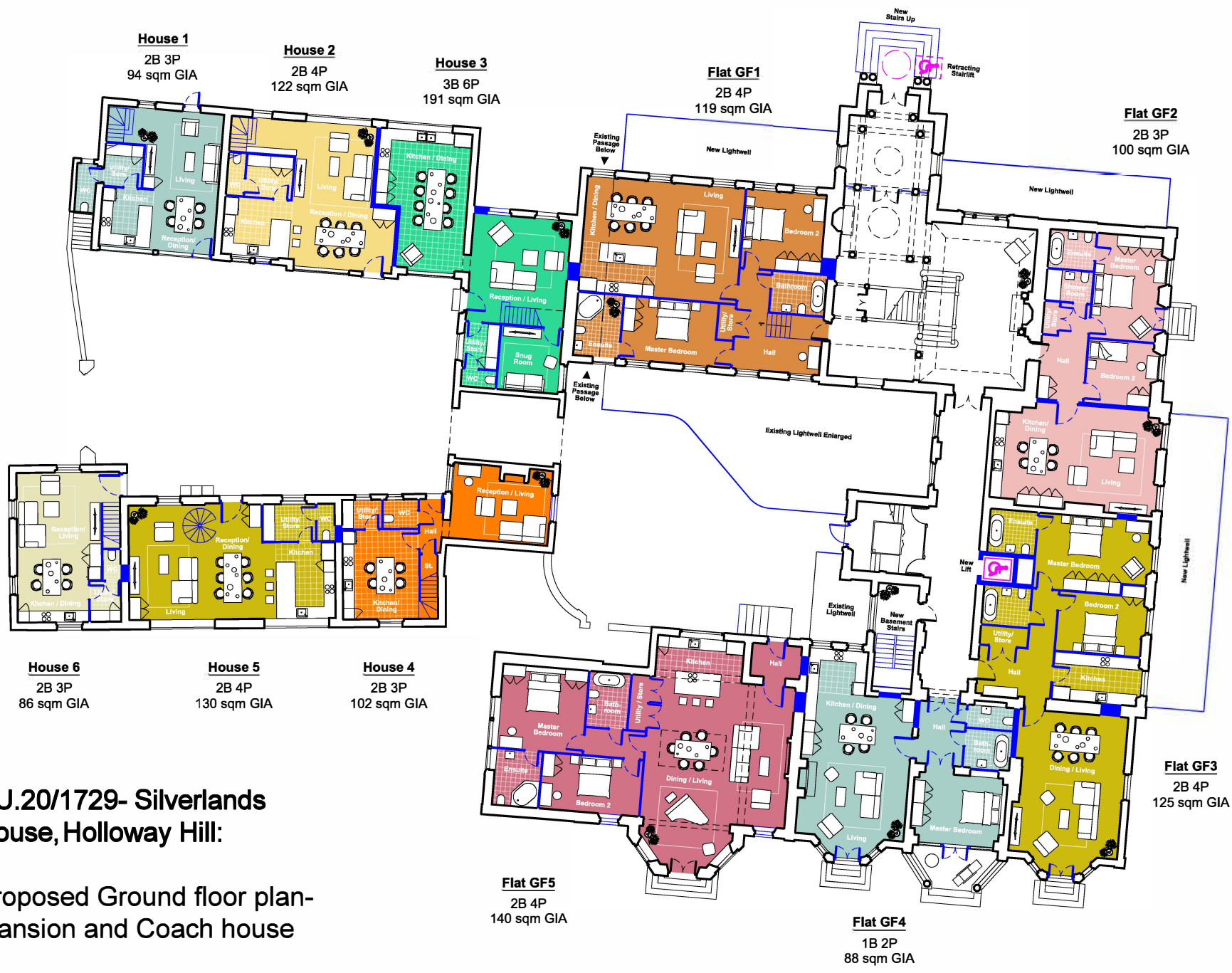
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OXFORD ARCHITECTS

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Key

- Existing elements to be retained
- Doors to be retained
- Proposed elements






P7	House 4 GIA revised; key amended.	12/10/20
P8	Flat GF5 revised.	21/09/20
P5	Flat GF5 revised.	14/08/20
P4	Flat GF1, GF3, GF4 & GF5 revised; Basement stairs relocated.	02/09/20
P3	General amendments.	27/08/20
P2	Flat GF5 revised.	29/01/19
Rev	Description	Date
CW	Draw	Oct 2017
MK	Draw	

Project Silverlands		
Title Ground Floor GA Plan Including Stables & Coach House		
Drawing Reference 17035-OA-XX-121-P-00		
Drawing No 121	Revision P7	Status S0
Scale 1:50 @ A1 & 1:100 @ A3		

RU.20/1729- Silverlands House, Holloway Hill:

Proposed Ground floor plan- Mansion and Coach house

Key

-  Existing elements to be retained
-  Doors to be retained
-  Proposed elements



Flat FF2
3B 5P
153 sqm GIA

Flat FF3
2B 4P
127 sqm GIA

Rev	Description	Date
P6	House 4 GIA revised: key amended.	12/10/20
P5	House 4 & 5 revised.	21/09/20
P4	Flat FF1, FF3 & FF4 revised.	02/09/20
P3	General amendments.	27/08/20
P2	Flat FF5 omitted, Flat FF3 and FF4 revised.	29/01/19

Partner	Drawn	Date
CW	MK	Oct 2017

Project
Silverlands

Title
First Floor GA Plan
Including Stables &
Coach House

Drawing Reference
17035-OA-XX-122-P-01

Drawing No	Revision	Status
122	P6	S0

Scale
1:50 @ A1 & 1:100 @ A3

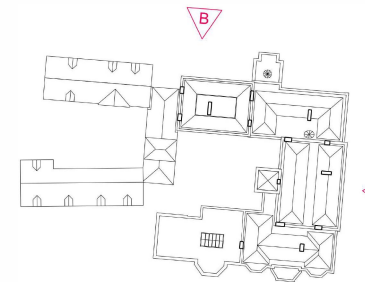
**RU.20/1729- Silverlands
House, Holloway Hill:**

**Proposed First floor plan-
Mansion and Coach house**



ELEVATION A

KEY (plan not to scale)



MATERIALS KEY

- ① Main house brickwork : to be cleaned with JOS Cleaning System and repointed with lime based mortar in selected areas.
- ② Main house existing stone and cement based render details : to be cleaned with JOS Cleaning System
- Coach house and stables painted brickwork : paint to be removed with DOFF Cleaning System, joints to be repointed with lime based mortar.
- ④ Painted timber sash windows (all existing windows to be retained, repaired or replaced if necessary).
- ⑤ Painted steel casement windows (all existing windows to be retained, repaired or replaced if necessary).
- ⑥ Conservation style rooflights.
- ⑦ Spanish slate tiles roof.
- ⑧ Re-created balustraded parapets & architectural details in stone.
- ⑨ Re-created decorative chimney stacks (stack rendered, base & capping in stone).
- ⑩ Existing lead gutters.
- ⑪ New metal gutters & down pipes.
- ⑫ Timber doors (to be retained, repaired or replaced if necessary).

P2 Materials key added 08/10/20

P1 Original balustrades and chimney stacks reinstated, roofrevised 21/09/20

Rev	Description	Date
Drawn	AW	Oct. 2019

Project
Silverlands

Title
**Proposed Elevations
Sheet 1**

Drawing Reference
17035-OA-XX-140-E-00

Drawing No	Revision	Status
140	P2	

Scale
1:100 @ A1 & 1:200 @ A3



ELEVATION B

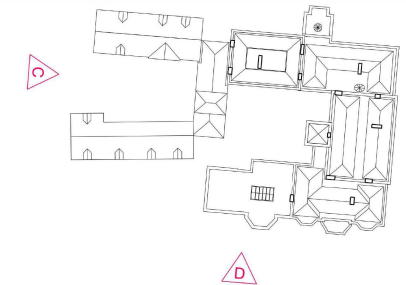
RU.20/1729- Silverlands House, Holloway Hill:

Proposed Elevations (North and East)- Mansion and Coach House



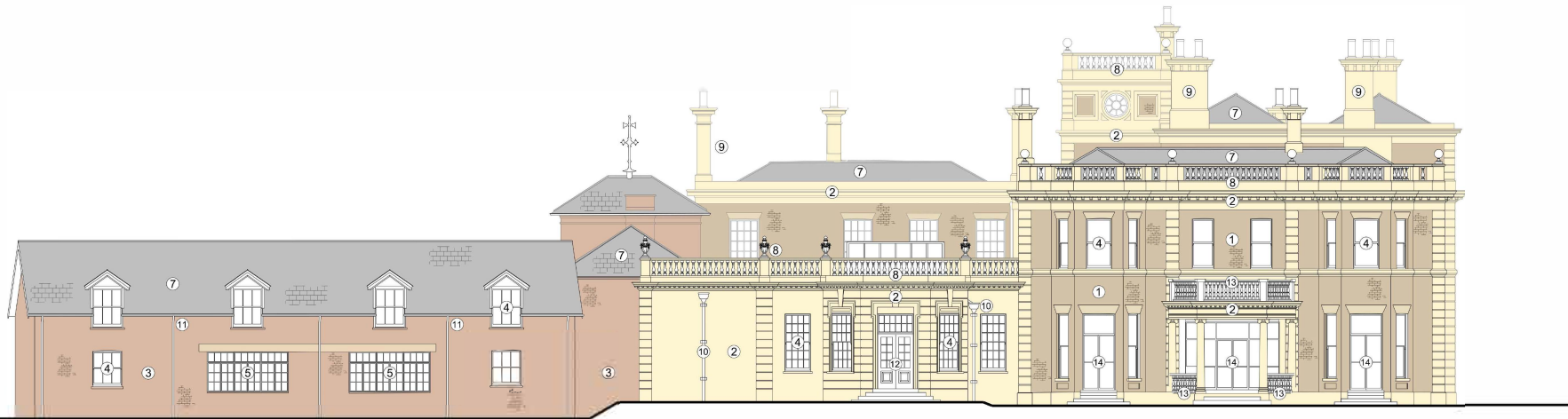
ELEVATION C

KEY (plan not to scale)



MATERIALS KEY

- ① Main house brickwork : to be cleaned with JOS Cleaning System and repointed with lime based mortar in selected areas.
- ② Mainhouse existing stone and cement based render details : to be cleaned with JOS Cleaning System
- Coach house and stables painted brickwork : paint to be removed with DOFF Cleaning System, joints to be repointed with lime based mortar.
- ④ Painted timber sash windows (all existing windows to be retained, repaired or replaced if necessary).
- ⑤ Painted steel casement windows (all existing windows to be retained, repaired or replaced if necessary).
- ⑥ Conservation style roof lights.
- ⑦ Spanish slate tiles roof.
- ⑧ Re-created balustraded parapets & architectural details in stone.
- ⑨ Re-created decorative chimney stacks (stack rendered, base & capping in stone).
- ⑩ Existing lead gutters.
- ⑪ New metal gutters & down pipes.
- ⑫ Timber doors (to be retained, repaired or replaced if necessary).
- ⑬ Existing painted timber balustrade to be restored.
- ⑭ Timber glazed double doors (to be retained, repaired or replaced if necessary).



ELEVATION D

P2	Materials key added.	08/10/20
P1	Original balustrades and chimneys added, roofs revised.	21/09/20
Rev	Description	Date
CW	AW	Oct. 2019

Project
Silverlands

Title
Proposed Elevations Sheet 2

Drawing Reference
17035-OA-XX-141-E-00

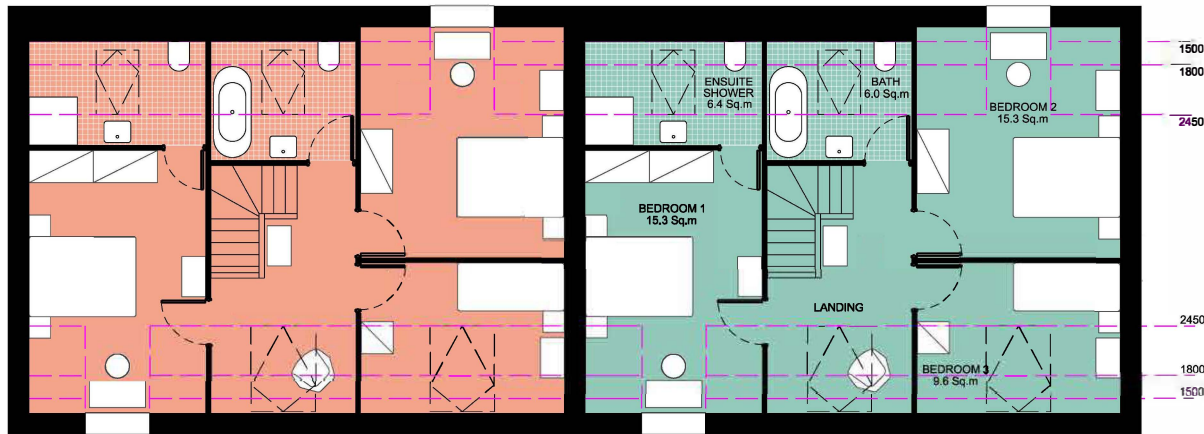
Drawing No	Revision	Status
141	P2	

Scale
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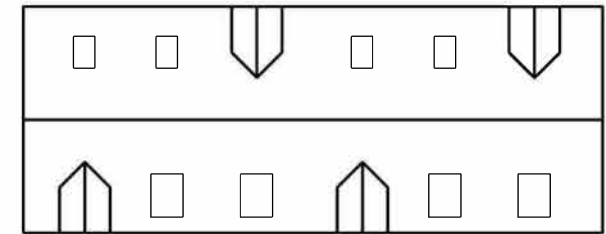


RU.20/1729- Silverlands House, Holloway Hill:

Proposed Elevations (North and East)- Mansion and Coach House

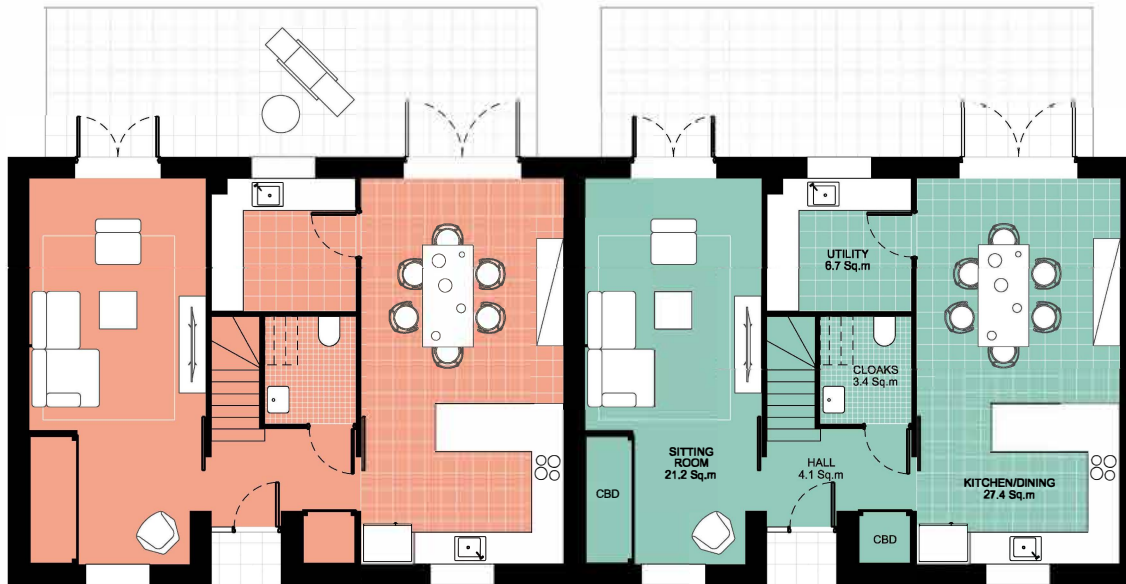


PROPOSED - FIRST FLOOR PLAN



PROPOSED - ROOF PLAN

1:100 @ A1 0 4m
1:200 @ A3



PROPOSED - GROUND FLOOR PLAN

RU.20/1729- Silverlands House, Holloway Hill:

Proposed floor plan- Gate House

P3	New proposal (stable-style)	25/02/22
P2	New proposal	23/08/21
P1	Preliminary Issue	06/10/20
Rev	Description	Date

Partner	Drawn	Date
CW	RB	October 2020

Project
Silverlands

Title
**Proposed Gatehouse
Plans**

Drawing Reference
17035-OA-SK020

Drawing No	Revision	Status
SK020	P3	S0

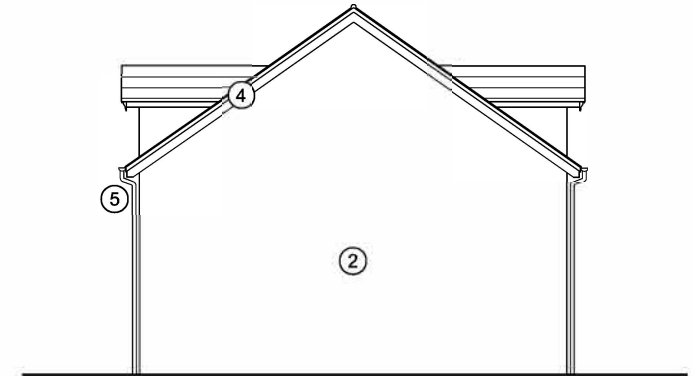
Scale
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RU.20/1729- Silverlands House, Holloway Hill: Proposed Elevations- Gate House



PROPOSED - FRONT ELEVATION



PROPOSED - SIDE ELEVATION

MATERIALS KEY (to match existing coach house)

1. Slate tiles roof
2. Brickwork (color conditioned)
3. Painted timber doors and windows
4. Painted timber fascias
5. Metal gutters and down pipes

Precedent - Existing coach house (paint to be removed)



PROPOSED - REAR ELEVATION

P3	New proposal (stable-style)	25/02/22
P2	New proposal	23/06/21
P1	Preliminary issue	06/10/20
Rev	Description	Date

Partner	Drawn	Date
CW	RB	October 2020

Project
Silverlands

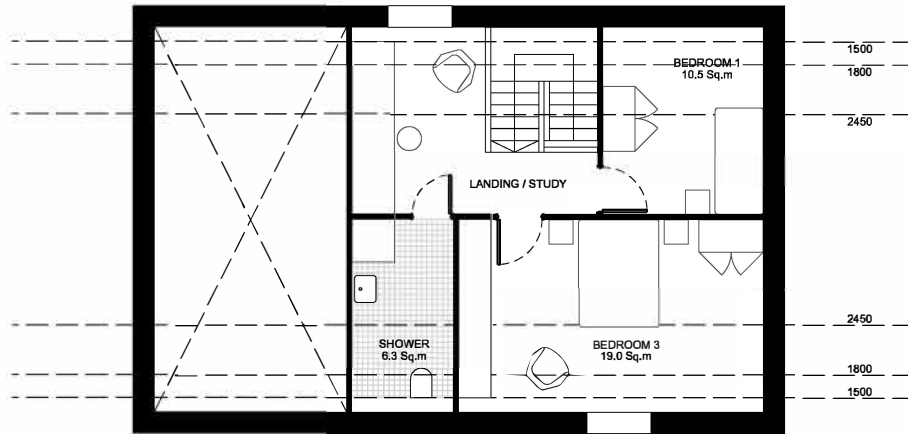
Title
**Proposed Gatehouse
Elevations**

Drawing Reference
17035-OA-SK021

Drawing No	Revision	Status
SK021	P3	S0

Scale
VARIES

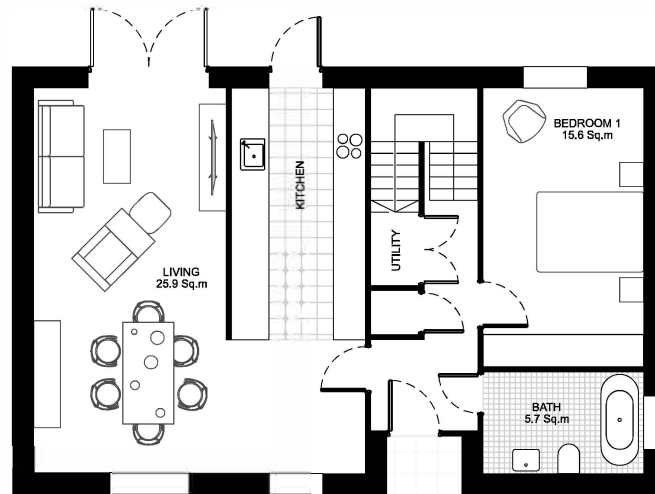




RU.20/1729- Silverlands House, Holloway Hill:

Proposed Floor plans- The Pavilion

PROPOSED - FIRST FLOOR PLAN



PROPOSED - GROUND FLOOR PLAN

P2	New proposal	23/06/21
P1	Preliminary issue	06/10/20
Rev	Description	Date

Partner	Drawn	Date
CW	RB	October 2020

Project
Silverlands

Title
**Proposed Pavilion
Plans**

Drawing Reference
17035-OA-SK010

Drawing No	Revision	Status
SK010	P2	

Scale
1:50 @ A1 & 1:100 @ A3

RU.20/1729- Silverlands House, Holloway Hill:

Proposed Elevations- The Pavilion



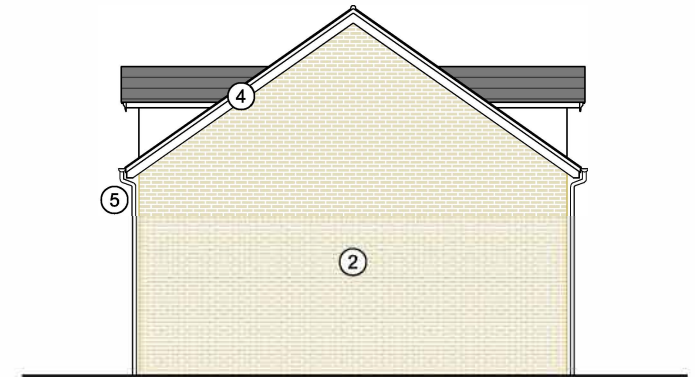
PROPOSED - FRONT ELEVATION

MATERIALS KEY (to match existing coach house)

1. Slate tiles roof
2. Brickwork (color conditioned)
3. Painted timber doors and windows
4. Painted timber fascias
5. Metal gutters and down pipes



PROPOSED - REAR ELEVATION



PROPOSED - SIDE ELEVATION

Precedent - Existing coach house (paint to be removed)



P2	New proposal	23/06/21
P1	Preliminary Issue	06/10/20
Rev	Description	Date

Partner	Drawn	Date
CW	RB	October 2020

Project
Silverlands

Title
Proposed Pavilion Elevations

Drawing Reference
17035-OA-SK011

Drawing No	Revision	Status
SK011	P2	

Scale
VARIES

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Affordable Housing Supplementary Planning Document (SPD) Initial Consultation (Planning, Policy & Economic Development – Judith Orr)

Synopsis of report:

The adopted Runnymede 2030 Local Plan contains a number of policies for securing an appropriate amount and mix of affordable housing units from new development across the Borough, particularly Policies SL20: Affordable Housing and SL19: Housing Mix and Size Requirements. To support the delivery of these policies an Affordable Housing SPD (AH SPD) has been prepared. The SPD provides clarity and guidance on the implementation of the affordable housing policies of the adopted Runnymede 2030 Local Plan by setting out when, how and what affordable housing the Council expects in new developments.

The Council undertook public consultation on a draft of the AH SPD for a period of 8 weeks from 1 December 2021 to 25 January 2022. A total of 9 representations were received. The issues raised in these representations, and any changes made to the AH SPD as a result of these comments, are set out in the Consultation Statement that accompanies this report and which can be viewed at Appendix B. In addition, the Consultation Statement also summarises the issues raised during early stakeholder engagement on the draft SPD and includes any other changes made during the finalisation of the AH SPD and the reasons for these changes.

A number of minor modifications are proposed to the SPD upon its adoption. The modifications have been included in the SPD (shown bold and underlined in the document at Appendix A) and are also set out separately in the Consultation Statement, as explained above.

It is considered that the modifications proposed are minor in nature and as such, do not materially change the draft SPD and so do not require further consultation. As such the Planning Committee is asked to adopt the AH SPD with the modifications outlined in the Consultation Statement.

Recommendation(s): The Planning Committee is recommended to APPROVE the Affordable Housing SPD for adoption, with an implementation date of 20th April 2022.

1. Context of report

- 1.1 The Runnymede 2030 Local Plan contains Policy SL20: Affordable Housing which seeks to ensure that development proposals of 10 or more (net) additional dwellings will provide 35% of dwellings as affordable units. The tenure split of these affordable units proposed in the Plan is 70% affordable/social rent to 30% other forms of affordable housing (including affordable home ownership).
- 1.2 On 24th May 2021 the Government published a Written Ministerial Statement on First Homes. This introduces a requirement that a minimum of 25% of all affordable housing units secured through developer contributions should be a new low-cost home ownership tenure, known as First Homes. The introduction of First Homes therefore results in the tenure mix required in Runnymede changing from the 70:30 set out in Policy SL20, to 25% First Homes, 53% social/ affordable rent and 22% other forms of affordable housing such as, for example, shared ownership.
- 1.3 Policy SL20: Affordable Housing of the Runnymede 2030 Local Plan sets out that the affordable housing requirement applies to all types of residential development falling under use class C3. Sites that have been sub-divided or which are not being developed to their full potential must contribute proportionally towards achieving the amount of affordable housing which would have been appropriate on the whole or larger site.
- 1.4 Policy SL19: Housing Mix and Size Requirements aims to ensure that housing development sites, including those providing affordable housing, deliver a range of housing sizes and types that reflect identified needs over the plan period, taking into account the current housing stock and projected demographic changes. This policy also has important implications for the Affordable Housing SPD and its contents.
- 1.5 Other policies in the adopted 2030 Plan that also have implications for the AH SPD include:

- Policy EE1 (Townscape and Landscape Quality) which sets out the criteria for achieving good urban design within the context of national advice.

- Policy SD7 (Sustainable Design) which contains criteria for development to demonstrate and implement sustainable design measures;

- Policy SD4 (Highway Design Considerations) which contains relevant design and parking standards for vehicle and cycle parking within development proposals and how these will be assessed against the Council's current adopted guidance;

- Policies SD9, SL2- SL18 & IE7- IE11 site allocations which set out the housing requirement for these allocated sites in terms of housing provision.

1.6 The AH SPD will help to support, implement and provide guidance on aspects of the Runnymede 2030 Local Plan policies which relate to affordable housing. The SPD will, once adopted, be a material consideration in decision making.

2. Report and options considered

2.1 The purpose of this report is to inform Members of the representations received during the consultation period on the AH SPD and the resulting modifications which are proposed to be made to the AH SPD to address the issues raised.

2.2 The Consultation Statement, which accompanies this report, sets out the details of the representations and the proposed changes to the AH SPD. These changes mainly relate to points of clarification and are considered to be minor in nature. As a result, it is not considered that they change the general thrust or substance of the SPD and so do not require any further consultation to be undertaken. The Planning Committee is therefore asked to adopt the AH SPD with the modifications set out in the Consultation Statement.

3. Policy framework implications

3.1 Supplementary Planning Documents (SPD) do not form part of the Development Plan for Runnymede but are a material consideration in decision taking.

3.2 Although not part of the Development Plan, once adopted, the SPD will support the Runnymede 2030 Local Plan policies referred to in section 1 of this report. The SPD also supports the 2030 Local Plan vision that the Borough's communities will, *'benefit from improved life chances and reduced inequalities achieved through the creation of inclusive places delivering a range of housing including for those with specialist needs'* and the objectives to *'protect and improve the health & well-being of the population'* and *'to support the delivery of affordable housing, starter homes'*.

4. Financial and resource implications

4.1 Production of the AH SPD has largely been undertaken in-house. The exception to this, is the commuted sum contributions cap work, which was produced by consultants. The methodology used by the consultants in formulating this contribution cap can be viewed at Appendix 3 of the SPD. This work has been funded by the existing budgets of the Planning Policy and Housing Departments.

4.2 The introduction of this SPD, when adopted, will support the Runnymede Housing Strategy Statement 2021-26 particularly the priorities to support delivery of affordable housing in the Borough.

5. Legal implications

5.1 None.

6. Equality implications

6.1 The Council has a Public Sector Duty under the Equalities Act 2020 to have due regard to the need to:

a) Eliminate unlawful discrimination, harassment or victimisation;

b) Advance equality of opportunity between persons who share a Protected Characteristic and persons who do not share it;

c) Foster good relations between those who share a relevant characteristic and persons who do not share those characteristics;

in relation to the 9 'Protected Characteristics' stated within the Act.

- 6.2 The Affordable Housing SPD has been screened to establish whether there may be an impact whether positive or negative on any of the nine protected characteristics (namely, age, disability, race/ethnicity, pregnancy and maternity, religion, sexual orientation, sex, gender reassignment and marriage/civil partnership). The conclusion of the screening assessment has confirmed that the SPD complies with the Council's duty under S149 of the Act and that a full Equalities impact Assessment is not required. A number of minor changes have been made to the EQIA, since it was produced for the draft Affordable Housing SPD, but the conclusions remain unaltered. The latest EqIA assessment is attached as Appendix D for information.

7. **Environmental/Sustainability/Biodiversity Implications**

- 7.1 The Affordable Housing SPD is not part of the Development Plan for Runnymede and as such is not subject to Sustainability Appraisal.
- 7.2 The SPD has however undergone Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening with the conclusion that there will be no likely significant effects on designated habitats or any other significant environmental effects. This conclusion has been checked and confirmed by the three statutory bodies (Environment Agency, Historic England and Natural England), in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004. A copy of the updated screening assessment is attached as Appendix C for information (this updated assessment only contains very minor changes, which mainly relate to the reporting of the comments received from the 3 statutory bodies and the inclusion of a reference to the Thorpe Neighbourhood Plan as a key plan or project in table 1.1).
- 7.3 The SPD has the potential to deliver positive impacts on anyone seeking housing within the Borough particularly those with the protected characteristics of race, disability, sex and age. The Affordable Housing SPD is therefore likely to have a positive impact on health and well-being, including mental health and the well-being of lower paid Runnymede residents.

8. **Other Implications**

- 8.1 None.

9. **Conclusion**

- 9.1 Planning Committee is asked to RESOLVE to:

- i) **APPROVE** the Affordable Housing SPD for adoption, with an implementation date of 20th April 2022.

(To resolve)

Background papers

Appendix A: Affordable Housing Supplementary Planning Document (April 2022)
Appendix B: Regulation 12 Statement of Consultation
Appendix C: SEA/HRA Updated Screening Assessment
Appendix D: EqIA Final Screening Assessment

Runnymede 2030

Local Plan

Affordable Housing Supplementary Planning Document (SPD)

April 2022



Published by Runnymede Borough Council

April 2022

Runnymede Civic Centre

Station Road

Addlestone

Surrey

KT15 2AH

This document can be viewed and downloaded from:

[Supplementary Planning documents and other guidance – Runnymede Borough Council](#)

Photo on the front cover is from a housing scheme in Farm Close in Egham.

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1.0

Introduction

1.1

Executive Summary

- 1.1.1 This supplementary planning document (SPD), **which was adopted on 13th April 2022 (and implemented on 20th April 2022)** focuses on affordable housing in Runnymede and helps to implement the Council's Local Plan policies for affordable housing particularly Policy SL20: Affordable Housing and Policy SL19: Housing Mix and Size Requirements. This SPD contains four distinct sections: part one sets out the policy context at both a national and local level; part two provides details as to how affordable housing will be delivered in the Borough; part three considers viability; and part four provides additional information about planning obligations for affordable housing schemes.
- 1.1.2 Applicants should consider all policies within the adopted Runnymede 2030 Local Plan when making planning applications in the Borough.

1.2 Background

- 1.2.1 It is paramount that local people in Runnymede have the opportunity to live in decent and affordable homes. Securing homes for all is key to ensuring that people have decent life chances, and it also helps to build strong communities and boost the economy.
- 1.2.2 The Office for National Statistics publishes information on house price affordability and the latest figures for Runnymede show that the cost of accommodation in the Borough is high. Median house prices in the Borough are nearly 10 times median gross annual workplace-based earnings¹. The average price for a property in Runnymede stood at £434,562 in May 2021, according to HM Land Registry data. Mortgages were historically expected to be agreed at 3 x gross salary and although this has extended to 4 or 5 x salary with longer payback periods, it is apparent that Runnymede residents within the lower income groups are very unlikely to be able to afford to buy their own homes. Shared ownership models require a smaller deposit and mortgage but as the rent on the unpurchased share is calculated at 2.5 – 3% of the value of the remaining share this can also be prohibitive.
- 1.2.3 Many residents therefore often need to rent a home and the private rented market is therefore buoyant, with most rents set above the level payable by housing benefit or the housing element of Universal Credit. This results in households, including those in employment, being unable to access good quality rented properties within the Borough. This includes a large proportion of public sector staff and those working in retail, as well as carers, and those working in building trades and other jobs which are essential to provide services for the residents of the Borough.
- 1.2.4 As a result, there are a high number of households in Runnymede in affordable housing need with 1196 households on the Housing Register, as at March 2022. The SHMA Update (2018) estimates that the annual level of need for affordable housing in the Borough is 471 dwellings per hectare (dpa). This is almost equal to the full housing allocation in the adopted Runnymede 2030 Local Plan of 498 housing units each year until 2030. Setting a target in relation to the need for affordable housing in the Local Plan was not considered to be realistic or viable, given that the majority of affordable housing will come forward in market schemes. The SHMA therefore advises that the Council should seek to maximise the delivery of affordable housing where opportunities arise².
- 1.2.5 The Council is therefore committed to increasing the delivery of affordable housing, as set out in the Runnymede Housing Strategy Statement 2021-2026 (February 2021). The Council's aspiration, as set out in the Housing Strategy Statement, is "for sufficient and affordable, good quality housing that is accessible and suitable for local people in Runnymede. We are

¹ Median workplace-based affordability ratios (Table 5c) 1997-2020 Officer for National Statistics

² Strategic Housing Market Assessment Update (2018) para. 4.34

responding to the changing demographic and economic needs of our communities to deliver housing that promotes health, wellbeing and financial stability.”

- 1.2.6 This SPD sets out the Council’s approach to securing planning obligations in respect of affordable housing from new development across the Borough. It also aims to provide clarity and guidance on implementing the Runnymede 2030 Local Plan affordable housing policy (Policy SL20) by setting out when, how and what affordable housing the Council expects in new developments. The SPD is a material consideration in decision making.
- 1.2.7 This Supplementary Planning Document (SPD) replaces the existing Runnymede Affordable Housing Supplementary Planning Guidance (adopted on 13th December 2007).
- 1.2.8 The Council is committed to keeping this SPD under review, as part of the wider monitoring of affordable housing delivery for the Local Plan. If monitoring indicates that the affordable housing targets of the Plan are not being met, the Council may need to take remedial action by reviewing this SPD.

1.3 Policy Context – National level

- 1.3.1 The National Planning Policy Framework (2021) includes a definition of what is meant by affordable housing. Homes that don't meet this definition are unlikely to be considered affordable housing for the planning process. The NPPF defines affordable housing as:

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

Affordable Housing Definitions (NPPF Annex 2: Glossary)

Affordable housing for rent

Meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

Starter Homes

specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

Discounted market sales housing

is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

Other affordable routes to home ownership

is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to government or the relevant authority specified in the funding agreement.

Other relevant Definitions – First Homes

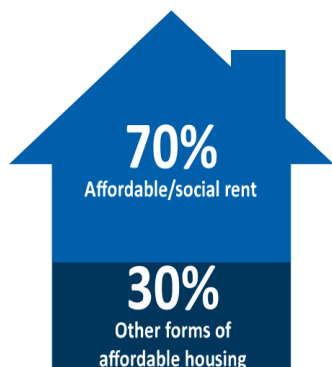
are a new form of discounted market sales housing, introduced by the Government on 28th June 2021. They provide homes for first-time buyers at a discount of a minimum of 30% against the market value and the first sale of the home must be at a price no higher than £250k (outside London).

First Homes are the Government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered through planning obligations, according to the Government's [Planning Practice Guidance on First Homes](#) and the [Written Ministerial Statement](#).

An Interim Policy Statement (IPS) has been produced for First Homes. This sets out how this new form of affordable housing will be applied in Runnymede. As First Homes are being introduced quickly by the Government and, as a result, we don't currently have evidence to include the full extent of local eligibility criteria in the Borough, it is considered that the position on First Homes in Runnymede should be set out in an Interim Policy Statement, as opposed to within this SPD. This will enable future updates to be made as and when more supporting evidence becomes available.

1.4 Policy Context – Borough level

- 1.4.1 The Runnymede 2030 Local Plan was adopted on 16th July 2020. Policy SL20: Affordable Housing of the Plan requires that development proposals of 10 or more



(net) additional units will be expected to provide **35% of dwellings** as affordable units with a tenure split which includes 10% of homes for affordable home ownership (as per NPPF para. 65) .

Policy SL20 applies to all types of residential development falling under Use Class C3 including change of use, conversions and mixed-use sites that incorporate an element of residential development. The only exceptions are for Gypsy and Traveller pitches or Travelling Showpeople plots.

Where sites are sub-divided or not being developed to their full potential, each smaller development must contribute proportionally towards achieving the amount of affordable housing which would have been appropriate on the whole or larger site.

Other Key Local Plan Policies

The policies an application for affordable housing is considered against will depend on the scheme. However, there are several key policies in the Local Plan that may need to be considered:

SL19: Housing Mix and Size Requirements

SD1: Spatial Development Strategy

SD2: Site Allocations

SD7: Sustainable Design

This list is not exhaustive, and applicants should consider all policies within the adopted Plan when making planning applications, particularly those relating to specific site allocations.

Delivery

2.1 Planning Application Process

Pre-application Stage

- 2.1.1 All applicants are encouraged to make use of the Council's pre- application advice service before making a planning application. Pre application discussions with a registered provider may also be appropriate.
- 2.1.2 Pre-application dialogue is particularly important where the proposed development may give rise to an affordable housing requirement. This will allow issues such as local housing need and demand to be considered in addition to the form of any affordable housing contribution.
- 2.1.3 The discussions with the local planning authority and registered provider will need to include the following, as appropriate:
- Clarify the amount, type, size, and tenure of affordable housing to be provided;
 - Identify the Council's preferred affordable housing providers and contact details to discuss the delivery of the affordable housing element of the development; and,
 - Whether specialist providers will need to be engaged in relation to the proposed development, in order to gain a better understanding of any requirements they might have in relation to the proposed development;

Planning Application Stage

- 2.1.4 At the application stage, where affordable housing is required, applications will need to be accompanied by draft Heads of Terms, set out within the supporting Planning Statement. The agreement will need to detail the number, type and tenure mix of the affordable housing, including a draft nominations agreement if necessary (further information on this can be obtained by contacting the Housing Business Development and Policy team at the Council). If an application for 10 units or more (net) does not set out how the affordable housing requirement will be provided, the application will not be validated and will be returned to the applicant. Once the affordable housing provision has been agreed and the fees paid, the Council will draft an appropriate Section 106 agreement, based on the template set out in Appendix 2 below . **Please check with Legal Services to see the latest version of the s106 agreement.**

Affordable housing providers

- 2.1.5 The Council's preference is for affordable housing to be provided and managed by established affordable housing providers or by the Council. The Council works with a number of affordable housing providers that meet the following criteria:
- Own and manage stock in the Borough;

- Have a commitment to developing in the Borough;
 - Have a commitment to maintaining a proactive housing management presence in the Borough;
 - Have a proven ability to working in partnership on the Council's Tenancy Strategy priorities; and/ or
 - Have a proven ability to fund and deliver sustainable affordable housing.
- 2.1.6 A list of the Council's preferred affordable housing providers ([Preferred RP Development Partners \(runnymede.gov.uk\)](https://runnymede.gov.uk)) is available on the Council's website.
- 2.1.7 The Council will encourage developers to work in partnership with preferred affordable housing providers. However, if a developer proposes to provide affordable housing other than through a preferred provider, the Council will consider this, taking account of the following:
- Whether the organisation has **a local and responsive housing management and maintenance service** ~~any other affordable housing in the Borough or in neighbouring local authority areas;~~
 - ~~● Past commitment and performance in the Borough;~~
 - ~~● Local management base and arrangements for interaction with tenants;~~
 - Management arrangements for external amenity space;
 - Affordable Rent levels set within Local Housing Allowance levels;
 - Nomination arrangements;
 - ~~● Track record in delivering and funding affordable housing;~~
 - ~~● Participation in community sustainment;~~
 - Genuine community led development, via a Community Land Trust;
 - **Positive engagement with the local authority, supporting the Borough's Housing Strategy;**
 - **Demonstrable commitment to Equality and Diversity in the local setting;**
 - **High levels of customer satisfaction;**
 - **Commitment to Net Zero and sustainability; and**
 - **Commitment to affordability and tenancy sustainment.**
- 2.1.8 **The Council has established good relationships with a number of Partner Registered Providers (known as 'Partner RPs') that operate effectively in partnership with the Council to provide affordable housing that meets local housing need. As such, the Council encourages developers to meet their affordable housing obligations by forming a partnership with one of the Council's Partner Registered Providers following discussion with the Council's Housing department. Applicants should contact the Council for an up-to-date list of Partner Registered Providers and advice on which Registered Provider would be most appropriate for their development.** In all cases the provider of on-site affordable housing will need to meet the requirements of this document.

2.2 Provision of affordable housing

- 2.2.1 The site threshold at which affordable housing will be sought is set out in Policy SL20: Affordable Housing of the adopted Runnymede 2030 Local Plan (see paragraph 1.4.1 above).
- 2.2.2 In considering the capacity of sites for development, applicants should make appropriate and efficient use of the land in accordance with Policy EE1: Townscape and Landscape Quality of the adopted Local Plan and the NPPF³. If the development does not make optimum use of the site (for example, by providing uncharacteristically large plot sizes, and/or failing to provide smaller dwellings to meet identified housing needs), the Council may conclude that the use of the land is not appropriate, and/ or that not enough affordable housing is being provided.
- 2.2.3 Policy SL20 specifically states that developers may not circumvent the policy by artificially subdividing sites or by failing to develop a site to its full potential. The development site itself (as identified by the 'red line') should include all existing elements of built development that are being materially modified (e.g. extended, reconfigured or converted). As such, any existing dwelling or building on a plot proposed for development should only be excluded if there is no material alteration to that building proposed. If there are changes to the access, garden or parking, serving an existing dwelling or building, the Council may well conclude that the land and building in question form part of the same development site.
- 2.2.4 Should two or more separate planning applications come forward within 5 years for adjacent sites within the same ownership and/or which have a clear functional link, the Council may conclude that the developments should be considered as a single scheme. The Council will, in such cases, consider evidence including land transaction data, the closeness in time of the applications being made, and appropriate evidence of ownership at the times the respective applications were made.
- 2.2.5 The purpose of the following examples is to demonstrate how this calculation of the larger developable area works in practise:

³ Paragraphs 124 and 125c of the National Planning Policy Framework

Example 1: Prior Approval is sought to convert an existing office building into flats through permitted development. Planning permission is also being sought to redevelop part of the existing office car park into 8 flats. No affordable housing is required for the conversion of the offices. It is considered that the flats in the car park form part of a larger developable area and as such a contribution of 35% affordable housing will be required to be provided for the 8 additional flats i.e. 2.8 (rounded up to 3) affordable units will need to be provided on that site.

Example 2: It is proposed that a new access road is built for the development of 8 new dwellings. A subsequent application is submitted to use the same access road for an additional 4 dwellings. It is clear that whilst neither of the developments triggers the affordable housing requirement in its own right, the two sites together, regardless of ownership, form part of a larger developable area. Both sites would therefore be expected to provide a proportion of the affordable housing on a pro rata basis i.e. 35% x 8 (3 units) and 35% x 4 (1.4 round down to 1).

2.3 Mix, size and Tenure

- 2.3.1 Policy SL19: Housing Mix and Size Requirements of the Runnymede 2030 Local Plan aims to ensure that housing development sites deliver a range of (general) housing sizes and types that reflect the needs of the Housing Market Area (HMA) over the plan period taking into account the current housing stock and projected demographic changes.
- 2.3.2 The affordable **housing mix** shown in the table below is taken from the Council’s 2018 Strategic Housing Market Assessment (SHMA). Overall, the SHMA shows that the greatest need for affordable housing is for 2- and 3-bedroom properties.

Table 1: shows the need for affordable housing in Runnymede Borough

Housing Mix	1 bedroom	2-bedroom	3-bedroom	4-bedroom
Low cost home ownership	15-20%	40-45%	25-30%	10-15%
Rented (social/affordable rent)	10-15%	40-45%	35-40%	5-10%

Source: Section 6 of the 2018 SHMA Update

- 2.3.3 Development proposals which depart significantly from the required mix of housing will only be supported where evidence submitted by the applicant demonstrates that such a mix would not be feasible or viable. This issue is considered in more detail below, in part 3 of this document.
- 2.3.4 In terms of **size considerations for affordable housing developments**, the Council expects high quality homes to be delivered over the period of the Local Plan, which are designed to ensure sufficient space is available for furniture, activity, and movement. The Government has produced **Nationally Prescribed Space Standards**. These standards set out the minimum acceptable gross internal area in square metres for dwellings depending on the number of bedrooms, the number of intended occupiers and the number of storeys.
- 2.3.5 The Council’s evidence which underpinned the Local Plan indicated a need for these national space standards to be applied in the Borough for 1-to-3-bedroom units, and consequently they now form part of Policy SL19 of the adopted Runnymede Local Plan. The purpose of these standards is to ensure that homes in the Borough are designed with sufficient internal space. The minimum gross internal floor areas and storage spaces expected in new developments (sqm) are included as part of Policy SL19 but are reproduced below for convenience.
- 2.3.6 Applicants are encouraged to seek confirmation of the Council’s current requirements for the mix, size and tenure of properties as part of pre-application discussions. This is particularly important for rented properties as housing needs can fluctuate.

Table 2: shows the minimum gross internal floor areas expected for affordable housing units in new developments in Runnymede Borough

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built in storage
1 b	1p	39 (37) *			1.0
	2p	50	58		1.5
2 b	3p	61	70		2.0
	4p	70	79		
3 b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

*Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from 39sqm to 37sqm, as shown bracketed.

- 2.3.7 The Council recognises that not all sites will be able to accommodate the full range of housing types and sizes due to location, individual site characteristics or viability. The Council will therefore take into account the nature and location of the scheme, and in particular whether there are any genuine reasons why the mix of types and sizes sought cannot be delivered in practice.
- 2.3.8 In terms of **tenure**, the overall housing target, **as set out in Policy SL20 of the adopted Local Plan**, is to provide 70% of the total dwellings as social/affordable rented properties and 30% as other forms of affordable housing. Social rent is the preferred form of tenure of affordable housing needed in the Borough.
- 2.3.9 The revised NPPF 2021 expects at least 10% of the total number of homes to be available for affordable home ownership on major developments involving the provision of housing (some exemptions are listed in the NPPF) and this is embedded into Policy SL20 of the Local Plan.
- 2.3.10 As set out above (para. 1.3.1), the Council’s adopted Local Plan does not make any provision for First Homes, a new form of affordable home ownership. **The details of the implementation of First Homes in Runnymede are set out separately in an Interim Policy Statement (IPS). However, it is important to note that the introduction of First Homes results in the tenure mix of affordable housing in Runnymede changing from the 70:30 split outlined in para. 2.3.8 above, to 25% First Homes, 53% social/ affordable rent and 30% other forms of affordable housing, as is clearly set out in the IPS.**
- 2.3.11 Where the calculation of the number of affordable units required results in a figure of less than a dwelling, the Council will round up to the nearest number of whole units where the number is

0.5 or above, or down where it is below 0.5. However, if the split of dwellings results in 0.5 of rented, and 0.5 of another type of affordable housing, it is the rented accommodation that needs to be rounded up, as this is the predominant form of affordable housing need in the Borough.

2.3.12 The Council expects applicants to be transparent, as far as practicable, at the application stage about the tenure mix proposed for a particular site. However, it is recognised that this is not always possible, as the tenure mix will often depend on what grant the provider is able to achieve. For sites with planning permission that later propose to include additional affordable housing on the site over and above the policy requirement of 35% set out in policy SL20 of the Local Plan, consideration will be given to the scale, location, tenure mix, local housing need, design, sustainability (energy efficiency), impact on infrastructure, and future management of the site.

2.3.13 For the avoidance of doubt, where the Council is minded to grant planning permission for a development proposal, S106 agreements will confirm the amount of affordable housing required to be provided on a site, in line with the application proposal before the Council. If an applicant wishes to amend their planning consent at a later date to propose additional affordable housing, a Deed of Variation will be required to vary the existing S106 agreement.

2.4 Design Requirements

2.4.1 The Council's expectation for new developments is that the affordable homes should be indistinguishable from, and well-integrated within, the market housing on the site. In other words, the design quality of the affordable housing should be as good, if not better, than the private market housing. The Council adopted a [Design Supplementary Planning Document](#) (SPD) in June 2021 for new build developments in the Borough. The Design SPD sets out guidance for applicants to ensure that design and quality is fully considered for development proposals in the Borough, including those which include affordable housing.

2.4.2 In addition, adopted and emerging neighbourhood plans may also contain design policies, and these may well also need to be taken into consideration, depending on where in the Borough the proposed dwellings are located.

2.4.3 Existing design policies from the adopted Runnymede 2030 Local Plan also need to be considered when designing affordable housing. These include Policy EE1: Townscape and Landscape Quality, which sets out the criteria for achieving good urban design within the context of national advice. Other policies in the Local Plan that deal with design issues which may need to be considered for affordable housing developments include:

- Policy SD4: Highway Design considerations;
- Policy SD7: Sustainable design; and
- Policies SL2 to SL18, SD9 and Policies IE7 to IE11.

2.4.4 The Council would normally expect the affordable homes to be distributed throughout the site, dependent on the scale and design of the development, to promote an inclusive, sustainable community.

- 2.4.5 The Affordable Housing Units shall be constructed in accordance with the requirements imposed by Homes England's Design and Quality Standards (mandatory items) current at the time of construction.
- 2.4.6 The majority of residents of affordable housing are car users. Parking for affordable housing should meet the Council's current parking standards at the time of the application. The Council expects the same parking provision to be made available for affordable and market housing of the same size. Tenure neutrality is also required in the design of car parking for affordable housing.

2.5 Off Site Provision

- 2.5.1 Normally affordable housing will be required to be on-site in line with the NPPF (2021: paragraph 63) but in exceptional circumstances where management of the units would be difficult, the Council might allow a commuted sum to be paid instead of on-site provision.

What is a commuted sum?

- 2.5.2 A commuted sum (or payment in lieu) is an amount of money, paid by a developer to the Council. These are only applied in exceptional circumstances where the size or scale of a development triggers a requirement for affordable housing, but it is not possible to achieve appropriate affordable housing on site.
- 2.5.3 Where a commuted sum is proposed, the onus will be placed on the applicant to demonstrate why it is not possible to provide the affordable housing on site. The applicant will also need to show that other options – for example cross-subsidy between rented and shared ownership units/other affordable tenures or providing the affordable housing on another site – have been considered, and why they were not viable.
- 2.5.4 This route will be followed only where more direct provision of affordable homes has been explored and the Council is satisfied that due to the provision of robust and evidenced reasons, it is not workable given the particular circumstances.
- 2.5.5 The commuted sum payment will need to take full account of how much it would cost for these affordable dwellings to go elsewhere, including the land costs of the replacement site. The final sum agreed will be at the Council's discretion.

What are the steps in calculating the payment?

- 2.5.6 **The Council commissioned a consultant, BPS, to provide a robust methodology to calculate affordable housing commuted sum requirements in the Borough. The detailed report setting out how this formula has been derived is set out as Appendix 3 to this SPD. This approach should be followed by applicants for calculating any commuted sum payments that are likely to be required in lieu of on-site affordable housing for schemes that have been agreed with the Council.**

How will the money be used?

- 2.5.7 The Council will use financial commuted sums in a number of ways and will require the flexibility to do so to be reflected in the Section 106 Agreement or Unilateral Undertaking.
- 2.5.8 Affordable housing providers can apply to the Council for commuted sum funding for their schemes; these funds can also be spent on Council new build developments.
- 2.5.9 Commuted sums will be earmarked to enable the provision of affordable housing through a variety of means. Decisions on the expenditure of financial contributions will be made in accordance with [Council's Constitution](#), details of which are available on the Council's website.

2.6 Vacant Building Credit

- 2.6.1 The Government's PPG on Planning Obligations states that a vacant building credit will be applied to applicable developments where a vacant building is either converted or demolished. The credit is equivalent to the gross internal floor area (GIFA) of the building to be demolished or brought back into use.
- 2.6.2 The credit does not apply when a building has been abandoned or where a building has been made vacant for the sole purpose of re-development. Certain evidence will be required from applicants to demonstrate that the form and length of the marketing campaign has been appropriate. Evidence of a good marketing campaign should include:

a. a year's worth of robust advertising

- The site must have been made available to the market at a realistic price and actively marketed to a wide range of potential clients through a recognised firm of commercial property consultants, with a track record of selling/ letting similar properties in the Borough for a minimum of a year.

b. Evidence to be included in the marketing report

- Dated photographs of marketing boards on display during the time that the site was marketed.
- Detailed records kept and recorded of any interest that has been shown in the site.
- Web-based marketing undertaken through relevant search engines, recorded by date of adverts.
- Dated copies of any advertisements placed in target publications.
- The price and terms at which the property was marketed should be in a format that enables easy comparison, using equivalent and comparable expressions of price per unit of floorspace. Where the price changed during the period of the marketing campaign, the reasons for this should be recorded and included in the marketing report.

- 2.6.3 Where it can be satisfactorily demonstrated that the building is eligible for vacant building credit and the evidence, set out in the table above, has been provided, a vacant building credit will be included for the scheme. Below is a worked example of how the vacant building credit is calculated in Runnymede Borough.

Worked example of a scheme using VBC credit:

If a scheme comes forward for **20 units** with a GIFA of 2,500sqm

The existing building on the site which is proposed to be demolished has an area of 625sqm, has been vacant for over a year and has been advertised

The affordable housing requirement is **7 units** (35% of 20).

Proposed GIFA: **2,500sqm**

Existing GIFA: **625sqm**

Existing divided by proposed x 100

$$625 / 2,500 \times 100 = \mathbf{25\%}$$

$$20 \text{ units} \times 25\% = \mathbf{5 \text{ units}}$$

Viability

3.1 Development Viability

- 3.1.1 Runnymede Borough Council has an up-to-date Local Plan, having been adopted in July 2020. The policies in the Local Plan have been tested through the Whole Plan Viability Study (January 2018) and found to be sound by the Inspector.
- 3.1.2 This study included the Council's best estimates of the expected contributions for infrastructure (including from CIL), considered necessary for the developments to proceed and the levels and type of affordable housing required.
- 3.1.3 Delivery of affordable housing is a key priority for the Council. Therefore, if a viability issue arises, consideration is expected to be given to a range of alternative options before a reduction or removal of affordable housing will be considered. This will include prioritising the provision of affordable housing over other less critical infrastructure contributions to ensure viability. The decision to prioritise affordable housing over other infrastructure will need to be made on a case-by-case basis, depending on where the site is and what the infrastructure is like in the vicinity.
- 3.1.4 In line with revised national planning policy and guidance, it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability appraisal at the planning application stage. It is clear from the PPG that there will be limited circumstances where viability testing at the planning application stage is considered necessary.
- 3.1.5 Examples of circumstances where a Viability Appraisal will be accepted, set out within the PPG, and relied upon by the Council in its approach include:
- where development is proposed on unallocated sites of a wholly different type to those used in the viability assessment that informed the plan;
 - where further information on infrastructure or site costs is required;
 - where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent or housing for older people); or
 - where a recession or similar significant economic changes have occurred since the plan was brought into force.
- 3.1.6 Planning applications that are accompanied by a viability appraisal should be based upon and refer back to the viability appraisal that informed the Local Plan. The applicant should provide evidence of what has changed since then, in line with national policy advice, to demonstrate the need for a viability appraisal to be undertaken.

3.1.7 In accordance with guidance, set out in the Planning Practice Guidance and also in the adopted Runnymede 2030 Local Plan (para. 6.36), the price paid for land is not a relevant justification for failing to accord with relevant policies in the Plan.

Basis of the Financial Viability Appraisal

3.1.8 Viability appraisals are sensitive to minor changes in the figures used to calculate viability and also to variations in methodology. Where viability is cited as a barrier to development and is supported by a financial viability appraisal (FVA) (if justified in accordance with paragraph 3.1.4 above), the Council will expect the developer to pay for the independent review of the FVA by the Council's retained viability consultants.

3.1.9 The Council expects an FVA to be undertaken using a residual land value approach. The Residual Land Value is the amount that a developer is able to pay for a site, whilst still being able to deliver the project once all reasonable costs have been met. It is the difference between the value of the completed development on the one hand, and the overall cost of the development on the other. The figure below shows a simplified form of how this calculation works.

3.1.10 To establish whether a scheme is viable, the residual land value is compared with a benchmark land value (BLV). This is defined as the value of the site in its existing use (the existing use value or EUV), plus a premium for the landowner which is the minimum return at which it is considered reasonable that a landowner would sell their land for development.

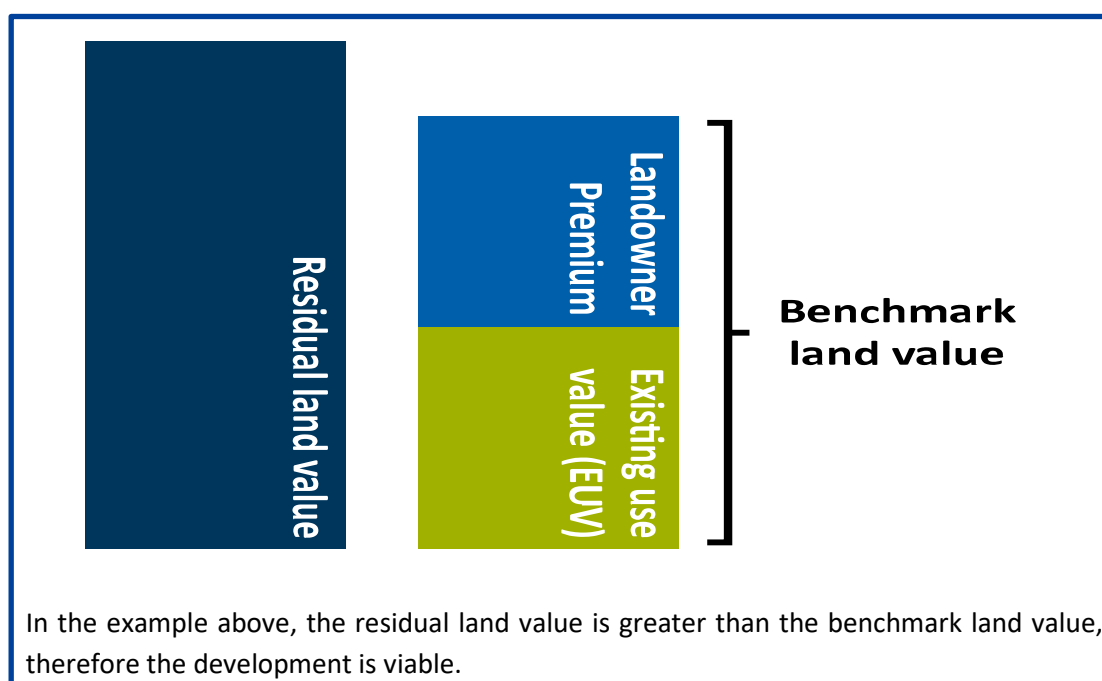


3.1.11 When assessing the viability of a scheme, a number of key inputs are required. The minimum content for an applicant's viability appraisal is set out in Appendix 1. In brief, the viability submission should include as the key elements:

- A summary clearly stating the request to vary the usual affordable housing requirements and setting out (with explanation) the reasons why, in the applicant's view, the development is unviable when policy compliant affordable housing provision is included; and,

- Detailed Financial Viability Appraisal(s) with supporting information, and all sources stated, demonstrating how the applicant’s assumptions and reasoning come together to inform in detail the submitted viability view.

3.1.12 The Residual Land Value should be supported by evidence from comparable development land sales (this can provide a sense check). In addition, the Council will expect confirmation of the price paid for the property/land or the price expected to be paid for the property/land on the grant of planning permission together with confirmation of the contractual terms relevant to the determination of the purchase price within any contingent sale agreement or option agreement including minimum price and overage provisions. Price paid is not allowable evidence for the assessment of BLV and cannot be used to justify failing to comply with policy.



3.1.13 The Council will assume that the cost of meeting the affordable housing requirements in Policy SL20 of the adopted Local Plan should be reflected in the price paid, or price to be paid for the land, and should be based on the following:

- No public subsidy or grant;
- Payment by the provider of the affordable housing should be based on the provision meeting current Homes England guidance on Design and Quality Standards (mandatory items);
- Any site constraints and the development scope (including as influenced by planning policies) including abnormalities should be reflected in the price paid, or to be paid, for the land; and
- In accordance with the relevant viability guidance, the land value to be used in the calculation or as a land value benchmark should be based on the current existing use land value, not necessarily the amount paid for the land.

- 3.1.14 Where a developer raises viability concerns in relation to contributions for an application, the Council will, as set out in the adopted Runnymede 2030 Local Plan, expect a full “[open-book](#)” viability assessment for the scheme, unless in **exceptional circumstances** the applicant can clearly demonstrate why parts of the assessment are so commercially sensitive that they must be redacted. The applicant must highlight the scope of this prior to submission, in order for the Council to make a judgement as to what information is released for public view. The weight to be given to a viability assessment will take into account the transparency of the applicants’ approach.
- 3.1.15 The Council will ordinarily request an independent review of the viability appraisal and its supporting evidence by their retained viability consultants to ensure the robustness and validity of the assumptions and methods used. This review would be required to be funded by the applicant. The applicant will also be required to provide a written undertaking to cover the costs before the viability consultant is appointed. Viability reports resulting from this process will be shared and discussed with the applicant.
- 3.1.16 If an applicant wishes to make a viability submission, this should be included as part of the planning application. A draft Unilateral Undertaking may also be included at the applicant’s discretion. It should be noted that planning applications without the required information or documentation are unlikely to be validated.
- 3.1.17 A Financial Viability Appraisal, including the conclusions drawn, and information/sources relied upon is only current at the time it is prepared. Financial viability will vary over time with the changing economic and property markets. On large sites that are expected to build or sell over phased periods of a number of years, and particularly where the planning application is in Outline, viability may need to be assessed at multiple/varying points. It will likely need to be considered at pre-application/initial application stage and updated when the Reserved Matters application is made or prior to the commencement of each phase.
- 3.1.18 Where, following the above process, conflicts of opinion about scheme viability remain, additional viability work may be necessary. If this is the case, the applicant must first undertake to reimburse the Council in respect of additional costs incurred.

Outcome of the assessment of scheme viability

- 3.1.19 Where the Council is satisfied that the usual policy requirements for affordable housing cannot be met in full due to viability issues, it will decide on the appropriate level of reduction or other revision to the affordable housing requirement to enable the scheme to remain financially viable.
- 3.1.20 Where the level of affordable housing provision is reduced due to an accepted viability submission position, clawback or top up by way of an affordable housing financial contribution will be pursued by the Council with the developer prior to the grant of planning permission if it is believed that, should market circumstances materially alter between the granting of permission and delivery, the development of the site may potentially prove to be

significantly more viable on completion than as indicated in the initial viability submission. **Where a viability case has been accepted on an outline planning application this should be reviewed at the reserved matters stage. For other non-policy compliant schemes, clawback or a similar alternative arrangement will be considered. Appropriate triggers for reviews at different stages of development or phases may be required in agreements.**

Late-stage viability reviews

- 3.1.21 If the Council decides a clawback or similar arrangement is required, this will be incorporated into an initial Section 106 Agreement with the developer, which will include details of the mechanism for calculating any clawback or top up provision. This will be based on the estimated initial cost plan, values, revenues, etc. of the proposed development from the viability submission made with the application, and the s106 will provide for this to be reviewed subsequently on the completion of the development, if the Council considers this is required. In the event of disagreement between the parties, any further viability assessment that may be necessary will be carried out by an independent RICS-qualified surveyor/valuer. Where a development is to be carried out in phases, the s106 Agreement may provide for further viability assessment and possible clawback or top up payments on, or prior to, the completion of phases.
- 3.1.22 The method of indexation will be negotiated with the applicant and once agreed, will be specified within the Section 106 agreement. The method will generally be based on the published Retail Price Index (RPI) or an appropriate index published by the Build Cost Information Service (BCIS), which is the responsibility of the RICS. If there is a decrease in the relevant agreed index, the financial contribution payable shall not fall below the figure originally set out within the Section 106 agreement.

Planning Obligations

4.1 Legal agreements

- 4.1.1 Planning obligations are used to make a development acceptable in planning terms. Legal agreements are the tool to secure planning obligations and are negotiated between local planning authorities and those with an interest in a piece of land (e.g. developers, landowners, agents). Planning obligations can be secured either through a bilateral Section 106 Agreement or through a 'Unilateral Undertaking' from a developer. Unilateral Undertakings are only signed by the landowner(s) and any other parties with an interest in the land, and not by the Council. These unilateral obligations are most frequently used in planning appeal situations but can also be used in other circumstances.
- 4.1.2 The statutory basis for allowing anyone with an interest in a piece of land in the area of a local planning authority to enter into planning obligations is Section 106 of The Town and Country Planning Act (TCPA) 1990 (as amended).
- 4.1.3 The Council will expect developers to enter into an appropriate Section 106 Agreement covering all aspects of the delivery of affordable housing on the application site. An estimate of the fee payable for this can be obtained from the Council's Legal Team. The fee will depend on the complexity of the agreement.
- 4.1.4 The Section 106 agreement will include requirements relating to:
- Definition of affordable housing and affordable tenures
 - The bed size, tenure mix and location of affordable housing
 - Agreement with the Council on the Affordable Housing provision
 - Safeguarding use of homes as affordable dwellings for future eligible households
 - Expectation to recycle any receipts or grant arising from the disposal of all or part of an affordable dwelling
 - Mortgagee in Possession clauses and limitations on the occupation of the affordable housing
 - Nomination agreements for allocating affordable housing.

- 4.1.5 A Template Section 106 Agreement is attached as Appendix 2 to this document.
- 4.1.6 The Section 106 Agreement should be finalised and ready for completion prior to the determination of the application (see para. 2.1.5). There may be circumstances, particularly with Outline applications, where the details of affordable housing provision have not been finalised. The Affordable Housing provision would need to be submitted to and approved by the Council prior to the commencement of the development. In the case of Outline applications, it is recommended that provision for affordable housing should be submitted as part of the Reserved Matters application, when known.
- 4.1.7 The details of the affordable housing provision to be provided are:
- a. Total number and % of affordable homes
 - b. Anticipated tenure/ bed size/ type/ gross internal floor areas
 - c. Site layout showing location of affordable homes
 - d. Affordable housing provider
 - e. Nomination and management arrangements
- 4.1.8 Planning obligations secured by way of a Section 106 agreement or Unilateral Undertaking are binding on the land and are therefore enforceable against all successors in title. They are registered as a local land charge and will remain on the register. They will, therefore, be revealed on local searches until the planning obligation has been fully complied with or the planning permission to which the Section 106 agreement or Unilateral Undertaking relates has expired.
- 4.1.9 If the Council has evidence that a planning obligation is not being complied with, the Council will consider whether enforcement action should be taken.

Scheduling affordable housing delivery

- 4.1.10 The Council will normally include triggers in the legal agreement in relation to the delivery of the affordable housing. These may vary from site to site, but a guide would be:
- Not to allow the commencement of development until a contract has been entered into with an Affordable Housing Provider to deliver the affordable housing.
 - Not to permit nor enable more than 50% of the Open Market Units (or as otherwise agreed in writing between the Borough Council and the Parties) to be in occupation until the date upon which the Parties or their successors in title have transferred the freehold interest in the Affordable Housing Land to the agreed Affordable Housing Provider.
 - Not to permit nor enable more than 75% of the Open Market Units to be in occupation until the date upon which the Parties or their successors in title have completed the affordable housing units.

Maintaining accommodation as affordable housing

4.1.11 In order to ensure that the need for affordable housing in Runnymede Borough continues to be met in the future, there should be provisions that either preserve the status of the affordable housing, replace it, or, if it is no longer used for affordable housing, that resources derived from it are recycled to replace the dwelling(s) that have been lost.

4.1.12 The Council will, therefore, require provisions in the Section 106 agreement that:

- Keep the units within the definition of affordable housing; and
- Require any purchaser (other than an occupier) to preserve the accommodation as affordable housing in perpetuity, or replace it within the Borough, like for like; and
- Require any purchaser to take on the obligations in the Nomination Agreement or enter into a replacement Nomination Agreement.

Replacing affordable housing that is lost

4.1.13 Affordable dwellings may be lost for a number of reasons. These include when a tenant's statutory acquisition of a rented dwelling occurs, shared ownership staircasing to 100% occurs and when the discharge of the charge on a shared-equity dwelling takes place. In all cases the Council expects the dwelling(s) to be replaced within the Borough, or any monies arising from the disposal of the dwelling(s) to be recycled to provide further affordable housing in the Borough, whenever possible.

Glossary

Benchmark Land Value (BLV): This is defined as the value of the site in its existing use (the existing use value or EUV), plus a premium for the landowner which is the minimum return at which it is considered a reasonable landowner would sell their land for development.

Cost plan: a plan setting out in detail what the actual costs associated with the development are likely to be, as opposed to what has been budgeted for.

Clawback or overage: Planning overage is an **uplift payment due once planning permission has been obtained** because, due to the grant of such planning permission, the land value has increased significantly from the original price paid.

Community Infrastructure Levy (CIL): a planning charge, introduced as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. It allows local authorities to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development.

Existing Use Value (EUV): the value of the site in its existing use.

First Homes: this form of discounted market sales housing was introduced on 28th June 2021. They provide homes for first-time buyers at a discount of a minimum of 30% against the market value and the first sale of the home must be at a price no higher than £250k (outside London).

Financial Viability Assessment (FVA): a process of assessing whether a site is financially viable by looking at whether the value generated by a development is more than the cost of developing it.

Gross Internal Floor area (GIFA): is the whole enclosed area of a building within the external walls taking each floor into account and excluding the thickness of the external walls.

Homes England: Homes England is the Government's national housing and regeneration agency for England. It provides investment for new affordable housing and to improve existing social housing, as well as for regenerating land. It is also the regulator for social housing providers in England.

Indexation: Indexation can be done to adjust for the effects of inflation, cost of living, or input prices over time, or to adjust for different prices and costs in different geographic areas.

NPPF: National Planning Policy Framework (2019) a document which sets out Government policy in relation to planning in England.

Open market value: The value a property might reasonably fetch if sold on the open market where there is a willing buyer and a willing seller.

Overage: see clawback above.

Planning Obligation: A legal agreement entered into under section 106 of the town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Planning Practice Guidance (PPG): An online resource that sets out the government's planning guidance on a range of planning issues.

Registered providers (RPs): Defined in section 80 of the Housing and Regeneration Act (2008), registered providers include local authority landlords and private registered providers (such as not-for-profit housing associations and for-profit organisations).

Residual land value: This is the amount that the developer can afford to pay for the development site, once all reasonable costs have been met.

Section 106 Agreement: See '*Planning Obligation*'

Shared Equity: The purchaser acquires the whole of the property but effectively only pays a proportion of the value; the remaining value is secured by an equity loan. There have been, and are a variety of schemes available, some with Government support.

Shared Ownership: Shared ownership is a mechanism for purchasing a property for those who cannot afford full home ownership. A percentage of the equity is purchased by means of deposit and mortgage. The retained equity is held by an Affordable Housing Provider (or similar). The owner takes out a lease and pays rent on the retained equity. Owners can usually purchase further shares of the property over time – this is known as “staircasing”.

Supplementary Planning Documents (SPD): Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Viability: In planning terms relates to the assessment of a development scheme to establish that favourable conditions regarding the financial aspects will enable development to proceed

Appendix 1- Financial Viability Appraisals (FVAs)

Any Development Viability Appraisal submitted in support of a developer's case for reviewing or reducing planning obligations identified as necessary by the Council, should contain the following information and data as a minimum.

All information and data should be evidenced from an independent RICS-qualified expert or a reliable and reputable source in relation to secondary data.

Figures included within the appraisal should be benchmarked.

1. Methodology used for the appraisal and details of any appraisal software or toolkits used.
2. Land values, both current and at the time of purchase (if different)
3. Price paid for the land; & costs taken into account when arriving at the price paid for the land (if the land is not owned by the applicant – details of any option agreements or agreements to purchase)
4. Gross and net area of development
5. Number, size and type of units
6. Build costs (per square metre) (and comparison with appropriate with appropriate published RICS data)
7. Abnormal or exceptional costs not reflected in the land value/price (Note: All abnormal and exceptional development costs should be supported by robust and costed specialist reports, including full technical data to support the stated costs)
8. Costs associated with bringing a heritage asset back into beneficial use or enabling development and/or costs of repairs (Note: all such costs should be supported by robust and costed specialist reports, including full technical data to support the stated costs)

9. Other costs (design, legal, consultants, planning etc.)
10. Cost of any other planning obligations including infrastructure requirements and financial contributions
11. Build programme and phasing
12. Interest rates, cap rates, loan costs, cash flows
13. Developer's profit and an explanation of its make up, and any company or financiers requirements
14. Anticipated phasing
15. Marketing and legal costs (and as a % of GDV)
16. Anticipated sales price for each unit type, and current assumed value of each unit type
17. Anticipated phasing of sales
18. Ground rents and services charges payable
19. Attach evidence of engagement with affordable housing providers

20. Anticipated price to be paid by the affordable housing provider, and the assumption on which this is based.
21. Substitution values and revenues for less or no affordable housing on site

Depending on individual site circumstances, further information may be required, including:

22. Developer's Market Analysis Report
23. Details of company overheads
24. Copy of financing offer/letter
25. Copy of cost plan
26. Board Report on scheme
27. Letter from Auditors re: land values and write offs
28. Sensitivity analysis showing different assumption options (e.g. low, medium & high)
29. For mixed use schemes similar information and data will be required on the non-residential uses.

Appendix 2 - Template Affordable Housing Section 106 Agreement

1. Definitions

It is hereby agreed between the parties to this Deed that the following expressions have the following meanings:

<p>“Act”</p>	<p>means the Town and Country Planning Act 1990 (as amended);</p>
<p>“Affordable Housing”</p>	<p>means Social Rented Housing Dwellings, Affordable Rented Housing Dwellings and Shared Ownership Housing Units (as hereinafter defined) provided to specific eligible households whose needs are not met by the market and Affordable Housing shall:</p> <p>(a) Meet the needs of eligible households the Council could reasonably expect to occupy this Development having regard to its Allocation Scheme including availability at a cost low enough for them to afford; and</p> <p>(b) Include provisions for the homes to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision subject to any such recycling of subsidy being in accordance with the requirements of Homes England:</p>
<p>“Affordable Housing Dwellings”</p>	<p>means [] Residential Units which are to be constructed pursuant to the Planning Permission and which are to be occupied as Affordable Housing in accordance with the Affordable Housing Scheme and “Affordable Housing Dwelling” is any of the Affordable Housing Dwellings capable of separate Occupation;</p>
<p>“Affordable Housing for Rent”</p>	<p>means housing that is either Affordable Rented Housing Dwellings or Social Rented Housing Dwellings, (including service charges where applicable);</p>

“Affordable Housing Scheme”	means the provision of [] Affordable/Social Rented Housing Dwellings comprising [] x [] bed flats/houses and [] Shared Ownership/affordable home ownership Dwellings comprising [] x [] bed/flats/houses;
“Affordable Rented Housing Dwelling”	means Affordable Housing let by a local authority or private Registered Provider of social housing to households who are eligible for social rented housing where the rent level is capped at Eighty Percent (80%) of the Local market rent (including any service charges, where applicable) and within Local Housing Allowance rates.
“Application”	means the [full/outline] application for Planning Permission dated [] given planning reference number RU.[] with a description of the Development for the erection of [];
“CIL Regulations”	means the Community Infrastructure Levy Regulations 2010 (as amended);
“Collecting Authority”	means Hampshire County Council who is the local authority appointed by Natural England to collect the SAMM Contribution;
“Commencement Date”	means the date of Commencement of Development;
“Commencement of Development”	means the carrying out of a Material Operation in respect of the Development and the words “Commence Development” and “Development Commences” shall be construed accordingly and in accordance with Section 56 (1) of the Act;
“Community Facilities Contribution”	means a sum of £[] ([]) to be paid to the Council as a contribution towards [];
“Council’s Contributions”	means the [SAMM Contribution and the SANG Contribution]
“County Council Contributions”	means the [contributions that are payable to the County Council]

“Design SPD	means the Runnymede Design Supplementary Planning Document adopted by the Council on 15 July 2021;
“Development”	means the development of the Site pursuant to the Planning Permission;
“First Homes”	means a Residential Unit which may be disposed of as a freehold or (in the case of flats only) as a leasehold property to a First Time Buyer at the Discount Market Price and which on its first Disposal does not exceed the Price Cap;
“Help to Buy Agent”	means such Registered Provider or such other organisation chosen from time to time by Homes England and its successors to register applicants for Shared Ownership Housing Dwellings in the Borough of Runnymede;
“Highways Agreement”	means an agreement under section 278 of the Highways Act 1980 (as amended);
“Highways Improvement Contribution”	means the sum of £ [] ([]) to be paid to the County Council as a contribution towards the provision of the Highway Works;
“Highway Works”	means [];
“Homes England”	means the national housing and regeneration agency formed pursuant to the Housing and Regeneration Act 2008 and shall include any statutory successor;
“Index”	means in regard to the Council the All-Items Index of Retail Prices issued by the Office for National Statistics and in regard to the County Council the [];
“Index-Linked”	means that with reference to the Council Contributions and the County Council Contributions the payment of such sums shall be uplifted to the extent of being Index-Linked by reference to the Index in accordance with the formula set out at Schedule [] of this Deed;

“Interest Rate”	means four per cent (4%) per annum above the Bank of England base rate such interest to be apportioned on a daily basis;
“Local Housing Allowance”	Local Housing Allowance (LHA) rates are used to calculate housing benefit for tenants renting from private landlords and are based on private market rents being paid by tenants in the broad rental market area as determined by the Valuation Office;
“Material Operation”	<p>means a material operation pursuant to Section 56(4)(a)-(e) of the Act provided that a Material Operation shall be deemed not to have taken place for the purposes of this Deed and for no other purpose:</p> <ol style="list-style-type: none"> (1) Site Investigation, (2) Demolition, (3) Site Clearance; (4) Archaeological investigation, (5) The assessment of contamination (6) Remedial Action in respect of any contamination, (7) Ecological mitigation, investigative survey and remedial measures, (8) Construction of temporary access roads, (9) Service diversions, and (10)The provision of temporary services or the erection of any hoardings or fences around the site.
“Monitoring Fee”	means the sum of [] (£) payable to the Council for monitoring compliance with the provisions and obligations included herein;

“Natural England”	means the statutory body established by the Natural Environment and Rural Communities Act 2006 which has responsibility for the promoting nature conservation and the protection of biodiversity;
“Nomination Agreement”	<p>[means an agreement substantially in the form of the Draft Agreement attached at the [] Schedule and to be entered into between the Council and the Registered Provider which governs the Council’s nomination rights for Occupation of the Affordable Housing Dwellings and which will:</p> <ul style="list-style-type: none"> (a) Provide for the Council to have nomination rights to all initial and subsequent vacancies of Affordable Housing for Rent in accordance with the Council’s Housing Allocation Scheme in force at the relevant time; (b) Require the Registered Provider not to unreasonably refuse a tenancy to a Nominee put forward by the Council; (c) Set out the arrangements for the selection of purchasers of affordable home ownership properties in accordance with the Council’s requirements; and (d) Refer to the Council’s tenancy strategy, the Council’s Housing Allocation Scheme and any Local Lettings Plan which is put in place for the Development;
“Nominee”	means a person who is selected by the Council and who is eligible for and in need of Affordable Housing;
“Occupation”	means occupation for the purposes permitted by the Planning Permission but not including occupation by personnel engaged in construction, fitting out or decoration or occupation for marketing or display or occupation in relation to security operations and "Occupied" shall be construed accordingly;
“Occupation Date”	means the date of Occupation of the [] Residential Units;

“Occupation Notice”	means the written notice confirming the Occupation Date referred to in clause [] and served in accordance with clause [] herein;
“Open Market Units”	means those dwellings which are not Affordable Housing Dwellings;
“Plan”	means the plan attached hereto and marked “Plan” which delineates the extent of the Site;
“Planning Permission”	means the planning permission granted pursuant to the Application for Planning Permission;
“Protected Occupier”	<p>means a Nominee or other eligible person who:</p> <ul style="list-style-type: none"> a. has exercised the right to acquire pursuant to the Housing Act 1996 or any statutory provision for the time being in force (or any equivalent contractual right) in respect of a particular Affordable Rented Housing Dwellings; or b. has exercised any statutory right to buy (or any equivalent contractual right) in respect of a particular Affordable Housing Dwellings; or c. has been granted a shared ownership lease by a Registered Provider (or similar arrangement where a share of the Affordable Housing Dwelling is owned by the tenant and a share is owned by the Registered Provider) and the tenant has subsequently purchased from the Registered Provider all the remaining shares so that the tenant owns the entire Affordable Housing Dwelling;
“Registered Provider”	means a social landlord registered with the Regulator of Social Housing (“RSH”) under Chapter 3 of Part 2 of the Housing and Regeneration Act 2008 (as amended) or its successors and approved by the Council;

“Residential Unit”	means any dwelling to be constructed on the Site pursuant to the Planning Permission and “Residential Units” shall be construed accordingly;
“SANG”	means the existing suitable alternative natural green-space within the Borough of Runnymede;
“SANG Contribution”	means the amount of [] (£) (which for the avoidance of doubt is the sum of Nine Hundred and Three Pounds and Fifty Pence (£903.50) per net additional occupant as set out in the Strategy x [] () which is the occupancy rate based on the number of net additional bedroom(s) developed on the Site as stated in the Strategy), to be paid to the Council by the Developer and/or the Owner(s) as a contribution towards the cost of facilitating upgrading and maintaining the SANGS in accordance with the Strategy;
“Shared Ownership Housing Dwelling”	means units let, leased or disposed of to households referred through the Help to Buy Agent System or if a household is not nominated through the Help to Buy Agent System to households selected in accordance with the Council’s selection criteria and where a percentage share of the equity is made available for sale and where the remaining percentage is retained by a Registered Provider who may charge an annual rent of not more than 2.75% of the value of the unsold equity and who will make the unsold equity available for sale to the occupant at market value if requested by the occupant;
“Site Allocation Plan”	means the plan annexed to this Deed at Schedule 4 headed “Site Allocation Plan”;
“Site Layout Plan”	means the plan annexed to this Deed at Schedule 4 headed “Site Layout Plan” showing the Application Site edged red;
“Social Rented Housing Dwelling”	means the Affordable Housing Dwellings provided by Registered Providers to households who are eligible for social rented housing, and for which guideline target rents are determined through the national rent regime;

<p>“SPA”</p>	<p>means the Thames Basin Heaths Special Protection Area classified as a special protection area in accordance with the European Commission Directive on the conservation of wild birds (79/409/EEC) on 9 March 2005;</p>
<p>“Strategic Access Management and Monitoring Contribution”</p>	<p>means the amount of [] (£) calculated on the basis of Three Hundred and Sixty Pounds (£360) per net additional occupant as set out in the Strategy x [] () (the occupancy rate based on the number of net additional bedrooms developed on the Site (as stated in the Strategy) to be paid to the Council by the Owner as a contribution towards monitoring the effectiveness of the SANG in accordance with the Strategy, (hereinafter referred to as the “SAMM Contribution”);</p>
<p>“Strategy”</p>	<p>means the Thames Basin Heaths Special Protection Area Supplementary Planning Document adopted by the Council on the 14th April 2021;</p>
<p>“Travel Plan”</p>	<p>means [];</p>
<p>“Travel Plan Monitoring Contribution”</p>	<p>means the sum of £[] ([]) to be paid to the County Council as a contribution towards the future auditing monitoring and management of the Travel Plan;</p>

COVENANTS WITH THE BOROUGH COUNCIL

Part 2: Affordable Housing

The Owner covenants with the Council:

It will provide the Affordable Housing in accordance with the Affordable Housing Scheme.

The Affordable Housing Dwellings shall be built in accordance with any relevant national standard in place from time to time **PROVIDED ALWAYS** that such requirements are not inconsistent with the Planning Permission or the Council’s Design SPD.

In the case of the Affordable Housing for Rent they shall not be Occupied until the Owner has entered into a Nominations Agreement with the Council in respect of each Affordable Housing for Rent.

To Practically Complete and to make available for Occupation the Affordable Housing Dwellings prior to the Occupation of more than Seventy Five Percent (75%) of the Open Market Units.

Subject to paragraphs 2.1(f) and 2.1(g), to ensure the future retention and availability of the Affordable Housing for Rent as Affordable Housing in perpetuity (subject to paragraphs 2.1(h) and 2.1.(i)) and if the Owner intends to dispose of their interest in any of the Affordable Housing Dwellings they will use reasonable endeavours to ensure that the Affordable Housing Dwellings are sold leased or otherwise disposed of to a Registered Provider on the list attached at the [] Schedule.

If the Owner is unable to enter into a contract for the disposal of the Affordable Housing Dwellings to one of the Council's preferred partner Registered Providers despite having used all reasonable endeavours so to do within Four (4) months from the Commencement Date the Owner may propose another Registered Provider or Registered Providers to the Council for their approval (such approval not to be unreasonably withheld or delayed) and the Owner shall use reasonable endeavours to enter into a contract for the disposal of the Affordable Housing Dwellings to the Registered Provider's so approved.

If the Owner is unable to enter into a contract for the disposal of the Affordable Housing Dwellings to one of the Registered Providers listed in the [] Schedule or the other Registered Provider's approved in accordance with paragraph 2.1(f) despite having used reasonable endeavours so to do within Six (6) months of the Commencement Date then the Owner may enter into a contract for the disposal of the Affordable Housing Dwellings to any Registered Provider of its choosing.

The covenants set out in this Schedule shall not be binding or enforceable against any Protected Occupier or any mortgagee or chargee of the Protected Occupier or any person deriving title from the Protected Occupier or any receiver appointed by any mortgagee or chargee or any successors in title thereto and their respective mortgagees and chargees SAVE THAT if any successor in title to the Protected Occupier is a Registered Provider or any other provider of affordable housing the provisions of paragraph 2.1(e) shall thereupon once again become enforceable against the said Registered Provider or other provider of affordable housing and their successors in title subject as provided herein.

The covenants set out in this Schedule shall not be binding or enforceable against any mortgagee or chargee of a Registered Provider or any receiver (including an administrative receiver) appointed by any such mortgagee or chargee or any person appointed under any security documentation to enable such mortgagee or chargee to realise its security or any administrator (howsoever appointed) (each a "Receiver") of the whole or any part of the Affordable Housing Dwellings or any persons or bodies deriving title through such mortgagee or chargee or Receiver or any successors in title thereto and their respective mortgagees and charge PROVIDED THAT a mortgagee charge or Receiver acting pursuant to any event of default shall first give written notice to the Council of its intention to dispose of the Affordable Housing Dwelling and shall have used reasonable endeavours over a period of Three (3) months from the date of the written notice to dispose of the Affordable Housing Dwelling to another Registered Provider or to the Council for a consideration not less than the amount due and outstanding to the mortgagee under the terms of the mortgage or charge including all accrued principal monies interest and costs and expenses incurred by the mortgagee in respect of the mortgagee or charge and if such disposal has not been completed with Three (3) month period [as set out above] the mortgagee charge or Receiver shall be entitled to dispose of the Affordable Housing Dwelling free from the restrictions and covenants contained in this paragraph [] and Part 2 of the Third Schedule SAVE THAT if any successor in title to the mortgagee or chargee is a Registered Provider or any other provider of affordable housing the provisions of this Schedule shall thereupon once again become enforceable against

the said Registered Provider or other provider of affordable housing and their successors in title subject as provided herein.

The transfer of the Affordable Housing for Rent to the Registered Provider pursuant to this Schedule shall contain the following:-

the grant by the Owner to the Registered Provider of all rights of access and passage of other services and other rights reasonably necessary for the beneficial enjoyment of the Affordable Housing Dwellings provided that such rights shall not materially interfere with the construction sale and occupation of the Development and its good estate management;

A reservation of all rights of access and passage of services and rights of entry and rights of support reasonably necessary for the purpose of the Development (including its construction);

A requirement for the Registered Provider to pay a fair and reasonable service charge for the provision of services to the Development which will be enjoyed by the occupiers of the Affordable Housing Dwellings (whether exclusively or in common with others);

And such other terms as the Owner may agree with the Registered Provider.

The mix of Residential Units shall be as stated in the Affordable Housing Scheme or such other mix as may be agreed in writing between the Council and the Owner.

Appendix 3- Methodology for calculating the commuted sum payment needed in-lieu of providing affordable housing on-site

Methodology for calculating the commuted sum payment needed in-lieu of providing affordable housing on-site

Report produced for and on behalf of the Runnymede Borough Council

15 March 2022



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Annex 3 - Appraisals Showing an Affordable Housing Shortfall

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Giving a Residual Land Value Output

Annex 4 - Appraisals Affordable Housing Shortfall Off Site

Giving a Residual Land Value Output

Introduction

1.1 BPS Chartered Surveyors has been instructed by the Council to consider a methodology for computing payments in lieu of on-site affordable housing delivery. In accordance with the client brief, the methodology for calculating the payment must accord with CIL Regulation 122 and para. 57 of the NPPF.

1.2 This report looks at a method whereby a contribution can be defined in cash terms in circumstances where, for accepted reasons, a development cannot provide on-site delivery of affordable housing.

1.3 The approach considered by this report is equally capable of defining a maximum contribution or ceiling to any in lieu payment by reference to the requirements of Runnymede 2030 Local Plan Adopted 16th July 2020 Policy SL20: Affordable Housing which is extracted in part below:

Development proposals of 10 or more (net) additional dwellings will be expected to provide 35% of dwellings as affordable units with a tenure split as above which includes 10% of homes for affordable home ownership (starter homes, discounted market sales housing and/or other products which provide affordable routes to home ownership in line with the definition contained in the 2019 NPPF)

1.4 The intention is that the methodology explored through this report will be included within an Affordable Housing Supplementary Planning Document (SPD) in the form of a user guide.

1.5 This report explores an approach which is based on a comparison of two appraisals:

Appraisal 1 - being an all private appraisal of the proposed application scheme

less

Appraisal 2 - an appraisal of a policy compliant scheme

1.6 The difference in scheme residual values represents the totality in cash terms of the viability impact of meeting the requirements of SL20 in full, thus representing the contributions cap.

1.7 Where schemes have been viability tested, and it is agreed that a lesser contribution is commensurate with viability, the approach is slightly modified as follows:

Appraisal 1 - being an all private appraisal of the proposed application scheme

less

Appraisal 2 - an appraisal of the viability tested proposed scheme (assuming on site affordable delivery)

1.8 This approach identifies the difference in the respective residual values of the two

appraisals as the payment in lieu of on-site delivery.

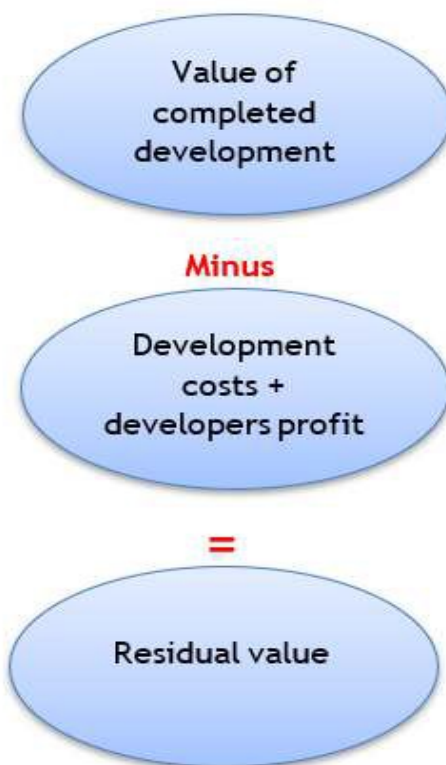
- 1.9 This report summarises the findings of appraisal modelling to test the above approach. Given the recent date of the Local Plan's adoption we have utilised the typologies tested as part of the Plan's viability evidence base and utilised, where relevant, the assumptions as presented within the evidence base documents.
- 1.10 For the purposes of modelling the approach we have tested valuation scenarios assuming developments which are capable in financial terms of delivering policy compliance and then re-run the same appraisals with an assumed shortfall of on-site delivery to compute the payment in-lieu.
- 1.11 The intention of this modelling is to demonstrate that the approach proposed is anchored to the viability of the development proposed and reflects the viability of that development when computing the in-lieu sum

Approach

- 2.1 The approach taken with the initial modelling has followed the typologies used to inform the Local Plan namely the Runnymede A320 Impact and Longcross Garden Village Viability Study September 2019.
- 2.2 This document was the most up to date of the documents touching on viability for the Local Plan. It adopted a hypothetical approach to valuing a notional hectare of land in nine separate locations. It also considered site specific viability in relation to a number of strategic sites. For the purposes of this report, only the typologies have been adopted and recreated. This is considered to be sufficiently representative of the methodology and does not add complexity arising from consideration of site-specific appraisal inputs associated with the modelling of strategic sites.
- 2.3 In simple terms the appraisals have been recreated but adjusted to show a breakeven position by absorbing all apparent surpluses into an inflated land price. This provides the baseline for comparison with a scenario based on the same hypothetical development, but which assumes they cannot deliver policy compliance on site. For example, they may be able to justify a lack of demand from a Registered Provider. The approach then compares the residual value of the policy compliant scheme to the residual value of the scheme delivering the shortfall on affordable housing. The gap between the two residual values represents the in-lieu contribution.
- 2.4 To test whether this approach generates enough money to deliver affordable housing on a site within the local area, a further appraisal has been run adopting the same construction costs and values, but only for the units of affordable which have been omitted under the shortfall scenario. The aim is to test whether the contribution sum provides sufficient funding to meet the costs of development and fund the acquisition of land at broadly the same level as generated by the policy compliant residual appraisal.

Step 1.

- 2.5 The Local Plan Study undertakes a number of residual valuations of each of the nine sites. Residual valuations are usually used to derive the amount which can be paid for land and they follow a common methodology shown below:

STAGE 1.**STAGE 2.**

- 2.6 For Local Plan testing the residual value is then compared to a benchmark land value to establish whether the development produces a surplus or deficit. Where deficits are identified the scale of planning obligations is then reduced until the residual value is equal or greater than the benchmark land value.
- 2.7 The Local Plan study adopted a benchmark land value of £2,000,000 per hectare for each of the nine sites in each of the following locations:
- Wentworth
 - Virginia Water
 - Engelfield Green
 - Ottershaw
 - Woodham
 - Chertsey
 - Egham
 - Addelstone
 - Staines

-
- 2.8 All of the appraisals showed a surplus when assuming affordable housing delivery of 11 units from a total of 30 units equating to 36%. To test a possible method for establishing the contributions CAP the 9 appraisals have been recreated in Argus Developer using identical assumptions to the Local Plan Study.
- 2.9 To illustrate the approach, adopted hard copy versions of the appraisals have been inserted as annexures. Given the numbers of appraisals involved examples have been included from three areas, these being:
- Egham
- Ottershaw
- Wentworth
- 2.10 It can be seen that each of the appraisals shows a surplus expressed in terms of the net profit output (circled red on the appraisals), noting that the 20% of GDV profit target is already embedded as a cost (circled in green) as is the £2m land value. (see Annex 1)

Step 2.

- 2.11 Each of the appraisals has then been reworked. Instead of inputting a land cost of £2m the appraisal has been reconfigured to allow for a fixed developer profit and a residual land value (RLV). This reflects the position where the price paid for land was increased to the point where there was no surplus after allowing for profit.
- 2.12 In effect this step assumes that any surplus over and above the developer profit target would translate in practice to a high payment for land, therefore the more viable appraisals show a higher residual land value. This step is considered reasonable noting that higher residential value areas would expect to generate higher land values. The results are summarised below:

	Assumes residual land cost	Based on residual land cost	
	RLV	Land price per unit	Land price per MKT Unit
Wentworth	£13,894,625	£463,154	£731,296
Virginia Water	£6,054,793	£201,826	£318,673
Engelfield Green	£4,326,422	£144,214	£227,706
Ottershaw	£3,866,071	£128,869	£203,477
Woodham	£3,303,786	£110,126	£173,883
Chertsey	£3,070,962	£102,365	£161,630
Egham	£3,052,356	£101,745	£160,650
Addelstone	£2,486,762	£82,892	£130,882
Staines	£2,384,130	£79,471	£125,481

- 2.13 It can be seen, from the table above, that the RLV can be broken down to a land cost per unit (based on 30 units in each scenario) and a land cost based just on the market units (23 units) assuming there is a nil land cost contribution from the 11 affordable units. Reporting land cost on these approaches is relevant in terms of the analysis shown later on.
- 2.14 Again, three sample appraisals have been set out in the annexures. The residual value is highlighted circled in red and the profit allowance in green. The appraisal is effectively identical to the Local Plan appraisal but instead of showing a surplus the appraisals show a breakeven position through reflecting the previous surplus within an increased land value.

Step 3.

- 2.15 To test the approach outlined in this document, it is necessary to compare the residual value generated from an appraisal of the application scheme (assuming it offers a shortfall in on site delivery) to an equivalent development delivering policy compliance. The difference between the two appraisals representing the contributions cap.
- 2.16 To do this using the Local Plan appraisals we have run the same appraisals but reduced the affordable housing delivered. We have recreated all 9 appraisals modelling a shortfall from the Local Plan affordable housing assumptions of 11 units to deliver 7 units. The lost affordable units have been replaced with additional market units. This approach attempts to model a situation where the applicant is able to provide a case for reduced on site delivery.
- 2.17 A comparison of unit tenures is shown below:

Local Plan (Policy Compliant)

	1 bed	2 bed	3 bed	4 bed	Total
market housing	1	6	8	4	19
AR	2	2	1	0	5
SR	1	1	1	0	3
SO	1	0	0	0	1
Starter	1	0	0	0	1
Discount	1	0	0	0	1

Shortfall Scenario

	1 bed	2 bed	3 bed	4 bed	Total
market housing	3	7	9	4	23
AR	2	2	1	0	5
SR	0	0	0	0	0
SO	1	0	0	0	1
Starter	1	0	0	0	1
Discount	0	0	0	0	0

- 2.18 The appraisals from the shortfall scenarios have then been re-run. Each appraisal is more viable than the policy compliant equivalents because there are fewer lower value affordable units and more higher value market units.
- 2.19 To record this the shortfall appraisals have been run on a residual land value basis. In effect additional viability is reflected in a higher residual land value output.
- 2.20 We have again identified the profit (in green) and the residual land value (in red) in the three examples shown in the annexes.

Step 4. Establishing the Payment CAP

2.21 This step compares the RLV of the Local Plan (fully policy compliant development) with the RLV of shortfall scheme for each of the 9 locations. The contributions cap being the difference between the two figures.

2.22 This is shown in the table below:

	RLV Local Plan	RLV Shortfall	Contributions CAP
Wentworth	£13,894,625	£15,789,919	£1,895,294
Virginia Water	£6,054,793	£6,987,457	£932,664
Engelfield Green	£4,326,422	£5,046,718	£720,296
Ottershaw	£3,866,071	£4,531,182	£665,111
Woodham	£3,303,786	£3,900,899	£597,113
Chertsey	£3,070,962	£3,639,658	£568,696
Egham	£3,052,356	£3,624,022	£571,666
Addelstone	£2,486,762	£2,985,683	£498,921
Staines	£2,384,130	£2,871,126	£486,996

Step 5.

2.23 The next step is to test whether the contribution cap sum identified above would be adequate to deliver the 4 affordable units omitted from the shortfall appraisals. The aim being that the CAP sum should be sufficient to meet both the development costs and the land cost associated with these units.

2.24 To undertake this test, we have followed two further sub steps.

Step a)

2.25 We have created 9 further appraisals for each of the locations modelling just the 4 units of affordable housing using the same cost and value rates as were used in the original policy compliant appraisals and run these on a residual value basis. The RLV should broadly match the same land value output on a per unit basis as identified in step 2 above.

2.26 As with all the other appraisals the 4 affordable units generate a value. To reach an RLV the development costs are deducted from the values

Step b)

2.27 The RLV from the appraisals whether positive or negative is added to the contributions cap sum to provide a net overall RLV. The net RLV is then divided by 4 to derive a land value per unit which can be directly compared to the land value per unit derived from the policy compliant appraisals as shown in Step 2 above.

2.28 The results are shown below:

	Net RLV of Shortfall Scheme	Contributions CAP (CC)	CC less RLV Shortfall Scheme	Land Price per Unit 4 unit appraisal	Land Price per Unit 30 unit appraisal	Difference on Local Plan Policy Compliant
Wentworth	£74,600	£1,895,294	£1,969,894	£492,474	£463,154	£29,319
Virginia Water	-£81,416	£932,664	£851,248	£212,812	£201,826	£10,986
Engelfield Gre	-£117,131	£720,296	£603,165	£150,791	£144,214	£6,577
Ottershaw	-£125,535	£665,111	£539,576	£134,894	£128,869	£6,025
Woodham	-£137,300	£597,113	£459,813	£114,953	£110,126	£4,827
Chertsey	-£142,369	£568,696	£426,327	£106,582	£102,365	£4,216
Egham	-£142,932	£571,666	£428,734	£107,184	£101,745	£5,438
Addelstone	-£153,636	£498,921	£345,285	£86,321	£82,892	£3,429
Staines	-£155,890	£486,996	£331,106	£82,777	£79,471	£3,306

2.29 We have again included the three example appraisals showing the 4 unit affordable only appraisals. The RLV is circled in red.

Conclusions

- 3.1 It can be seen that the land price per unit available from the Contributions CAP sum is slightly above the land price per unit established for the Local Plan compliant scenarios. This difference, although small, arises from the impact of interest on land costs and shows an excess rather than shortfall in land cost provision.
- 3.2 We have also set out in the table below a comparison with the land price per unit based just on the market unit analysis.

	Land Price per Unit 4 unit appraisal	Land price per MKT Unit	Difference on MKT unit Land Price
Wentworth	£492,474	£731,296	-£238,823
Virginia Water	£212,812	£318,673	-£105,861
Engelfield Gre	£150,791	£227,706	-£76,915
Ottershaw	£134,894	£203,477	-£68,583
Woodham	£114,953	£173,883	-£58,930
Chertsey	£106,582	£161,630	-£55,048
Egham	£107,184	£160,650	-£53,467
Addelstone	£86,321	£130,882	-£44,561
Staines	£82,777	£125,481	-£42,704

- 3.3 This analysis shows there is a shortfall on the land price per market unit, but this is not surprising as this analysis effectively assumes that only market units contribute a land value and therefore does not adopt an even spread of land cost across all units.
- 3.4 Overall, the analysis shows that the approach to establishing the contributions cap effectively follows the economics of the scheme being modelled and ensures that both an allowance for the actual costs of development are covered but also and importantly land costs associated with an off-site affordable provision. Also, that land costs are proportionate to the application scheme not a baseline which may become out of date over time.

Formula for the Computation of the Payment in Lieu

The following formula should be adopted when assessing the scale of cash contributions in lieu of on-site affordable housing contributions

$$(A - (B+C)) = RV 1 - RV 2 = (D - (B+C))$$

Where

A = The gross development value of the proposed scheme on an all-private housing assumption

B*1 = The costs associated with developing the proposed scheme including developer profit

C = The agreed benchmark land value

RLV 1 = the residual land value generated

D = The gross development value of the proposed viability tested scheme assuming on site affordable housing delivery

B*1 = The costs associated with developing the proposed scheme including developer profit

C = The agreed benchmark land value

*1 it should be noted that the profit allowance for market housing should remain consistent in calculating RV1 and RV2 but it is expected that a much lower profit assumption of circa 6% of GDV will be assumed in relation to affordable housing revenue assumed within RV2.

Notes

The above formula can be satisfied through the production of standard residual valuations. The basic approach is summarised below

Gross Development Value (GDV) of the proposed scheme

Less

Construction costs

Fees

Finance costs

developer profit

Land cost (this should follow NPPG requirements for an EUV plus or AUV based land value)

Marketing costs

S106 Contributions

=

Residual Value

The formula seeks to compare the residual value of an all-private scheme with the proposed scheme. The difference arising represents the payment in lieu.

Annex 1 - Policy Compliant Appraisals
Showing Local Plan Typologies

Egham 30 DPH
Fully compliant

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Market housing	19	479,368	9,108,000
Affordable housing	<u>11</u>	138,555	<u>1,524,100</u>
Totals	30		10,632,100

NET REALISATION **10,632,100**

OUTLAY

ACQUISITION COSTS

Fixed Price	2,000,000		
Fixed Price		2,000,000	2,000,000
Stamp Duty		89,500	
Effective Stamp Duty Rate	4.47%		89,500

CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost
Market housing	1,768	1,500.00	2,652,000
Affordable housing	<u>701</u>	1,500.00	<u>1,051,500</u>
Totals	2,469 ft²		3,703,500

PROFESSIONAL FEES

Professional fees	12.00%	444,420	444,420
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MARKETING & LETTING

Marketing	3.00%	318,963	318,963
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Additional Costs

Developer profit	20.00%	2,126,420	2,126,420
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		326,192	
Construction		339,565	
Total Finance Cost			665,756

TOTAL COSTS

9,348,559

PROFIT

1,283,541

Performance Measures

Profit on Cost%	13.73%
Profit on GDV%	12.07%
Profit on NDV%	12.07%
IRR% (without Interest)	18.36%
Profit Erosion (finance rate 6.750)	1 yr 11 mths

Ottershaw 30 DPH
Fully compliant

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Market housing	19	542,474	10,307,000
Affordable housing	<u>11</u>	145,459	<u>1,600,050</u>
Totals	30		11,907,050

NET REALISATION **11,907,050**

OUTLAY

ACQUISITION COSTS

Fixed Price	2,000,000		
Fixed Price		2,000,000	2,000,000
Stamp Duty		89,500	
Effective Stamp Duty Rate	4.47%		89,500

CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost
Market housing	1,768	1,500.00	2,652,000
Affordable housing	<u>701</u>	1,500.00	<u>1,051,500</u>
Totals	2,469 ft²		3,703,500

PROFESSIONAL FEES

Professional fees	12.00%	444,420	444,420
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MARKETING & LETTING

Marketing	3.00%	357,211	357,211
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Additional Costs

Developer profit	20.00%	2,381,410	2,381,410
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		326,192	
Construction		339,565	
Total Finance Cost			665,756

TOTAL COSTS **9,641,798**

PROFIT

2,265,252

Performance Measures

Profit on Cost%	23.49%
Profit on GDV%	19.02%
Profit on NDV%	19.02%
IRR% (without Interest)	26.77%
Profit Erosion (finance rate 6.750)	3 yrs 2 mths

Wentworth 30 DPH
Fully compliant

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Market housing	19	1,346,526	25,584,000
Affordable housing	<u>11</u>	193,927	<u>2,133,200</u>
Totals	30		27,717,200

NET REALISATION **27,717,200**

OUTLAY

ACQUISITION COSTS

Fixed Price	2,000,000		
Fixed Price		2,000,000	2,000,000
Stamp Duty		89,500	
Effective Stamp Duty Rate	4.47%		89,500

CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost
Market housing	1,768	1,500.00	2,652,000
Affordable housing	<u>701</u>	1,500.00	<u>1,051,500</u>
Totals	2,469 ft²		3,703,500

PROFESSIONAL FEES

Professional fees	12.00%	444,420	444,420
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MARKETING & LETTING

Marketing	3.00%	831,516	831,516
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Additional Costs

Developer profit	20.00%	5,543,440	5,543,440
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		326,192	
Construction		339,565	
Total Finance Cost			665,756

TOTAL COSTS **13,278,132**

PROFIT

14,439,068

Performance Measures

Profit on Cost%	108.74%
Profit on GDV%	52.09%
Profit on NDV%	52.09%
IRR% (without Interest)	106.56%
Profit Erosion (finance rate 6.750)	10 yrs 12 mths

Annex 2 - Policy Compliant Appraisals
Showing Local Plan Typologies
Giving a Residual Land Value Output

Egham 30 DPH
Fully compliant

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Market housing	19	479,368	9,108,000
Affordable housing	<u>11</u>	138,555	<u>1,524,100</u>
Totals	30		10,632,100

NET REALISATION **10,632,100**

OUTLAY

ACQUISITION COSTS

Fixed Price	3,052,356		
Fixed Price		3,052,356	<u>3,052,356</u>
Stamp Duty		142,118	
Effective Stamp Duty Rate	4.66%		142,118

CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost
Market housing	1,768	1,500.00	2,652,000
Affordable housing	<u>701</u>	1,500.00	<u>1,051,500</u>
Totals	2,469 ft²		3,703,500

PROFESSIONAL FEES

Professional fees	12.00%	444,420	444,420
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MARKETING & LETTING

Marketing	3.00%	318,963	318,963
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Additional Costs

Developer profit	20.00%	2,126,420	<u>2,126,420</u>
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		498,689	
Construction		339,565	
Total Finance Cost			838,253

TOTAL COSTS **10,626,030**

PROFIT

6,070

Performance Measures

Profit on Cost%	0.06%
Profit on GDV%	0.06%
Profit on NDV%	0.06%
IRR% (without Interest)	6.62%
Profit Erosion (finance rate 6.750)	0 mths

Ottershaw 30 DPH
Fully compliant

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Market housing	19	542,474	10,307,000
Affordable housing	<u>11</u>	145,459	<u>1,600,050</u>
Totals	30		11,907,050

NET REALISATION **11,907,050**

OUTLAY

ACQUISITION COSTS

Fixed Price	3,866,071		
Fixed Price		3,866,071	<u>3,866,071</u>
Stamp Duty		182,804	
Effective Stamp Duty Rate	4.73%		182,804

CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost
Market housing	1,768	1,500.00	2,652,000
Affordable housing	<u>701</u>	1,500.00	<u>1,051,500</u>
Totals	2,469 ft²		3,703,500

3,703,500

PROFESSIONAL FEES

Professional fees	12.00%	444,420	444,420
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MARKETING & LETTING

Marketing	3.00%	357,211	357,211
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Additional Costs

Developer profit	20.00%	2,381,410	<u>2,381,410</u>
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		632,069	
Construction		339,565	
Total Finance Cost			971,634

TOTAL COSTS **11,907,050**

PROFIT

0

Performance Measures

Profit on Cost%	0.00%
Profit on GDV%	0.00%
Profit on NDV%	0.00%
IRR% (without Interest)	6.59%
Profit Erosion (finance rate 6.750)	0 mths

Wentworth 30 DPH
Fully compliant

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Market housing	19	1,346,526	25,584,000
Affordable housing	<u>11</u>	193,927	<u>2,133,200</u>
Totals	30		27,717,200

NET REALISATION **27,717,200**

OUTLAY

ACQUISITION COSTS

Fixed Price	13,894,625		
Fixed Price		13,894,625	13,894,625
Stamp Duty		684,231	
Effective Stamp Duty Rate	4.92%		
			684,231

CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost
Market housing	1,768	1,500.00	2,652,000
Affordable housing	<u>701</u>	1,500.00	<u>1,051,500</u>
Totals	2,469 ft²		3,703,500
			3,703,500

PROFESSIONAL FEES

Professional fees	12.00%	444,420	444,420
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MARKETING & LETTING

Marketing	3.00%	831,516	831,516
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Additional Costs

Developer profit	20.00%	5,543,440	5,543,440
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		2,275,903	
Construction		339,565	
Total Finance Cost			2,615,467

TOTAL COSTS **27,717,200**

PROFIT

0

Performance Measures

Profit on Cost%	0.00%
Profit on GDV%	0.00%
Profit on NDV%	0.00%
IRR% (without Interest)	6.63%
Profit Erosion (finance rate 6.750)	0 mths

Annex 3 - Appraisals Showing an Affordable Housing Shortfall
Showing Local Plan Typologies
Giving a Residual Land Value Output

Egham 30 DPH
Shortfall 1

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Market housing	23	453,783	10,437,000
Affordable housing	<u>7</u>	158,529	<u>1,109,700</u>
Totals	30		11,546,700

NET REALISATION **11,546,700**

OUTLAY

ACQUISITION COSTS

Residualised Price		3,624,022	<u>3,624,022</u>
Stamp Duty		170,701	
Effective Stamp Duty Rate	4.71%		170,701

CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost
Market housing	2,040	1,500.00	3,060,000
Affordable housing	<u>438</u>	1,500.00	<u>657,000</u>
Totals	2,478 ft²		3,717,000

3,717,000

PROFESSIONAL FEES

Professional fees	12.00%	446,040	446,040
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MARKETING & LETTING

Marketing	3.00%	346,401	346,401
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		592,394	
Construction		340,802	
Total Finance Cost			933,196

TOTAL COSTS **9,237,360**

PROFIT

2,309,340

Performance Measures

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%
IRR% (without Interest)	21.45%
Profit Erosion (finance rate 6.750)	3 yrs 4 mths

**Ottershaw 30 DPH
Shortfall 1**

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Market housing	23	513,739	11,816,000
Affordable housing	<u>7</u>	165,836	<u>1,160,850</u>
Totals	30		12,976,850

NET REALISATION **12,976,850**

OUTLAY

ACQUISITION COSTS

Residualised Price		4,531,182	4,531,182
Stamp Duty		216,059	
Effective Stamp Duty Rate	4.77%		216,059

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost
Market housing	2,040	1,500.00	3,060,000
Affordable housing	<u>438</u>	1,500.00	<u>657,000</u>
Totals	2,478 ft²		3,717,000

3,717,000

PROFESSIONAL FEES

Professional fees	12.00%	446,040	446,040
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MARKETING & LETTING

Marketing	3.00%	389,306	389,306
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		741,091	
Construction		340,802	
Total Finance Cost			1,081,893

TOTAL COSTS **10,381,480**

PROFIT

2,595,370

Performance Measures

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%
IRR% (without Interest)	20.99%
Profit Erosion (finance rate 6.750)	3 yrs 4 mths

**Wentworth 30 DPH
Shortfall 1**

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Market housing	23	1,275,043	29,326,000
Affordable housing	<u>7</u>	200,057	<u>1,400,400</u>
Totals	30		30,726,400

NET REALISATION **30,726,400**

OUTLAY

ACQUISITION COSTS

Residualised Price		15,789,919	15,789,919
Stamp Duty		778,996	
Effective Stamp Duty Rate	4.93%		778,996

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost
Market housing	2,040	1,500.00	3,060,000
Affordable housing	<u>438</u>	1,500.00	<u>657,000</u>
Totals	2,478 ft²		3,717,000

3,717,000

PROFESSIONAL FEES

Professional fees	12.00%	446,040	446,040
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MARKETING & LETTING

Marketing	3.00%	921,792	921,792
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		2,586,571	
Construction		340,802	
Total Finance Cost			2,927,373

TOTAL COSTS **24,581,120**

PROFIT

6,145,280

Performance Measures

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%
IRR% (without Interest)	19.21%
Profit Erosion (finance rate 6.750)	3 yrs 4 mths

Annex 4 - Appraisals Affordable Housing Shortfall Off Site
Giving a Residual Land Value Output

Egham 30 DPH
Make Good

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Affordable housing	4	103,600	414,400

NET REALISATION **414,400**

OUTLAY

ACQUISITION COSTS

Residualised Price (Negative land)	(142,932)	(142,932)
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CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost
Affordable housing	263	1,500.00	394,500

PROFESSIONAL FEES

Professional fees	12.00%	47,340	47,340
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MARKETING & LETTING

Marketing	3.00%	12,432	12,432
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		(15,991)	
Construction		36,171	
Total Finance Cost			20,180

TOTAL COSTS **331,520**

PROFIT **82,880**

Performance Measures

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%
IRR% (without Interest)	67.45%
Profit Erosion (finance rate 6.750)	3 yrs 4 mths

**Ottershaw 30 DPH
Make Good**

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Affordable housing	4	109,800	439,200

NET REALISATION **439,200**

OUTLAY

ACQUISITION COSTS

Residualised Price (Negative land)	(125,535)	(125,535)
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CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost
Affordable housing	263	1,500.00	394,500

PROFESSIONAL FEES

Professional fees	12.00%	47,340	47,340
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MARKETING & LETTING

Marketing	3.00%	13,176	13,176
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FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)			
Land		(14,292)	
Construction		36,171	
Total Finance Cost			21,879

TOTAL COSTS **351,360**

PROFIT **87,840**

Performance Measures

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%
IRR% (without Interest)	47.86%
Profit Erosion (finance rate 6.750)	3 yrs 4 mths

**Wentworth 30 DPH
Make Good**

Appraisal Summary for Phase 1

Currency in £

REVENUE

Sales Valuation	Units	Unit Price	Gross Sales
Affordable housing	4	183,200	732,800

NET REALISATION **732,800**

OUTLAY

ACQUISITION COSTS

Residualised Price	74,600
	74,600

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost
Affordable housing	263	1,500.00	394,500
			394,500

PROFESSIONAL FEES

Professional fees	12.00%	47,340
		47,340

MARKETING & LETTING

Marketing	3.00%	21,984
		21,984

FINANCE

Debit Rate 6.750%, Credit Rate 0.000% (Nominal)		
Land		11,646
Construction		36,171
Total Finance Cost		47,816

TOTAL COSTS **586,240**

PROFIT **146,560**

Performance Measures

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%
IRR% (without Interest)	25.14%
Profit Erosion (finance rate 6.750)	3 yrs 4 mths

All enquiries about this paper should be directed to:

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www.runnymede.gov.uk

2022

**AFFORDABLE HOUSING
SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

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

REGULATION 12 STATEMENT OF CONSULTATION

**Includes the results of Public Consultation and the
subsequent Summary of Changes made to the SPD.**

April 2022

Consultation Statement for the Affordable Housing Supplementary Planning Document (SPD)

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Introduction

1. This Consultation Statement outlines the ways in which stakeholders have been engaged during the preparation of the Affordable Housing Supplementary Planning Document (SPD).
2. In line with Regulation 12 of the Town and Country Planning (Local Planning) (England) 2012 regulations and with the Runnymede Statement of Community Involvement (5th March 2021), this statement provides details of:
 - (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.
3. Runnymede Borough Council formally consulted on a draft version of the Affordable Housing SPD over eight weeks from 1st December to 25th January 2022. This consultation was considerably longer than the statutory four-week requirement, to allow for the fact that the consultation took place over the Christmas period.
4. This consultation statement has been updated to reflect the feedback received and how this has been taken into account in the final version of the SPD (see Table 2 below). In addition, other changes have also been made to the SPD, mainly of a minor and editorial nature, and these are set out in more detail in Table 3 of this Statement together with the reasons for these changes. This final consultation statement will be published alongside the SPD for adoption.

Background

5. The cost of housing accommodation in Runnymede Borough is high. Median house prices in the Borough are nearly 10 times median gross annual workplace-based earnings¹. The average price for a property in Runnymede in May 2021 stood at £434,562, according to HM Land Registry data.
6. To address this issue, the Runnymede 2030 Local Plan includes Policy SL20: Affordable Housing, which requires that affordable housing be provided on all sites that result in a net gain of 10 or more (net) dwellings. This SPD sets out in more detail how the affordable housing policy will be implemented through the planning process.

¹ Median workplace-based affordability ratios (Table 5c) 1997-2020 Officer for National Statistics

7. The SPD does not include new policies and does not form part of the Council's Development Plan. However, once adopted, the SPD will form a material consideration in the determination of planning applications.

SPD preparation and early stakeholder involvement in the draft SPD

8. The draft Affordable Housing SPD was prepared following a review of the previous Runnymede Affordable Housing Supplementary Planning Guidance (December 2007).
9. Officers initially scoped the content of the earlier SPD document. The sections to be included in the SPD were identified and then the best source of obtaining information on these various topic areas determined.
10. Officers also considered what additional issues have arisen that needed to be addressed within the updated SPD. Recent examples of Affordable Housing SPDs produced by other local authorities were also looked at to see if they covered any issues that would be beneficial to consider for Runnymede Borough.
11. In addition to the above, a number of presentations were given and meetings held to discuss the contents of the Affordable Housing SPD. In addition, stakeholders likely to have a particular interest in affordable housing delivery in the Borough were contacted directly about the SPD. Comments made on its contents are set out in Table 1 below together with the Council's response to the comments raised.
12. More specifically, the following early engagement on the draft Affordable Housing SPD was held:
 - A presentation was given on the proposed contents of the Affordable Housing SPD to the Housing and Enabling Working Party on 12th October 2021.
 - On the 14th October 2021, a member of the Planning Policy team attended the Runnymede Housing Development Partnership, in order to discuss the SPD with registered providers in the Borough.
 - A summary of the contents of the Affordable Housing SPD was sent out to 102 developers, agents, landowners and registered providers on the 14th October 2021, for a two-week consultation period.
 - A presentation was given on the proposed contents of the Affordable Housing SPD to the Infrastructure and Economic Development Working Party on 20th October 2021.

The comments made by attendees at these meetings are picked up in Table 1. Main Issues Raised and how these issues were addressed

13. Overall, the proposed content of the draft SPD was well-received, and the feedback was positive and constructive. More detailed points raised and the responses to them are set out below in Table 1.

Table 1: RBC response to main comments raised during period of early engagement on the Affordable Housing SPD

Contents of the informal draft SPD	Issues raised	Response
Affordable Housing Tenure	No mention is made of First Homes. Will this be addressed in the SPD	The initial intention was to include references to this new tenure in the SPD. However, this position has now changed (for the reasons set out below in Table 2) and the detail relating to the implementation of First Homes has been set out in an Interim Policy Statement on First Homes, which is available to view on the Council's website.
Commuted sums	The best way to calculate commuted sums in lieu of on-site affordable housing was discussed.	It was considered that a Commuted Sums calculator should be produced which sits alongside the AH SPD. This would allow applicants to calculate the commuted sum payment expected for their proposed development.
Preferred Registered Providers	Should this be in the SPD?	It was considered that it was helpful to provide this information but whilst the Council could encourage developers to work with these providers, it wasn't enforceable.
Nomination agreements and Local Lettings Plans	Would the SPD include templates of Nominations Agreements and Local Lettings Plans?	Whilst none of these templates are currently proposed to be included in the SPD, signposting to the Council's Housing team will be provided if an applicant needs further advice on these templates/ requirements.
Design of affordable housing	Does the SPD take into account parking for the affordable housing schemes?	The SPD sets out that parking for affordable housing schemes should meet the Council's current parking standards. The Council expects the same parking

		provision to be made available for affordable and market housing of the same size.
	Does the SPD include information about making developments more sustainable and net zero in particular?	The SPD includes a cross reference to the adopted Design SPD (June 2021) and also policy EE1: Townscape and Landscape Quality of the Local Plan, which sets out the criteria for achieving good urban design within the context of national advice. As far as net zero is concerned, that goes beyond the scope of the SPD in that its purpose is to provide guidance on existing policies in the adopted Local Plan and it cannot create new policy. This issue will therefore need to be picked up in the new Local Plan.
	Is there any cross referencing to the Thorpe Neighbourhood Plan Design Principles?	The draft SPD didn't originally include this cross-reference to the Thorpe Neighbourhood Plan and other emerging Neighbourhood Plans. The text of the draft SPD was therefore amended to reflect this point.
Viability	Can more be done to address this issue and ensure that affordable housing provision is maximised?	The draft SPD already included a section on Viability. However, in response to this issue this section was reviewed, and a number of changes made in order to try and ensure that the Council maximises its provision of affordable housing in the Borough.
	Has the Harrogate model, which is used to set transfer values for affordable housing land, been included in the SPD?	The Harrogate model is used as a means of setting transfer values for land for affordable housing. In order to be included in the SPD it would need to have been taken into account as part of the Viability

		Appraisal which underpinned the adopted Runnymede 2030 Local Plan. This wasn't the case and consequently as the SPD cannot set new policy this model cannot be included in the SPD but could be considered as part of the new Local Plan.
Planning Bill	Are the changes set out in the Planning White Paper and the proposed planning bill taken into consideration in the SPD?	No. It is unclear at this stage what those changes will be particularly with the recent change in Housing Ministers. However, the SPD will need to consider these changes prior to adoption and if they impact on issues such as the future of Section 106s or other factors that would impact on the contents of the SPD, further amendments to the SPD may be needed to reflect this.

SPD Formal Public Consultation responses

14. As set out above, formal public consultation took place on the draft Affordable Housing SPD between 1st December 2021 and 25th January 2022. Nine responses were received to the SPD.
15. People were made aware of the consultation through:
 - Notifying statutory consultees and generic and specific stakeholders on our consultation database.
 - Placing hard copies of the SPD in local libraries and the Council's Reception Area.
 - All of the consultation material was made available on the Council's website.
16. Table 2 below summarises the comments received to the public consultation and the Council's responses to them. It also outlines any changes made to the SPD as a result of these comments.

Table 2: Representations received to the Affordable Housing SPD and the Council’s response to them

Representor	Summary of Representation	Council’s Response	Amend SPD?
<p>Accent Housing Limited</p>	<p>First Homes – It appears allocated sites within the current plan will not be subject to First Homes. There’s not much information on what happens where there is a requirement for windfall sites.</p> <p>Issues for RP’s in delivering shared ownership with small numbers etc.</p> <p>First Homes are at a 30% discount but would Runnymede demand greater discounts if needed?</p>	<p>As First Homes are being introduced quickly by the Government and, as a result, the Council does not currently have evidence to include the full extent of local eligibility criteria in the Borough, it is considered that the position on First Homes in Runnymede should be set out in an Interim Policy Statement, as opposed to within this SPD. This will enable future updates to be made as and when more supporting evidence becomes available.</p> <p>The precise wording change is set out below in Table 3 for paras. 1.3.1 and 2.3.10.</p>	<p>Yes. Amend the SPD to remove references to the implementation of First Homes and instead refer the reader to the Council’s published Interim Policy Statement.</p>
	<p>Social / Affordable Rent. Is there a preferred rented tenure? Social or Affordable?. Given the high rental values in the district, surprised no cap e.g. 70% of Market Rent’s for Affordable Rent rather than the national 80%. Consider graded caps e.g. 80% for 1 beds down to 50% for 4 beds?</p>	<p>The purpose of the SPD is to interpret and provide guidance on existing policy. Policy SL20 of the adopted Local Plan doesn’t differentiate between social and affordable rent, as there is not sufficient evidence to do so. The SPD cannot therefore make this distinction. It is however hoped that more detailed evidence will be produced on this issue in the Housing and Economic Development Needs Assessment (HEDNA) as part of the evidence for the review of the Local Plan. It is intended that a more detailed approach to this issue will be included in the next iteration of the Local Plan.</p>	<p>No change.</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
	<p>Site maximisation. I can see pushback from developers as while RBC are wanting to maximise site density to meet affordable needs, they are citing nationally described space standards minimums for AH dwellings. Land availability / cost will be critical here so may see challenges around unit sizes.</p>	<p>This text is based on Policy SL19 of the adopted Local Plan so whilst there might be push back, if an applicant wants to secure planning permission they will need to take the requirements of policy SL19 into account.</p> <p>In term of land costs, it has been assumed that Accent Housing Ltd are referring to the Harrogate Model which, as referred to above on page 9, wasn't included in the Viability work that underpinned the Local Plan and consequently cannot be included in the SPD.</p>	<p>No change.</p>
	<p>Good to see same parking standards for AH as private.</p>	<p>Noted.</p>	<p>No change.</p>
	<p>Positive to see AH distributed throughout a site, to promote an inclusive, sustainable community.</p>	<p>Noted.</p>	<p>No change.</p>
	<p>It would be good to see reference in the SPD to local lettings plans being encouraged for the affordable homes, even it doesn't include a template .</p>	<p>The SPD is a planning document and is not therefore considered to be the right place for this level of detail on what is effectively a housing issue. Instead, a reference has been included in the SPD as to where to get additional housing templates.</p>	<p>Minor change.</p>
	<p>On the viability, although an open book viability assessment is expected, it goes on to open the</p>	<p>It will be for the Council to decide if the information contained in the report is commercially sensitive and therefore requires</p>	<p>Add additional text to para. 3.1.14 to clarify the limited circumstances in</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
	<p>door for the developer to redact some parts. I can see developers taking this opportunity!</p>	<p>redaction. It is suggested that additional wording (red text) is added to the SPD at para. 3.1.14</p> <p>Where a developer raises viability concerns in relation to contributions for an application, the Council will, as set out in the adopted Runnymede 2030 Local Plan, expect a full "open-book" viability assessment for the scheme, unless <u>in exceptional circumstances</u> the applicant can clearly demonstrate why parts <u>of the assessment are so commercially sensitive that it</u> must be redacted.</p>	<p>which developers may be able to withhold information from an open book appraisal.</p>
	<p>Interesting to see in the Regulation 12 statement that RBC can't include the 'Harrogate model' in the SPD, but it doesn't say whether this is being considered as a new policy separate to the SPD.</p>	<p>As set out above, in response to the comment on social/ affordable rent, the Council needs evidence to include a policy in a Local Plan. The Harrogate Model wasn't included in any of the evidence used to produce the Local Plan, and in particular, in the viability work underpinning the Plan. It cannot therefore be referred to within this SPD. The Harrogate Model would need to be included in the review of the Local Plan and its evidence before it can be included as a new policy separate to the SPD.</p>	<p>No change.</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
Egham Residents Association	<p>The Egham Residents' Association (ERA) empathise with the spirit and essence of this document.</p>	<p>The support from Egham Residents' Association in terms of the spirit and essence of this document is appreciated.</p>	<p>No change.</p>
	<p>The problem is of such a scale that action to solve it both quickly and fully seems utterly impossible without radical changes in attitude and policy. The implications are so serious, however, that a big drive to tackle and diminish the problem is a necessity. This document and the Runnymede 2030 Local Plan Policy SL20 (on 'affordable' housing), which it furthers, are steps in the right direction. But do they go far enough?</p>	<p>The scale of the problem is recognised by the Council. However, it is considered that within the existing policy regime in which the Council operates, we can only expect s106s from developers to provide a contribution towards increasing affordable housing (either by way of physical provision or through financial contributions in some exceptional circumstances), and through other initiatives being delivered by the Council's Housing Department. Other, more radical proposals to address affordability issues would need to be driven through policy changes at the national level.</p>	<p>No change.</p>
	<p>Are the affordable housing percentages included in Policy SL20 high enough in the prevailing circumstances, how can they be?</p>	<p>As set out above, s106s is one means of assisting with the problem, but they are certainly not going to address the problem in its entirety. We need to be realistic in setting these percentages and base them on a level that is considered viable for the Borough. The %s contained in the adopted Local Plan were</p>	<p>No change.</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
		informed by the viability evidence that underpinned the Local Plan and were balanced against the need for other policy requirements such as contributions to infrastructure provision in the Borough needing to be sought from new development.	
	Something that is missing from this SPD is evidence of how well or otherwise RBC has been doing so far in trying to meet the objectives set out in Local Plan Policy SL20. How much of the net additional housing in the borough since 2015 has been 'affordable'?	This information is in the Council's Annual Monitoring Report (AMR).	No change
	It is incumbent upon RBC itself to set a good example, we are also wondering how the non-student elements of the Gateway West (Magna Square) complex match up to what is laid down in SL20.	The documentation submitted with RU.19/0437 Land at High Street/ Station Road (North)/ Church Road Egham sets out that the non-student element of this application is for 108 dwellings of which 41 are affordable i.e. 38%. This is therefore above the requirement set out in Policy SL20 of the Local Plan.	No change
	It is a pity, moreover, that there is no acknowledgement in this SPD that housing provision in Egham (and beyond) has been seriously skewed by the expansion in Royal Holloway College student numbers.	Noted.	No change.

Representor	Summary of Representation	Council's Response	Amend SPD?
	ERA applauds the commitments in the SPD on design and space standards for 'affordable' housing, and we also welcome what is said about stopping developers from trying to wriggle out of obligations to provide a bigger element of such accommodation.	Noted.	No change.
Environment Agency	Thank you for consulting the Environment Agency on your Affordable Housing SPD, we have no comments to make.	Noted.	No change.
Natural England	Thank you for your consultation regarding the Runnymede Affordable Housing Supplementary Planning Document (SPD). Natural England has <u>no comments</u> to make.	Noted.	No change.
Raven Housing Trust	The criteria relating to Registered Providers appear to be heavily weighted towards providers which already operate in the Borough. For example, in para.2.1.5, it states that "The Council works with a number of affordable housing providers that meet the following criteria"...the first bullet point refers to those that "Own and manage stock in the Borough;" This is also true of para. 2.17 the first two bullet points of which state that, "Whether the	The Council has set out that it has a list of preferred partners who have a successful track record of delivering affordable housing in the Borough, as is clearly set out in paras. 2.1.5 and 2.1.7 of the SPD. However, despite this we recognise that other providers that aren't currently represented in the Borough may wish to operate in Runnymede. The Council wishes to ensure that providers who don't currently operate in the	The suggestions made for changes to the criteria relating to Registered Providers (para. 2.1.7) have been taken into consideration and a number of amendments made to the text (see previous column for details).

Representor	Summary of Representation	Council's Response	Amend SPD?
	<p>organisation has any other affordable housing in the Borough or in neighbouring local authority areas;" and "Past commitment and performance in the Borough;"</p> <p>My instinct is Raven could provide excellent, locally focused and accountable services but could be discouraged from working in the borough. A suggestion might be to have providers who:</p>	<p>area meet certain minimum criteria before being encouraged to operate in the area.</p>	
	<p>Understand their customers and who tailor services to all customers being accessible (this is particularly important post pandemic)</p> <p>Which engages positively with the local authority, supporting the wider housing strategy (as above).</p> <p>Maybe something around maintaining at least G2 V2 as a regulatory assessment (so you're not supporting HA's who are judged as being non-compliant with the regulatory framework).</p> <p>Demonstrable commitment to Equality and Diversity in the local setting.</p> <p>Promote innovation and best practice locally and nationally.</p>	<p>It is considered that this criterion would be difficult to measure and as such has not been included in the SPD.</p> <p>Agreed. This criterion has now been included in para. 1.7</p> <p>It is considered that this criterion would not necessarily be directly relevant to proposed future provision and so has not been added to the SPD.</p> <p>Agreed. This criterion has now been included in para. 1.7</p> <p>It is considered that this criterion would be difficult to measure and as such has not been included in the SPD.</p>	

Representor	Summary of Representation	Council's Response	Amend SPD?
	<p>Commitment to Net Zero and sustainability</p> <p>Commitment to affordability and tenancy sustainment</p>	<p>Agreed. This criterion has now been included in para. 1.7</p> <p>Agreed - evidence of measures to increase the likelihood of tenants successfully managing their tenancies. This criterion has now been included in para. 1.7.</p>	
<p>Southern Housing Group</p>	<p>We are very supportive of the objective and implementation process as outlined in the document.</p> <p>The clarity around parking levels for affordable tenure and the viability appraisal process are particularly welcome.</p>	<p>Noted</p>	<p>No change.</p>
	<p>Para. 3.1.3 The reference to affordable housing being given priority over less critical infrastructure is also welcome.</p>	<p>Noted</p>	<p>No change.</p>
	<p>Para. 4.1.13: Ask that this section is titled recycling of subsidy, rather than receipts. The RP business model will not be able to implement a system requiring recycling of receipts from S/O in specific boroughs. A system as implemented by Homes England in relation to Recycled Grant would be acceptable. The equivalent of grant</p>	<p>Agreed that the heading to this section is misleading. However, it is considered that the heading "Replacing affordable housing that is lost" would be more appropriate for this section. In addition, for clarity the word 'receipts' has been changed to 'monies' in the second sentence so that it now reads as "In all</p>	<p>The heading to this section has been changed and a word changed.</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
	would be a calculation of the value that has been captured from the planning gain, and this element could be subject to recycling. But the methodology could be complicated and difficult to enforce.	cases the Council expects the dwelling(s) to be replaced within the Borough, or any <u>monies</u> arising from the disposal of the dwelling(s) to be recycled to provide further affordable housing in the Borough, whenever possible.”	
Surrey County Council	Thank you for consulting us on the Affordable Housing SPD. We do not have any comments to make.	Noted.	No change.
Transport for London	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft Affordable Housing SPD.	Noted.	No change.
Waverley Borough Council	Thank you for consulting Waverley Borough Council on the draft Affordable Housing Supplementary Planning Document. We have no comments to make.	Noted.	No change.
Runnymede Housing Team's comments	Thank you for the opportunity to comment on the draft Affordable Housing Supplementary Planning Document (SPD). We are very keen to have the SPD in place to strengthen the Council's commitment to securing affordable housing (AH) and to clarify its requirements. We agree that AH is central to local people having good life chances and that it also helps to build strong communities and boost the economy. Our Housing Strategy	Noted.	No change.

Representor	Summary of Representation	Council's Response	Amend SPD?
	<p>Statement (2021 – 2026) includes the aspiration for sufficient and affordable, good quality housing that is accessible and suitable for local people in Runnymede. We have a strategic aim to increase the provision of AH including low cost home ownership; and believe this SPD will help us achieve this.</p>		
	<p>We welcome the SPD as a tool to ensure the robust enforcement of Local Plan policies, but as stated, it is also helpful to encourage applicants to seek confirmation from us of the Council's most current requirements for the mix, size and tenure of rented properties for AH because – again, as stated – the needs of those on the Housing Register do fluctuate. To further inform this, we look forward to the results of the HEDNA analysis of housing needs, particularly with regard to affordability and mobility and in respect of those not currently registered with us for social housing. This work will help with our strategic aim to identify local housing need to plan effectively for the future.</p>	Noted.	No change.
	<p>We are particularly supportive of encouraging pre-application dialogue, particularly in relation to the issues identified at 2.1.3. We remain committed to strongly encouraging the selection</p>	<p>Noted and further wording has been added to the SPD at para. 2.1.8 to reflect this position (see below).</p>	<p>See the adjoining column for the wording</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
	<p>of RPs from our list of Preferred Partners and believe this can be strengthened by using standardised definitions and text in draft s.106s to be shared with developers early on in the process, to aid clarity and avoid protracted negotiations. We are aware that other RPs may wish to acquire AH and - in order to always ensure we have RPs with a commitment to promoting sustainable communities in the Borough and to working in partnership with us on our Tenancy Strategy objectives - we will be happy to work with you to refine the criteria proposed in the draft SPD and the steps to be followed if the owner is unable or unwilling to enter into a contract for the disposal of the AH Units to one of our existing Preferred Partners. We also look forward to working with you to finalise the wording to be included in the template(s), based on current best practice in the sector.</p>	<p><u>“The Council has established good relationships with a number of Partner Registered Providers (known as ‘Partner RPs’) that operate effectively in partnership with the Council to provide affordable housing that meets local housing need. As such, the Council encourages developers to meet their affordable housing obligations by forming a partnership with one of the Council’s Partner Registered Providers following discussion with Housing Services. Applicants should contact the Council for an up-to-date list of Partner Registered Providers and advice on which Registered Provider would be most appropriate for their development.”</u></p>	<p>changes made to the SPD.</p>
	<p>Providing housing that is genuinely affordable is a significant challenge. The Affordable Rent product, with a rent of 80% of market rent is not affordable in practice for many households on the housing register and those the Council has a statutory duty to house. Homes England are keen</p>	<p>Noted</p>	<p>No change</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
	to see more properties delivered in high cost areas such as Runnymede at Social ("formula") Rent, as charged by RBC for Council properties and is providing grant to achieve this, although s.106 sites would not usually qualify unless the scheme becomes 100% affordable. It is hoped that the HEDNA will evidence this need, resulting in a requirement for Social Rent in the SPD.		
	We welcome the approach to commuted sums and can confirm that – with a commitment to deliver 125 new Council homes over the next 5 years - these funds could be spent on Council new build developments.	Comments noted.	No change.
	Finally, we also welcome the proposal to use overage/clawback clauses when considering viability and look forward to the detail of how these will be enforced.	No further detail on this will be provided in the SPD. This will require further discussions between the Council's Housing and Legal Services teams.	No change.

Other changes made to the SPD prior to its adoption

17. In addition to the changes set out above, made to take account of consultation responses to the SPD, a number of other changes were also made to the Draft Affordable Housing SPD. These changes and the reasons for them, are set out in more detail in Table 3 below either struck through where text has been deleted or in bold and underlined where text has been added.

Paragraph	Original Text	Text as Modified on Adoption	Reason
Text on the back of the front cover	<p>Published by Runnymede Borough Council October 2021 Runnymede Civic Centre Station Road Addlestone Surrey KT15 2AH</p> <p>This document can be viewed and downloaded from: https://www.runnymede.gov.uk/say/consultations-surveys</p>	<p>Published by Runnymede Borough Council October 2021 March 2022 Runnymede Civic Centre Station Road Addlestone Surrey KT15 2AH</p> <p>This document can be viewed and downloaded from: https://www.runnymede.gov.uk/say/consultations-surveys https://www.runnymede.gov.uk/planning-policy/preparation-supplementary-planning-documents/6</p>	To identify the adopted version of the SPD and delete details of public consultation.
On all pages of the SPD	Delete the Draft watermark.	Leave each page clear of a watermark.	To identify the adopted version of the SPD and delete details of public consultation.
Throughout document	Correction of minor typographical errors/minor wording issues	Not specifically set out in this table but corrected as necessary	To ensure that the document reads well
Para. 1.1.1 First sentence	This supplementary planning document (SPD), focuses on affordable housing in Runnymede and helps to implement the council's Local Plan Policies for affordable housing particularly Policy SL20: Affordable Housing and Policy SL19: Housing Mix and Size Requirements....	This supplementary planning document (SPD), which was adopted on 13th April 2022 (and implemented on 20th April 2022) focuses on affordable housing in Runnymede and helps to implement the council's Local Plan Policies for affordable housing particularly Policy SL20: Affordable Housing and Policy SL19: Housing Mix and Size Requirements....	To identify the adopted version of the SPD and delete details of public consultation.
Section 1.2 Background	Not applicable. Officers were asked at Planning Committee on 24 th November 2021 to consider	There is limited ability to consider 'local market value' in Runnymede given the Government's definition of	No change proposed

Paragraph	Original Text	Text as Modified on Adoption	Reason
	<p>Local Market Value in more detail with the Council's Housing Team and report back thereon.</p>	<p>affordable housing, outside of social rent (as charged by the Council for most of the existing housing stock) and the new First Homes initiative.</p> <p>The current Local Plan Affordable Housing Policy (SL20) doesn't distinguish between social and affordable rent.</p> <p>Affordable rent is defined as up to 80% of market rent and so it can still be at a level beyond the reach of households in housing need. Social rent is set based on a formula set by the Government which is calculated based on the relative value of the property, relative income levels, and the size of the property. Social rents tend to be lower than affordable rent.</p> <p>Registered Providers tend to deliver affordable rent as opposed to social rent.</p> <p>The Council has ensured that the HEDNA work will include a fine-grained assessment to look at what the need is for affordable/ social rent and other forms of AH in more detail. This will enable a more detailed affordable housing policy to be included in the next iteration of the Runnymede Local Plan.</p> <p>The Housing Team have provided a note on the Rent Setting Policy, approved 9th June 2021, which can be forwarded to Members if they wish to see it.</p>	
Para. 1.2.7	<p>Once adopted, this Supplementary Planning Document (SPD) will replace the existing Runnymede Affordable Housing Supplementary</p>	<p>Once adopted, <u>This</u> Supplementary Planning Document (SPD) will <u>replaces</u> the existing Runnymede</p>	<p>To identify the adopted version of the SPD and delete details of public consultation.</p>

Paragraph	Original Text	Text as Modified on Adoption	Reason
	Planning Guidance (adopted on 13 th December 2007).	Affordable Housing Supplementary Planning Guidance (adopted on 13 th December 2007).	
Para. 1.3.1 Other relevant definitions	<p>However, the Guidance sets out a few instances where the new First Homes policy requirements do not apply, one of which is, as set out in the Planning Practice Guidance on First Homes (para. 18) where Local Plans have been “submitted for examination before 28th June 2021 or have reached publication stage by 28th June 2021 and subsequently submitted for examination by 28 December 2021, will not be required to reflect the First Homes Policy requirement.” The Runnymede 2030 Local Plan was adopted in July 2020 and is therefore considered to fall under these transitional arrangements. Consequently, in line with this guidance (para. 019) “As set out in the Written Ministerial Statement, where local and neighbourhood plans are adopted under the aforementioned transitional arrangements, the First Homes requirements will also not need to be applied when considering planning applications in the plan area on allocated sites, until such time as the requirements are introduced through a subsequent update.”</p> <p>The First Homes policy requirement is not therefore considered to need to be reflected in the Local Plan, until such time as the Runnymede 2030 Local Plan has been reviewed and updated (see para. 2.3.10 below for more on First Homes).</p>	<p><u>An Interim Policy Statement (IPS) has been produced for First Homes. This sets out how this new form of affordable housing will be applied in Runnymede. As First Homes are being introduced quickly by the Government and, as a result, we don’t currently have evidence to include the full extent of local eligibility criteria in the Borough, it is considered that the position on First Homes in Runnymede should be set out in an Interim Policy Statement, as opposed to within this SPD. This will enable future updates to be made as and when more supporting evidence becomes available.</u></p> <p>However, the Guidance sets out a few instances where the new First Homes policy requirements do not apply, one of which is, as set out in the Planning Practice Guidance on First Homes (para. 18) where Local Plans have been “submitted for examination before 28th June 2021 or have reached publication stage by 28th June 2021 and subsequently submitted for examination by 28 December 2021, will not be required to reflect the First Homes Policy requirement.” The Runnymede 2030 Local Plan was adopted in July 2020 and is therefore considered to fall under these transitional arrangements. Consequently, in line with this guidance (para. 019) “As set out in the Written Ministerial Statement, where local and neighbourhood plans are adopted under the aforementioned transitional arrangements, the First Homes requirements will also not need to be applied when considering planning applications in the plan area on allocated sites, until</p>	<p>This change has been made to address the clarification point, requested at Planning Committee on 24th November 2021, on First Homes.</p> <p>Since the draft Affordable Housing SPD was produced an Interim Policy Statement has been produced on First Homes. This sets out the Council’s position with regards to the implementation of First Homes, as it is more easily updated as evidence on this new tenure emerges.</p>

Paragraph	Original Text	Text as Modified on Adoption	Reason
		<p>such time as the requirements are introduced through a subsequent update.”</p> <p>The First Homes policy requirement is not therefore considered to need to be reflected in the Local Plan, until such time as the Runnymede 2030 Local Plan has been reviewed and updated (see para. 2.3.10 below for more on First Homes).</p>	
Para. 2.1.4		<p>Additional text added at the end of the existing para.</p> <p><u>Please check with Legal Services to see the latest version of the s106 agreement.</u></p>	To future proof the s106 template.
Para. 2.3.8	<p>In terms of tenure, the overall housing target on qualifying sites is to provide 70% of the total dwellings as social/affordable rented properties and 30% as other forms of affordable housing. Social rented homes are preferred in order to facilitate movement which makes best use of the social housing stock in the Borough.</p>	<p>In terms of tenure, the overall housing target on qualifying sites, <u>as set out in Policy SL20 of the adopted Local Plan</u>, is to provide 70% of the total dwellings as social/affordable rented properties and 30% as other forms of affordable housing. Social rent is the preferred form of tenure of affordable housing needed in the Borough.</p>	On reading this through it was considered that it would be useful to provide detail as to what was meant by a qualifying site and to simplify the meaning of the text.
Para. 2.3.10	<p>Whilst the Council has noted above that the First Homes policy requirement will not need to be applied when considering planning applications in the plan area on allocated sites, until such time as the requirements are introduced through a subsequent update (i.e. until such time as the Runnymede 2030 Local Plan has been reviewed and updated), should either Planning Policy Guidance or a Ministerial Statement be issued that makes it clear that the First Homes policy requirement does apply prior to any subsequent Local Plan update, in calculating the number of units to be provided on any qualifying site, local decision makers will determine the relative weight to give local and</p>	<p><u>The details of the implementation of First Homes in Runnymede are set out separately in an Interim Policy Statement (IPS). However, it is important to note that the introduction of First Homes results in the tenure mix of affordable housing dwellings in Runnymede changing from the 70:30 split, outlined in para. 2.3.8 above, to 25% First Homes, 53% social/ affordable rent and 30% other forms of affordable housing, as is clearly set out in the IPS.</u></p> <p>Whilst the Council has noted above that the First Homes policy requirement will not need to be applied when considering planning applications in the plan area on allocated sites, until such time as the requirements are introduced through a subsequent update (i.e. until such time as the Runnymede 2030</p>	Since the draft Affordable Housing SPD was produced an Interim Policy Statement has been produced on First Homes. This sets out the Council’s position with regards to the implementation of First Homes.

Paragraph	Original Text	Text as Modified on Adoption	Reason
	<p>national policies with regards to First Homes. In such circumstances, if a decision is taken that First Homes should be provided in an application, the 25% for First Homes should be taken from the 'other forms of affordable housing'. This is because the main need for affordable housing in the Borough is for rented accommodation. This will therefore have the impact of reducing 'other forms of affordable housing' such as Shared Ownership in the Borough but will not impact on the rented contribution.</p>	<p>Local Plan has been reviewed and updated), should either Planning Policy Guidance or a Ministerial Statement be issued that makes it clear that the First Homes policy requirement does apply prior to any subsequent Local Plan update, in calculating the number of units to be provided on any qualifying site, local decision makers will determine the relative weight to give local and national policies with regards to First Homes. In such circumstances, if a decision is taken that First Homes should be provided in an application, the 25% for First Homes should be taken from the 'other forms of affordable housing'. This is because the main need for affordable housing in the Borough is for rented accommodation. This will therefore have the impact of reducing 'other forms of affordable housing' such as Shared Ownership in the Borough but will not impact on the rented contribution.</p>	
<p>New paras. added at 2.3.12 and 2.3.12</p>	<p>Not applicable.</p>	<p><u>The Council expects applicants to be transparent, as far as practicable, at the application stage about the tenure mix proposed for a particular site. However, it is recognised that this is not always possible, as the tenure mix will often depend on what grant the provider is able to achieve. For sites with planning permission that later propose to include additional affordable housing on the site over and above the policy requirement of 35% set out in policy SL20 of the Local Plan, consideration will be given to the scale, location, tenure mix, local housing need, design, sustainability (energy efficiency), impact on infrastructure, and future management of the site.</u></p>	<p>The Council is seeing an increase in the number of applications with 100% affordable housing. This results in no CIL payment being made for the sites. In the light of the recent Stonewater High Court ruling on this issue, the Council wishes to set out its position on this in the SPD.</p>

Paragraph	Original Text	Text as Modified on Adoption	Reason
		<u>For the avoidance of doubt, where the Council is minded to grant planning permission for a development proposal, S106 agreements will confirm the amount of affordable housing required to be provided on a site, in line with the application proposal before the Council. If an applicant wishes to amend their planning consent at a later date to propose additional affordable housing, a Deed of Variation will be required to vary the existing S106 agreement.</u>	
Para. 2.5.6	The Council has commissioned a consultant to provide a robust methodology to calculate affordable housing commuted sum requirements. The formulae for this calculation will, once it is complete, be available to view alongside the Affordable Housing SPD, on the Council's website. This will allow applicants to check upfront any commuted sum payments that are likely to be required in lieu of affordable housing for schemes that have been agreed with the Council or for applications that result in part of an affordable dwelling being required on site.	<u>The Council commissioned a consultant, BPS, to provide a robust methodology to calculate affordable housing commuted sum requirements in the Borough. The detailed report setting out how this formula has been derived is set out as Appendix 3 to this SPD. This approach should be followed by applicants for calculating any commuted sum payments that are likely to be required in lieu of on-site affordable housing for schemes that have been agreed with the Council.</u>	Factual update to allow for the fact that this work has now been completed.
Para. 3.1.18 Third sentence	Any remaining disputes between the Council and the applicant will be referred to an independent arbitrator (in accordance with RICS guidance).	Any remaining disputes between the Council and the applicant will be referred to an independent arbitrator (in accordance with RICS guidance).	It is proposed to delete this wording as it is considered on reflection that it effectively places the decision on viability issues with a third party not the decision maker.
Para. 3.1.20	Additional text added at the end of the existing paragraph.	<u>Where a viability case has been accepted on an outline planning application this should be reviewed at the reserved matters stage. For other non-policy</u>	It is considered that additional text is needed to clarify the situation with regards to

Paragraph	Original Text	Text as Modified on Adoption	Reason
		<u>compliant schemes clawback or similar arrangement will be considered. Appropriate triggers for reviews at different stages of development or phases may be required in agreements.</u>	planning applications and the viability review process.
Heading above para. 3.1.21	'Indexation of Financial Contributions'	Indexation of Financial Contributions <u>Late stage viability reviews</u>	On reflection it was considered that this heading more accurately reflects the wording contained in this section of the SPD.
Para. 4.1.5	New text added to the end of the paragraph.	<u>A template Nominations Agreement is available from the Housing Department.</u>	Additional wording requested to set out that a template nominations agreement is also available from the Council.
Appendix 2	Template Affordable Housing Section 106 Agreement	The key changes include: With regard to the changes made to the S106 Template, the main changes are: <ul style="list-style-type: none"> • Amending the definition of Affordable Housing • Including a definition of First Homes • Adding a definition of Social Rented Housing dwellings • Amending the definition of SAMM to Strategic Access Management and Monitoring • Amending the definition of the Strategy to refer to the recently adopted Thames Basin Heaths SPD. • Included a definition of Affordable Housing for Rent. • The Interest rate for late payment was amended. 	A number of clauses in the s106 template have been changed to bring it in line with the Council's most recent s106 agreements.

Paragraph	Original Text	Text as Modified on Adoption	Reason
Appendix 3	Not applicable.	This Appendix sets out the contributions cap work, undertaken for the Council by the consultants BPS, which forms the basis for the Affordable Housing Commuted Sum work which sits alongside the SPD on the website.	This work has been completed since the draft SPD was consulted on.

Runnymede Borough Council

**Affordable Housing
Supplementary Planning Document (SPD)**

Strategic Environmental Assessment (SEA)

Screening Statement - Determination under Regulation 9 of the SEA Regulations 2004

Habitats Regulations Assessment (HRA)

Screening Statement – Determination under Regulation 105 of the Conservation of Habitats
and Species Regulations 2017

March 2022

1.0 Introduction

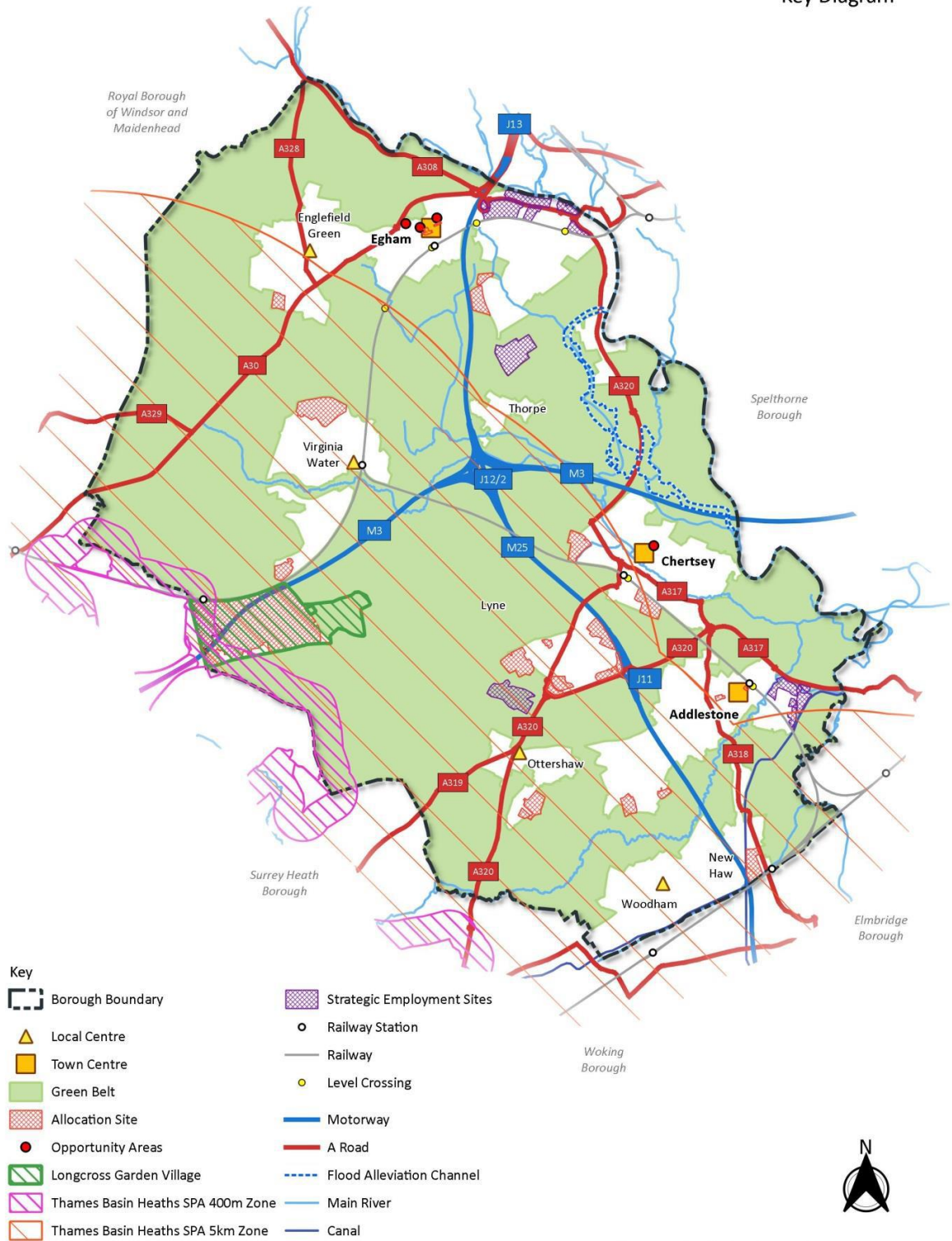
- 1.1. Runnymede Borough Council has prepared an Affordable Housing Supplementary Planning Document (SPD). The purpose of this screening statement is to ascertain whether the Affordable Housing SPD may have a significant effect on the environment and therefore require a Strategic Environmental Assessment (SEA) under European Union Directive 2001/42/EC (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).
- 1.2. It also determines whether or not the contents of the Affordable Housing SPD require a Habitats Regulation Assessment (HRA) in accordance with European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive) and the associated Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations).
- 1.3. The screening exercise therefore looks at the proposals in the SPD to determine whether a significant effect is likely.

Background to the Affordable Housing Supplementary Planning Document (SPD)

- 1.4. The Planning & Compulsory Purchase Act 2004 (as amended) makes provision for local authorities to prepare and adopt Local Development Documents which can include SPD's. However, an SPD does not form part of the Development Plan for an area as set out in Section 38 of the Planning & Compulsory Purchase Act 2004 (as amended), but it is a material consideration in taking planning decisions.
- 1.5. The purpose of the Affordable Housing SPD is to aid the effective implementation of the Council's Spatial Development Strategy and the Affordable Housing Policies in the adopted Runnymede 2030 Local Plan (July 2020). The key policies on Affordable Housing are:
 - SL19: Housing Mix and Size Requirements
 - SL20: Affordable Housing
- 1.6. An SPD is required to be consulted on and adopted by the Borough Council and once implemented sets out additional planning guidance that supports and/or expands upon the Policies in the Local Plan. The SPD will provide practical advice to all parties seeking to comply with the Local Plan policies and will therefore be of particular use to developers, architects and agents wishing to bring forward development in the Borough.
- 1.7. The Runnymede 2030 Local Plan, which is the document which allocates sites and contains policies concerning land use, has been the subject of Sustainability Appraisal (including the requirements for Strategic Environmental Assessment) as well as Habitats Regulations Assessment (HRA).
- 1.8. The proposed Affordable Housing SPD covers all of the area within the jurisdiction of Runnymede Borough Council and contains the urban areas of Addlestone, Chertsey, Englefield Green, Egham, Ottershaw, Woodham & New Haw and Virginia Water. Interspersed between the urban areas is designated Green Belt holding numerous wooded copses, golf courses and businesses as well as small pockets of development, agriculture and equestrian uses. The M25 and M3 motorways bisect the Borough north-south and east-west respectively and effectively cut the Borough into four quarters. There are six rail stations in Runnymede Borough offering direct services to London Waterloo, Reading & Woking. A plan of the designated area is shown in Plan 1-1.

Plan 1-1: Map of Runnymede Borough

Runnymede Borough Key Diagram



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- 1.9. There are numerous areas of woodland/ copses designated as ancient/semi-natural or ancient replanted woodland which are also identified as priority habitat as well as swathes of wood pasture and parkland which is a national Biodiversity Action Plan (BAP) designation. Priority habitat designations also include areas of lowland meadows, lowland heathland, and lowland fens. There are five SSSIs located in the Borough area, Basingstoke Canal, Langham Pond, Thorpe Haymeadow, Thorpe no.1 Gravel Pit and Windsor Forest.
- 1.10. Unit 2 of the Basingstoke Canal SSSI lies to the south of the Borough and is in an unfavourable, no change status which does not meet the PSA target of 95% in favourable or unfavourable recovering status. Status reasons are extent of habitat, lack of plant diversity and poor water quality.
- 1.11. Langham Pond SSSI is formed of 3 units. 100% of the SSSI is in a favourable or unfavourable recovering status, meeting the PSA target. The Thorpe Haymeadow SSSI is formed of one unit in a favourable condition, which also meets the PSA Target.
- 1.12. The Thorpe no.1 Gravel Pit SSSI is formed of one unit and is in a favourable condition status meeting the PSA target. The SSSI also forms part of the wider South West London Water Bodies Special Protection Area (SPA) and Ramsar, an internationally designated site for nature conservation importance.
- 1.13. The Windsor Forest SSSI is formed of 22 units with units 10, 11 and 16 within or partly within Runnymede. The SSSI is in 100% favourable condition status and meets the PSA target of 95%. The SSSI also forms part of the Windsor Forest & Great Park Special Area of Conservation (SAC) another internationally designated site for nature conservation importance.
- 1.14. Other internationally designated sites, whilst not within the Borough but are within 5km include the Thames Basin Heaths Special Protection Area and Thursley, Ash, Pirbright & Chobham SAC.
- 1.15. The Borough also lies within 12km of the Mole Gap to Reigate Escarpment SAC, 12.2km from Burnham Beeches SAC, 13km of the Richmond Park and Wimbledon Common SACs, 20km from the Chiltern Beechwoods SAC, 23km from the Wealden Heaths Phase I SPA and its component parts (including Thursley, Hankley & Frensham Commons SPA and Thursley & Ockley Bog Ramsar) and 30km from the Wealden Heaths Phase II SPA.
- 1.16. There are also over 30 Sites of Nature Conservation Importance (SNCIs) in the Borough as well as two Local Nature Reserves at Chertsey Meads and Riverside Walk in Virginia Water. The Borough lies within the River Wey and Tributaries catchment and there are large areas of the Borough, including within its urban areas which lie within flood risk zones 2 and 3 including functional floodplain.
- 1.17. From a heritage perspective, the Borough contains numerous statutorily listed or locally listed buildings and structures most notably the Grade I Royal Holloway College building in Englefield Green. There are 6 Conservation Areas in the borough as well as 6 scheduled ancient monuments, 48 areas of high archaeological potential and four historic parks and gardens.

Strategic Environmental Assessment – Regulatory Requirements

- 1.18. The purpose of the SEA is to provide high level protection of the environment and to integrate considerations of the environment into the preparation and adoption of plans with a view to promoting sustainable development. Under the requirements of the European Union Directive 2001/42/EC (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) specific types of plan that set the framework for the future development consent of projects must be subject to an environmental assessment.
- 1.19. In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9 (1)), the Council must determine whether a plan requires an environmental assessment. Where the Borough Council determines that SEA is not required, then under Regulation 9(3), the Council must prepare a statement setting out the reasons for this determination.

Habitat Regulation Assessment

- 1.20. Habitats Regulations Assessment is required to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or the National Site Network (formerly known as Natura 2000 sites). The need for HRA is set out within the EC Habitats Directive 92/43/EEC and transposed into British Law by Regulation 102 of the Conservation of Habitats and Species Regulations 2017.

2.0 Legislative background

Habitat Regulations Assessment

- 2.1 The Habitats Regulations transpose the Habitats Directive into UK law and require HRA to be undertaken for any plan or project likely to have a significant effect upon a European protected site.
- 2.2 The Habitats Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Habitats Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into UK law. They also transpose elements of the EU Wild Birds Directive in England and Wales.
- 2.3 It is a requirement of Article 102 of the Habitats Regulations 2017 that "the plan-making authority for that plan must, before the plan is given effect, make an Appropriate Assessment of the implications for the site in view of that site's conservation objectives" where the plan is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects) and where it is not directly connected with or necessary to the management of the site.
- 2.4 An HRA is required for a plan or project to assess the potential implications for European wildlife sites, i.e., the National Site Network (formerly known as Natura 2000 sites). It explores whether the implementation of a plan or project would harm the habitats or species for which the sites are designated. The sites are:
- Special Protection Areas (SPAs) – designated by the Birds Directive (79/409/EEC as amended and 2009/147/EC), and:

- Special Areas of Conservation (SACs) – designated by the Habitats Directive (92/43/EEC).

2.5 In addition to SPAs and SACs, Ramsar sites are designated under the Ramsar convention. The Ramsar convention’s mission is to conserve and sustainably utilise wetland habitats. Although Ramsar sites are not covered by the Habitats Regulations, as a matter of Government Policy, they should be treated in the same way as European wildlife sites (i.e., SPAs and SACs). European wildlife sites and Ramsar sites are collectively known as internationally designated wildlife sites. Sites of Community Importance (SCIs), which are sites that have been adopted by the European Commission but not yet formally designated by the government, must also be considered.

Strategic Environmental Assessment

2.6 SEA involves evaluation of the environmental impacts of a plan or programme. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”. The SEA Directive sets out a legal assessment process that must be followed. Often within the planning context, the SEA requirements are met by incorporating it within a Sustainability Appraisal (SA), which is a requirement for Development Plan Documents.

2.7 There is no legal requirement for Supplementary Planning Documents to be accompanied by Sustainability Appraisal, and this is reinforced in Planning Practice Guidance (PPG ref: 11-008- 20140306). However, “in exceptional circumstances” there may be a requirement for SPDs to undertake Strategic Environmental Assessment where it is felt they may have a likely significant effect on the environment that has not been assessed within the SEA/SA of the Local Plan.

2.8 To establish whether the SPD is thought to have significant environmental effects and therefore require SEA to be undertaken, a Screening Process has been followed and is presented in Section 4 of this report.

3.0 Habitats Regulations Assessment Screening

HRA Methodology

3.1 HRA follows a four-stage process as outlined in the DCLG guidance “Planning for the Protection of European Sites: Appropriate Assessment”. These stages are described below:

Step 1: Screening

This process identifies the likely effects upon a European site, either alone or in combination with other plans/projects and determines whether these effects are likely to be significant.

Following the decision of the ECJ in the *People Over Wind & Sweetman v. Coillite Teoranta* (C-323/17). Measures that are necessary to avoid or reduce impacts on the European site, when considered environmental best-practice, cannot be taken into account at this stage.

If no likely significant effects are determined, the project or plan can proceed. If any likely significant effects are identified, step 2 commences.

It is the opinion of this HRA screening assessment and in light of the Planning Practice Guidance Note on Appropriate Assessment that adopted policies of the current development plan cannot be taken into account at this stage of HRA where they are proposing mitigation for European Sites. Similarly, any HRA undertaken for other development plan documents which have not been through Examination in Public (EiP) and found sound should only be given limited weight.

Step 2: Appropriate Assessment

Step 2 is subsequent to the identification of likely significant effects upon a European site in Step 1. This assessment determines whether a project or plan would have an adverse impact on the integrity of a European site, either alone or in combination with other projects or plans.

This assessment is confined to the effects on the internationally important habitats and species for which the site is designated (i.e., the interest features of the site). If no adverse impact is determined, the project or plan can proceed. If an adverse impact is determined, step 3 is commenced.

Step 3: Assessment of Alternative Solutions

Assessing alternative ways of achieving the objectives of the plan/project which avoids impact, if after Step 2 significant effect cannot be ruled out even with avoidance or mitigation measures: and

Step 4: Assessment of Compensatory Measures

If no suitable avoidance/mitigation or alternative options are identified, as a rule the project or plan should not proceed.

However, in exceptional circumstances, if there is an 'imperative reason of overriding public interest' (IROPI) for the implementation of the project or plan, consideration can be given to proceeding in the absence of alternative solutions. In these cases, compensatory measures must be put in place to offset negative impacts.

Habitats Regulations Assessment (HRA) – Screening of the Affordable Housing SPD

Step 1 - Screening

3.2 There are four stages to consider in a screening exercise:

Stage 1: Determining whether the plan/project is directly connected with or necessary to the management of the site;

Stage 2: Describing the plan/project and description of other plan/projects that have the potential for in-combination impacts;

Stage 3: Identifying potential effects on the European site(s); and

Stage 4: Assessing the significance of any effects.

Stage 1

- 3.3 It can be determined that the Affordable Housing SPD is not directly connected with or necessary to the management of a European site.

Stage 2

- 3.4 Information about the Affordable Housing SPD can be found in paragraphs 1.5 to 1.17 of this screening assessment. Table 1-1 lists those other plans and projects, which may have in-combination impacts.

Table 1-1: Other Key Plans/Projects

<p>Plan/ Project</p>	<p>National Planning Policy Framework (2021): High level national planning policy covering topics such as housing, economy, employment, retail as well as biodiversity, flood risk and heritage.</p> <p>South East Plan 2009: Saved Policy NRM6 sets out protection for the Thames Basin Heaths SPA.</p> <p>London Plan 2016: Contains planning policies for the development of land across the wider London area including housing and employment allocations with a target of 42,000 new homes per annum.</p> <p>Runnymede 2030 Local Plan (Adopted): Sets policies for the consideration of development and the spatial strategy for the Borough including provision of 7,920 dwellings over the Plan period and allocations for residential, employment and retail development.</p> <p>Thorpe Neighbourhood Development Plan made (adopted) 30th June 2021.</p> <p>Other Local Authority Local Plans within 10km or adjoining sites identified in paras 1.8 to 1.17: Housing target for areas around European sites set out in Table 1-2.</p> <p>Large Scale Projects within 10km or adjoining European Sites: Large scale projects within 10km are subsumed in the consideration of 'Other Local Authority Local Plans' above.</p> <p>Thames Basin Heaths Joint Delivery Framework 2009: Sets out the agreed Framework regarding the approach and standards for avoiding significant effects on the Thames Basin Heaths SPA.</p> <p>Environment Agency, Thames River Basin District Management Plan (2015): Sets out actions to improve water quality. Future aims for the River Wey include implementing Lower Wey Oxbow Restoration Project to enhance and restore the main Wey river channel and Wey Diffuse Advice Project throughout the catchment.</p> <p>Environment Agency, Thames Catchment Flood Management Plan (2009): Aim is to promote more sustainable approaches to managing flood risk. Will be delivered through a combination of different approaches.</p> <p>Environment Agency, River Wey Catchment Abstraction Management Strategy (2019): identifies the Wey having restricted 'Water available for licensing'.</p> <p>Environment Agency, Water Resources Strategy: Regional Action Plan for Thames Region (2009): Key priorities for Thames region include ensuring sufficient water resources are available, making water available in over-abstracted catchments and reducing demand.</p>
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Table 1-2: List of Local Authority Housing Targets within 10km of European Sites

Site	Local Plan Area	Housing Target
Thames Basin Heaths SPA*		
	Waverley Borough	11,210
	Guildford Borough	10,678
	Woking Borough	4,964
	Surrey Heath Borough	3,240
	Runnymede Borough	7,920
	Elmbridge Borough	3,375
	Bracknell Forest Borough	11,139
	Windsor & Maidenhead	14,260
	Wokingham Borough	13,230
	Rushmoor Borough	8,884
	Hart District	7614
Total		96,514
Windsor Forest & Great Park SAC		
	Runnymede Borough	7,920
	Woking Borough	4,964
	Surrey Heath Borough	3,240
	Spelthorne Borough	3,320
	Elmbridge Borough	3,375
	Windsor & Maidenhead Borough	14,260
	Bracknell Forest Borough	11,139
	Slough Borough	6,250
	South Bucks District	2,800
	LB Hillingdon	6,375
	LB Hounslow	13,040
Total		76,683
South West London Water Bodies SPA & Ramsar		
	Runnymede Borough	7,920
	Elmbridge Borough	3,375
	Spelthorne Borough	3,320
	Epsom & Ewell Borough	3,620
	Mole Valley District	3,760
	Windsor & Maidenhead Borough	14,260
	Slough Borough	6,250
	Bracknell Forest Borough	11,139
	South Bucks District	2,800
	LB Hillingdon	6,375
	LB Hounslow	13,040
	LB Ealing	14,000
	LB Kingston	5,625
	LB Richmond	3,150
Total		98,634

* Also includes the Thursley, Ash, Pirbright & Chobham SAC

Stage 3

- 3.6 Information regarding the European site(s) screened and the likely effects that may arise due to implementation of the Affordable Housing SPD can be found in Tables 1-

3 to 1-6 and 1-7. All other European Sites were screened out of this assessment at an early stage as it was considered that their distance from the Borough area meant that there is no pathway or mechanism which would give rise to significant effect either alone or in combination. In this respect regard has been had to the 2030 Local Plan HRA specifically paragraphs 2.1-2.2.

Table 1-3: Details of Thames Basin Heaths SPA and Potential Effects Thereon

European site:	Thames Basin Heaths Special Protection Area (SPA).
Site description:	The Thames Basin Heaths SPA was proposed in October 2000, and full SPA status was approved on 9 March 2005. It covers an area of some 8,274 ha, consisting of 13 Sites of Special Scientific Interest (SSSI) scattered from Surrey, to Berkshire in the north, through to Hampshire in the west. The habitat consists of both dry and wet heathland, mire, oak, birch acid woodland, gorse scrub and acid grassland with areas of rotational conifer plantation.
Relevant international nature conservation features:	Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive: During the breeding season: <ul style="list-style-type: none"> - Nightjar <i>Caprimulgus europaeus</i>: 7.8% of the breeding population in Great Britain (count mean, 1998-1999); - Woodlark <i>Lullula arborea</i>: 9.9% of the breeding population in Great Britain (count as at 1997); - Dartford warbler <i>Sylvia undata</i>: 27.8% of the breeding population in Great Britain (count as at 1999).
Environmental conditions which support the site	<ul style="list-style-type: none"> • Appropriate management • Management of disturbance during breeding season (March to July) • Minimal air pollution • Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species • Maintenance of appropriate water levels • Maintenance of water quality
Potential Effects arising from the Affordable Housing SPD	<ul style="list-style-type: none"> • None (see Table 1-7)

Table 1-4: Details of Thursley, Ash, Pirbright & Chobham SAC and Potential Effects Thereon

International site:	Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC)
Site description:	The Thursley, Ash, Pirbright & Chobham SAC covers an area of some 5,154 ha with areas of wet and dry heathland, valley bogs, broad-leaved and coniferous woodland, permanent grassland and open water.
Relevant international nature conservation features:	The Thursley, Ash, Pirbright and Chobham Special Area of Conservation is designated for three Annex I habitats. The qualifying Annex 1 habitats are: <ul style="list-style-type: none"> - Wet heathland with cross-leaved heath - Dry heaths - Depressions on peat substrates
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Appropriate management; • Managed recreational pressure; • Minimal air pollution; • Absence or control of urbanisation effects such as fires and introduction of invasive non-native species; • Maintenance of appropriate water levels; • Maintenance of water quality.
Potential Effects arising from the Affordable Housing SPD	<ul style="list-style-type: none"> • None (see Table 1-7)

Table 1-5: Details of Windsor Forest & Great Park SAC and Potential Effects Thereon

International site:	Windsor Forest & Great Park SAC
Site description:	The Windsor Forest & Great Park SAC covers an area of some 1,680 ha with Atlantic acidophilus beech forests with Ilex and sometimes Taxus. It is one of four outstanding locations in the UK for oak woods on sandy plains and is one of only three areas in the UK for <i>Limoniscus violaceus</i> (violet click beetle).
Relevant international nature conservation features:	Annex I habitat of oak woods on sandy plain which is the primary reason for designation with Atlantic beech forests.
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Loss of trees through forestry management • Urbanisation • Managed recreational pressure • Air Quality
Potential Effects arising	<ul style="list-style-type: none"> • None (see Table 1-7)

from the Affordable Housing SPD	
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Table 1-6: Details of South West London Water Bodies SPA & Ramsar and Potential Effects Thereon

International site:	South West London Water Bodies SPA & Ramsar
Site description:	The South West London Water Bodies SPA & Ramsar covers an area of some 825 ha and is formed from 7 former gravel pits and reservoirs which support overwintering populations of protected bird species.
Relevant international nature conservation features:	Supports overwintering populations of:- Gadwall Shoveler
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Managed recreational pressure • Water quality • Water abstraction
Potential Effects arising from the Affordable Housing SPD	<ul style="list-style-type: none"> • None (see Table 1-7)

Stage 4

3.7 The consideration of potential effects is set out in Table 1-7.

Table 1-7: Assessment of Potential Effects

Indirect effect from recreational disturbance and urbanisation.	<p>The likely effects of recreational disturbance have been summarised in the Underhill-Day study for Natural England and RSPB (2005); this provides a review of the urban effects on lowland heaths and their wildlife. The main issues relating to the conservation objectives and the integrity of the SPAs and SAC's effected by recreational disturbance and urbanisation as a whole are fragmentation, disturbance, fires, cats, dogs (as a result of nest disturbance and enrichment), prevention of management, off-roading, vandalism and trampling.</p> <p>Natural England has advised that recreational pressure, as a result of increased residential development within 5km of the Thames Basin Heaths SPA & Thursley, Ash, Pirbright & Chobham SAC (or sites of 50 or more dwellings within 7km), is having a</p>
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	<p>significant adverse impact on the Annex I bird species. Woodlark and Nightjar are ground nesting and Dartford Warblers nest close to the ground. They are therefore sensitive to disturbance, particularly from dogs, but also from walkers, and cyclists etc. They are, in addition, vulnerable to other effects of urbanisation, in particular predation by cats.</p> <p>Joint work involving Natural England and the authorities affected by the SPA/SAC have agreed a mechanism to avoid impacts to the SPA/SAC from recreational activities in the form of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management & Monitoring (SAMM) and from the impacts of urbanisation by not allowing any net additional dwellings within 400m of the SPA.</p> <p>In terms of the Windsor Forest & Great Park SAC the Runnymede 2030 Local Plan HRA states that forestry management and recreational impacts has the potential for loss of trees and damage to trees from burning (arson).</p> <p>For the South West London Water Bodies SPA & Ramsar threats arise through unmanaged recreational activities such as use of motorboats and fishing.</p> <p>The Affordable Housing SPD provides guidance for delivering already adopted development plan policies at a higher tier (the Runnymede 2030 Local Plan) with the aim of securing planning obligations and affordable housing from new developments within the Borough. It does not therefore allocate or safeguard any land or sites for net additional dwellings or other types of development that could give rise to increased recreation or urbanisation impacts.</p> <p>As such, there are no pathways for effect for impacts either alone or in-combination with other plans and projects. Therefore, it is considered, at the time of undertaking this assessment and even in the absence of avoidance and/or mitigation measures which cannot be taken into account at the screening stage of HRA that the Affordable Housing SPD will not give rise to likely significant effects on any of the European Sites in terms of recreation or urbanisation and Appropriate Assessment is not required.</p>
Atmospheric Pollution	The Runnymede 2030 Local Plan HRA concludes no likely significant effect as a result of atmospheric pollution in combination with other plans and projects on the Thames Basin Heaths SPA, Thursley, Ash, Pirbright & Chobham SAC or the Windsor Forest &

	<p>Great Park SAC, given the findings of the Council’s air quality evidence.</p> <p>The Affordable Housing SPD provides guidance for delivering already adopted development plan policies at a higher tier (the Runnymede 2030 Local Plan) with the aim of securing planning obligations and affordable housing from new developments within the Borough.</p> <p>Therefore, it is considered, at the time of undertaking this assessment and even in the absence of avoidance and/or mitigation measures which cannot be taken into account at the screening stage of HRA that the Affordable Housing SPD will not give rise to likely significant effects on any of the European Sites in terms of air quality.</p> <p>In this respect an Appropriate Assessment is not required.</p>
Water Quality & Resource	<p>The Runnymede 2030 Local Plan HRA concludes no likely significant effects to European sites as a result of water quality or abstraction.</p> <p>The Affordable Housing SPD provides guidance for delivering already adopted development plan policies at a higher tier (the Runnymede 2030 Local Plan) with the aim of securing planning obligations and affordable housing from new developments within the Borough.</p> <p>It does not however set targets for new developments or allocate or safeguard any land or sites for development including water related infrastructure projects such as the River Thames Scheme or site-specific flood/drainage projects. This is the role of the higher tier Local Plan and as such there are no pathways for effect for impacts either alone or in-combination with other plans and projects.</p> <p>Therefore, it is considered, at the time of undertaking this assessment and even in the absence of avoidance and/or mitigation measures which cannot be taken into account at the screening stage of HRA that the Affordable Housing SPD will not give rise to likely significant effects on any of the European Sites in terms of water quality or resource.</p> <p>In this respect an Appropriate Assessment is not required.</p>

3.8 It is the conclusion of this HRA that following a screening assessment it can be ascertained, in the light of the information available at the time of assessment and

even in the absence of avoidance and mitigation measures that the Affordable Housing SPD **will not** give rise to significant effects on European Sites either alone or in-combination with other plans and/or projects. Given the findings of the screening assessment it is considered that a full appropriate assessment is not required.

4.0 The SEA Screening Process

4.1 The process for determining whether or not an SEA is required is called 'screening'. For some types of plan or programme SEA is mandatory and includes the following:

- Plans which are prepared for town and country planning or land use and which set the framework for future development consent of projects listed in the Environmental Impact Assessment (EIA) Directive; or
- Plans which have been determined to require an assessment under the Habitats Directive (this has already been screened out as set out in paragraphs 1.23 to 1.31 of this screening assessment).

4.2 However, the main determining factor when considering whether a plan or programme requires SEA is whether it will have significant environmental effects.

4.3 Within 28 days of making its determination, the determining authority must publish a statement, such as this one, setting out its decision. If it is determined that an SEA is not required, the statement must include the reasons for this.

4.4 This Screening Report sets out the Council's final determination under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 on whether or not SEA is required for the Affordable Housing SPD. The Borough Council must consult with the three statutory bodies (Environment Agency, Historic England, Natural England) and take their views into account before issuing a final determination. The responses received from the three statutory bodies and how the Council has taken these into account in this final screening determination are set out below in **Table 1-8**.

Table 1-8 Consultation responses from the Statutory Consultees

Statutory Body	Response	Comment & Action
Environment Agency (EA)	No response received.	No change
Historic England (HE)	In the light of the Environmental Assessment of Plans and Programmes Regulations 2004, our view is that a SEA <u>is not</u> required in this instance for the reasons set out in paragraph 4.8 of the Affordable Housing Supplementary Planning Document Strategic Environmental Assessment Screening	No change

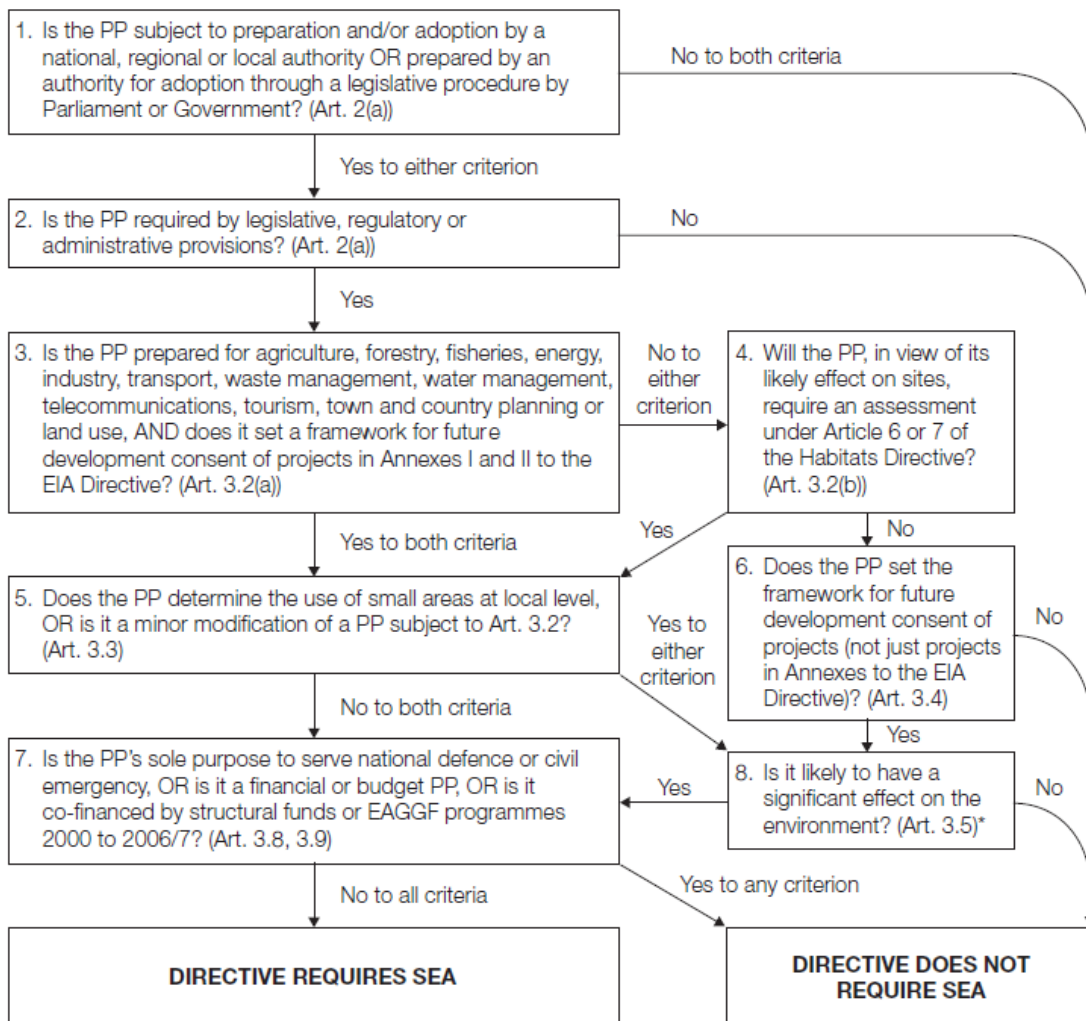
	Statement (October 2021).	
Natural England (NE)	Natural England agrees that The Affordable Housing SPD is unlikely to give rise to significant environmental effects and as such an SEA is <u>not</u> required.	No change.

4.5 This draft determination is based on a two-step approach, the first of which is to assess the plan against the flowchart as set out in government guidance A Practical Guide to the Strategic Environmental Assessment Directive¹. The flow chart is shown in Figure 1.

¹ A Practical Guide to the Strategic Environmental Process (2005) ODPM. Available at: <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

Figure 1:

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

- 4.6 The second step is to consider whether the Affordable Housing SPD will have significant environmental effects when considered against the criteria set out in Annex II of the Directive and Schedule I of the Regulations. The findings of step 1 and step 2 are shown in Tables 1-9 and 1-10.
- 4.7 The second step is to consider whether the Affordable Housing SPD will have significant environmental effects when considered against the criteria set out in Annex

II of the Directive and Schedule I of the Regulations. The findings of step 1 and step 2 are shown in Tables 1-9 and 1-10.

Table 1-9: SEA Screening Step 1

Stage in Flowchart	Y/N	Reason
<p>1. Is the plan/programme subject to preparation and/or adoption by a national, regional or local authority or prepared by an authority for adoption through a legislative procedure by parliament or Government? (Article 2(a))</p>	Y	<p>The provision to prepare and adopt a Local Development Document is given by the Planning & Compulsory Purchase Act 2004 (as amended). The Affordable Housing SPD will be prepared and adopted by Runnymede Borough Council. The preparation and adoption procedure is set out in the Town & Country Planning (Local Development)(England) Regulations 2012. Whilst not forming part of the Development Plan the SPD will be a material consideration in planning decisions. Move to Stage 2</p>
<p>2. Is the plan/programme required by legislative, regulatory or administrative provisions? (Article 2(a))</p>	N	<p>There is no mandatory requirement to prepare or adopt Supplementary Planning Documents and if adopted it will not form part of the Development Plan for Runnymede. As answer is No, flowchart identifies end to screening process, but move to Stage 3 for completeness.</p>
<p>3. Is the plan/programme prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article 3.2(a))</p>	N	<p>Whilst the SPD has been prepared for town and country planning purposes, it does not set policy. The policies that the SPD supplements have been subject to SA/ SEA. Move to Stage 4.</p>

Stage in Flowchart	Y/N	Reason
4. Will the plan/programme, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Article 3.2(b))	N	The HRA screening undertaken in paragraphs 3.1 to 3.8 of this assessment has determined that Appropriate Assessment is not required. Move to Stage 6.
5. Does the plan/programme determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Article 3.3)	N/A	The SPD will not form part of the Runnymede Development Plan and does not therefore determine the use of small areas at a local (or any) level. The plan is not a minor modification of an existing plan. Flowchart identifies moving to stage 7 but move to Stage 6 for completeness
6. Does the plan/programme set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Article 3.4)	N	The SPD does not allocate any land or sites for development or set a framework for future development consents. As answer is No, flowchart identifies end to screening process, but move to Stage 8 for completeness.
7. Is the plan/programme's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Article 3.8, 3.9)	N	The sole purpose of the SPD is not to serve national defence or civil emergency. The SPD is not a budget plan or programme and it is not co-financed by structural funds or EAGGF programmes 2000 to 2006/7.
8. Is it likely to have a significant effect on the environment? (Article 3.5)	N	Effects on the environment and whether these are significant are considered in Table 1-10. No Significant Effects identified in Table 1-10, so determine that SEA is not required.

Table 1-10: SEA Screening Step 2

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)		Response	
Characteristics of the plan or programme			Significant Effect?
(a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The Affordable Housing SPD does not set out policies against which development proposals in the Runnymede area will be considered, although it will be a material consideration in decision making. The guidance provided in the SPD is intended to supplement the policies contained in the Runnymede 2030 Local Plan so that applicants are clear about the Council's expectations and so as to ensure effective and consistent implementation of the relevant affordable housing policies.</p> <p>Whilst the nature of development could be said to be influenced by the SPD, this is only with respect to providing more detailed guidance to that already set out in the higher tier Local Plan policies. As such, it is considered that the SPD only sets a framework for projects to a limited degree.</p>		N
(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	<p>The Affordable Housing SPD does not influence other plans or programmes but is itself influenced by other plans or programmes. It therefore does not influence any plans in a hierarchy.</p>		N
(c) The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.	<p>The Affordable Housing SPD is highly relevant in terms of promoting sustainable development as it seeks to ensure the effective and consistent implementation of affordable housing policies, the aim of which is to provide a range of options to meet the housing needs of the different communities in Runnymede.</p>		N
(d) Environmental	<p>Environmental problems include potential recreational or urbanising impacts, atmospheric pollution and water</p>		N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
problems relevant to the plan or programme.	resources to European sites. Paragraphs 3.1 to 3.8 of this assessment sets out the effects of the SPD on European sites and has determined no significant effects.	
(e) The relevance of the plan or programme for the implementation of Community (EU) legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The Affordable Housing SPD provides guidance on the effective and consistent implementation of Affordable Housing policies in the adopted Runnymede 2030 Local Plan. The SPD does not, allocate any land/development or go beyond the requirements of the 2030 Local Plan and as a consequence its relevance for the implementation of Community (EU) legislation on the environment is likely to be limited.	N
Characteristics of the effects and of the area likely to be affected		
(a) The probability, duration, frequency and reversibility of the effects.	The Affordable Housing SPD seeks to ensure the effective and consistent implementation of affordable housing policies, which in themselves should ensure positive effects relating to affordability within the housing market and access to home ownership for current and future generations. It does not however allocate any land or sites for development or go beyond the requirements of the 2030 Local Plan.	N
(b) The cumulative nature of the effects	The Affordable Housing SPD does not allocate any land or sites for development or go beyond the requirements of the 2030 Local Plan Taken with the allocation of sites in the emerging 2030 Local Plan and the mitigation measures set out therein, cumulative effects with the SPD are likely to be low as the Local Plan will be the main driver for development and change. Cumulative effects are likely to last over the plan period and beyond but could be reversible depending on future iterations of the Local Plan and its priorities. On the whole however, effects are not considered to be significant.	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
(c) The transboundary nature of the effects	The Affordable Housing SPD is not expected to give rise to any significant transboundary environmental effects. However, where strategic sites are in close proximity to neighbouring settlements, the provision of affordable housing will assist in providing housing choices for residents from a wider area as well as from within Runnymede's communities.	N
(d) The risks to human health or the environment (for example, due to accidents)	There are no anticipated effects of the SPD on human health.	N
(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The Affordable Housing SPD will cover the whole of the geographic area of Runnymede in Surrey. The area covered is 78km ² with a population of around 83,448. The effective and consistent implementation of affordable housing policies will have positive benefits for Runnymede residents and those who wish to move to Runnymede.	N
(f) The value and vulnerability of the area likely to be affected due to: i) Special natural characteristics or cultural heritage; ii) Exceeded environmental quality standards or limit values; iii) Intensive land-use.	Given the nature of the Affordable Housing SPD: i) The area covered by the SPD contains 5 SSSIs with the majority in a favourable condition status which meets the PSA target of 95% in favourable or unfavourable recovering condition status. The Basingstoke Canal SSSI is in an unfavourable no change status which does not meet the PSA target. The Runnymede area contains numerous statutorily or locally listed buildings and structures as well as conservation areas, scheduled ancient monuments and areas of high archaeological potential. The area is a mixture of urban and Green Belt and contains features such as green spaces, wooded copses and golf courses. However, the SPD does not allocate any land for development, set development targets or go beyond the requirements of the 2030 Local Plan and therefore significant effects on natural characteristics and cultural heritage are unlikely.	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
	<p>ii) There are two Air Quality Management Areas (AQMAs) in the Runnymede area, along the entire length of the M25 which runs through the Borough and the other in Addlestone at the High Street and Station Road junction. Air quality standards are exceeded at 5 air quality monitoring sites in the Runnymede area². The Environment Agency has identified the Wey catchment as having restricted water available for licensing. However, the SPD does not allocate any land for development, set development targets or go beyond the requirements of the 2030 Local Plan and therefore significant effects on air quality and water availability/quality are unlikely.</p> <p>iii) Intensive land use occurs in the urban areas (built development), but the SPD does not allocate any land or sites for development. As such, significant effects are unlikely.</p>	
(g) The effects on areas or landscapes which have recognised national, community or international protection status.	The effects on European Sites for Nature Conservation are dealt with in (d) above. There are no landscapes which have recognised national, community of international protection status in the Runnymede area.	N
Conclusion	The Affordable Housing SPD is unlikely to give rise to significant environmental effects and as such an SEA is not required.	

4.8 On the basis of the Screening process, it is determined that the Affordable Housing SPD does not require a SEA under the SEA Directive and Environmental Assessment of Plans and Programmes Regulations (2004). This is because:

- The SPD is unlikely to give rise to significant environmental effects given that it does not allocate sites or development or go beyond the requirements of the 2030 Local Plan; and

² Runnymede 2017 Air Quality Annual Status Report (2017) RBC, Available at: <https://www.runnymede.gov.uk/airquality>

- The content of the SPD when taken as a whole and in combination with policies in the emerging 2030 Local Plan will not give rise to significant effects.
- 4.9 This final assessment was made on the 7th March 2022. A number of minor amendments were made to the earlier assessment, undertaken on the 25th October 2021. These changes were primarily to take account of the comments received from the statutory consultees and to also respond to a point raised at the Committee Meeting on 24th November 2021 that a reference should be included in Table 1.1 of the final assessment, under Other Key Plans/ Projects, to the 'made' Thorpe Neighbourhood Plan. This change has been made to the screening report.
- 4.10 A further change that was suggested at the Committee Meeting on the 24th November 2021 was that in Table 1.10 in SEA -characteristics of the effects and of the area likely to be affected- (f) AQMAs-add 'additional' in last sentence of response ii. This change has not been made to the final assessment as it is not considered that this change would be factually correct. The sentence in the earlier assessment stated that "the SPD does not allocate any land for development". This statement is correct. It is the Runnymede 2030 Local Plan which allocates sites for development (see para. 1.7 above). The allocated sites from the Local Plan have already been subject to SEA/HRA as part of the Local Plan process. SPDs can only provide guidance on adopted policies and not allocate land for development. It would therefore be incorrect to insert the word 'additional' in this sentence.
- 4.11 The conclusions of the assessment remain unaltered by these updates to the screening report.

EQUALITY SCREENING

Equality Impact Assessment guidance should be considered when completing this form.

POLICY/FUNCTION/ACTIVITY	LEAD OFFICER
Affordable Housing Supplementary Planning Document (SPD)	Judith Orr

A. What is the aim of this policy, function or activity? Why is it needed? What is it hoped to achieve and how will it be ensured it works as intended? Does it affect service users, employees or the wider community?

The aim of the Affordable Housing Supplementary Planning Document (SPD) is to seek to ensure the effective and consistent implementation of affordable housing policies in the Borough.

The Affordable Housing SPD aids the effective implementation of the Council’s Spatial Development Strategy and the Affordable Housing Policies in the adopted Runnymede 2030 Local Plan (July 2020) notably, policies:

- **SL19: Housing Mix and Size Requirements**
- **SL20: Affordable Housing**

and as such, it is a fundamental part of the planning policy ‘toolkit’.

The SPD sets out in detail, how affordable housing will be delivered through the planning application process. It provides detailed guidance on the mix, size and tenure of affordable housing units and how this should be calculated; design considerations for affordable housing schemes; viability appraisals and how these should be conducted and what should be contained in legal agreements involving affordable housing. The SPD also includes a template for a s106 agreement for affordable housing and worked examples of affordable housing calculations, where practicable.

The document will be adopted as a supplementary planning document and will be an important material consideration for the determination of planning applications.

The SPD will not affect any employees or service users on the basis of (a) protected characteristic(s) they have. Any effects it has on the wider Borough community, including those groups with protected characteristics are likely to be beneficial in that the SPD will result in more effective delivery of Affordable Housing and ensuring that it is secured in perpetuity through the planning system.

B. Is this policy, function or activity relevant to equality? Does the policy, function or activity relate to an area in which there are known inequalities, or where different groups have different needs or experience? Remember, it may be relevant because there are opportunities to promote equality and greater access, not just potential on the basis of adverse impacts or unlawful discrimination. The Protected Characteristics are: Sex, Age, Disability, Race, Religion and Beliefs, Sexual Orientation, Marriage and Civil Partnership, Gender Reassignment, Pregnancy and Maternity.

It is not considered that there will be any potential negative impacts on any protected characteristics if the Affordable Housing SPD were to be adopted. The SPD aims to make the housing market more affordable for both renting and other forms of low-cost affordable home ownership. As such, this is likely to bring positive impacts to those with the protected characteristics of race, disability, sex and age.

It is however, anticipated that there will be positive impacts on anyone seeking housing within the Borough particularly those with the protected characteristics of race, disability, gender and age. The Affordable Housing SPD is therefore likely to have a positive impact on health and well-being, including mental health and the well-being of lower paid Runnymede residents.

Continued monitoring of the Affordable Housing SPD will take place after it is adopted which may reveal any positive or negative impacts that exist and will assist officers in providing measures that seek to mitigate any negative impacts on any of the protected characteristics. In this respect the SPD would be reviewed within 5 years of adoption if monitoring reveals any negative impacts on protected characteristics.

If the policy, function or activity is considered to be relevant to equality then a full Equality Impact Assessment may need to be carried out. If the policy function or activity does not engage any protected characteristics then you should complete Part C below. Where Protected Characteristics are engaged, but Full Impact Assessment is not required because measures are in place or are proposed to be implemented that would mitigate the impact on those affected or would provide an opportunity to promote equalities please complete Part C.

C. If the policy, function or activity is not considered to be relevant to equality, what are the reasons for this conclusion? Alternatively, if there it is considered that there is an impact on any Protected Characteristics but that measures are in place or are proposed to be implemented please state those measures and how it/they are expected to have the desired result. What evidence has been used to make this decision? A simple statement of 'no relevance' or 'no data' is not sufficient.

It is not considered that a full EqIA is required for the following reasons:

- **It is not anticipated that the implementation of the SPD will have a negative impact on any of the nine protected characteristics.**
- **The SPD is likely to have positive impacts on the protected characteristics of race, disability, gender and age, by ensuring that future developments will make increased provision for affordable housing. This is likely to have a positive impact on health and well-being, including mental health and the well-being of lower paid Runnymede residents.**
- **The SPD will provide detailed guidance and advice to ensure effective and consistent implementation of the relevant affordable housing policies. It is fully consistent and complementary to the adopted Runnymede 2030 Local Plan, which has had a detailed EqIA undertaken at each stage of Plan preparation. The Affordable Housing SPD provides detailed guidance to help implement the requirements of Policies SL19 and SL20 and the site allocation policies of the Runnymede Local Plan which has already been assessed under EqIA to have either positive or neutral impacts on protected characteristics of the population.**

Date completed: 21/03/2021

Sign-off by senior manager: Georgina Pacey

Consultation of Draft Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Scoping Report for the 2040 Local Plan (Planning, Policy & Economic Development -John Devonshire)

Synopsis of report:

The purpose of this report is to inform Members of the preparation of a draft Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) Scoping Report for the 2040 Local Plan.

SA/SEA is now an established mechanism for assessing the sustainability and environmental performance of plans and programmes such as the Runnymede 2040 Local Plan and is a legal requirement under the Planning & Compulsory Purchase Act 2004 and Environmental Assessment of Plans & Programmes Regulations 2004 (SEA Regulations).

The first stage of SA/SEA is the scoping stage which seeks to understand key messages/objectives from other legislation and guidance, establish the baseline environment and how this might change in the future in the absence of the 2040 Local Plan. The SA/SEA Scoping should also identify any issues and problems arising from the key messages and baseline information and how these may be addressed in the 2040 Local Plan. The Scoping Report should also include a Sustainability Framework, which will be used to assess and analyse the sustainability/environmental performance of plan options and policies.

A draft version of the SA/SEA Scoping Report has been prepared in-house. The SEA Regulations require that when deciding on the scope and level of detail of the assessment the consultation bodies (Environment Agency, Historic England, Natural England) shall be consulted for a period of 5 weeks.

As such, this report seeks approval from the Planning Committee to carry out consultation on the draft SA/SEA Scoping Report for a period of 5 weeks with the consultation bodies as well as taking the opportunity to consult with the general public as well. Consultation will run from 22nd April to 27th May 2022.

The draft SA/SEA scoping report:

- Identifies other relevant legislation/guidance and their sustainability/environmental objectives/key messages;
- Establishes the baseline environment across a number of topic areas;
- Predicts the evolution of the sustainability/environmental baseline in the absence of the 2040 Local Plan;
- From the key messages/objectives and baseline, identifies sustainability issues/problems the 2040 Local Plan should seek to address;
- Sets out the Sustainability Framework, against which the sustainability of plan options and policies will be assessed.

Recommendation(s): The Planning Committee is recommended to RESOLVE to:

- i) APPROVE the draft Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) for public consultation for a period of five weeks.

1. **Context of report**

- 1.1 The preparation of Local Plan documents must be subject to an assessment of their sustainability and environmental performance through Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). A review of the Runnymede 2030 Local Plan has commenced with it being expected that a partially updated Local Plan will be required, which will cover the period 2025-2040. Each stage of plan preparation must be accompanied by an SA & SEA assessment.
- 1.2 The requirement to undertake SA is set out in Section 19 of the Planning & Compulsory Purchase Act 2004 and SEA by the Environmental Assessment of Plans & Programmes Regulations 2004 (SEA Regulations).
- 1.3 SA/SEA is an iterative process. The process helps to test evidence and also to develop plan options, preferred approaches and plan policies. Guidance on undertaking SA/SEA at each stage of plan preparation is set out in the Government's Planning Practice Guidance (PPG) note on SA/SEA.
- 1.4 The PPG note on SA/SEA identifies that the first stage of SA/SEA is scoping, which should be undertaken at the same time as the preparatory/evidence gathering stage of plan making. The note also identifies what must be included at the scoping stage and this includes:
- i) Identification of other relevant policies, plans and programmes, and sustainability objectives;
 - ii) Collection of baseline information;
 - iii) Identification of sustainability issues & problems;
 - iv) Development of the Sustainability Appraisal Framework;
 - v) Consulting with the consultation bodies on the scope of the sustainability appraisal report
- 1.5 Schedule 2 of the SEA Regulations also sets out what must be included within an environmental report.

2. **Report and options considered**

- 2.1 The purpose of this report is to inform Members of the preparation of a draft SA/SEA Scoping Report. A copy of the draft Scoping Report can be found at Appendix A.
- 2.2 The draft Scoping Report has been undertaken in line with the Government's guidance set out in the PPG note on SA/SEA and includes signposts to how it addresses the requirements of the SEA Regulations. The scoping report is set out in a number of topic/thematic areas, which roughly follow the themes set out in Schedule 2 of the SEA Regulations. The Scoping Report also identifies the baseline environment for each topic/thematic area and its predicted evolution, in the absence of the 2040 Local Plan.
- 2.3 How the scoping report addresses the PPG note on SA/SEA is as follows:
- Identification of other relevant policies, plans and programmes, and sustainability objectives – Section 2 of the report summarises the review undertaken of relevant policies, plans and programmes and their key messages/objectives. The full review is set out in Appendix A of the scoping report;
 - Collect baseline information – Sections 3 to 14 set out the baseline of the receiving environment and its predicted evolution in the absence of the plan;

- Identify sustainability issues & problems – Sections 3 to 14 identify sustainability issues and problems by topic/thematic area;
- Develop the Sustainability Appraisal Framework – Section 15 includes the Sustainability Framework. The SA Framework for the Runnymede 2030 Local Plan has been used as the basis for the 2040 Local Plan as it is largely considered fit for purpose. However, amendments are proposed to the Framework to reflect relevant policies, plans and programmes, baseline environment and the issues/problems identified. The changes proposed to the SA Framework from the 2030 Local Plan are highlighted in red text for ease of reading.
- Consult the consultation bodies on the scope of the sustainability appraisal report – The purpose of this report.

2.4 It is proposed that the draft SA/SEA Scoping Report, set out in Appendix A to this report, should be sent to the three consultation bodies (Environment Agency, Historic England, Natural England) for consultation, for a period of five weeks, as required by the SEA Regulations. It is also considered that the opportunity should be taken to open the SA/SEA Scoping Report to public consultation at the same time. Consultation would run from 22nd April to 27th May 2022.

2.5 Following consultation, any responses received would be carefully considered and, where appropriate, changes made to the draft report. The final scoping report is expected to be issued in the Summer of 2022.

3. **Policy framework implications**

3.1 SA/SEA forms part of the evidence base for the Local Plan, rather than being part of the development plan itself. However, SA/SEA is a requirement of the plan making process and must be undertaken at each stage of plan preparation, including the preparatory/evidence gathering stages.

4. **Financial and resource implications**

4.1 Production of the draft SA/SEA Scoping has been undertaken in-house by the Planning Policy Team. Further iterations of the SA/SEA work will be undertaken by consultants on behalf of the Council and funded through the agreed Planning Policy budget for each financial year. There are no additional resource implications beyond those already provided for within the agreed Planning Policy budget.

5. **Legal implications**

5.1 The preparation of SA/SEA reports to accompany Local Plans is a legal requirement under Section 19 of the Planning & Compulsory Purchase Act 2004 and the Environmental Assessment of Plans & Programmes Regulations 2004.

6. **Equality implications**

6.1 The Council has a Public Sector Duty under the Equalities Act 2020 to have due regard to the need to:

- a) Eliminate unlawful discrimination, harassment or victimisation;

- b) Advance equality of opportunity between persons who share a Protected Characteristic and persons who do not share it;
- c) Foster good relations between those who share a relevant characteristic and persons who do not share those characteristics;

in relation to the 9 'Protected Characteristics' stated within the Act.

6.2 The draft SA/SEA Scoping Report is not a policy document, rather it is evidence to support the Local Plan and, as such, has not been subject to equalities impact screening.

7. **Environmental/Sustainability/Biodiversity Implications**

7.1 The draft SA/SEA Scoping report sets out current sustainability/environmental baseline information for Runnymede and how it is predicted to evolve over time, in the absence of the 2040 Local Plan. Sustainability issues and problems have also been identified in the Scoping Report. These issues and problems will have implications for the 2040 Local Plan, which will need to address them.

8. **Other Implications**

8.1 None.

9. **Conclusion**

9.1 Planning Committee is asked to RESOLVE to:

- i) **APPROVE** the draft Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) for public consultation for a period of five weeks.

(To resolve)

Background papers

Appendix A: Draft SA/SEA Scoping Report

Runnymede 2040 Local Plan

**Draft Sustainability Appraisal incorporating
Strategic Environmental Assessment**

Scoping Report

April 2022

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Foreword

The Runnymede 2040 Local Plan will set out the quantum of development expected to come forward within Runnymede up to 2040 including housing, employment and retail development as well as allocating land for development. It will also contain the policies against which individual planning applications will be considered and along with other plans such as Neighbourhood Plans and the Minerals and Waste Plans for Surrey form the Development Plan for the Runnymede area.

The 2040 Local Plan will be built on a review and where necessary an update of the 2030 Local Plan in accordance with paragraph 33 of the National Planning Policy Framework (NPPF) 2021 which requires that local plans and spatial development strategies be reviewed to assess whether they need updating at least once every five years.

In reviewing the 2030 Local Plan, the Council may update or roll forward some, all or none of the policies/allocations of the 2030 Local Plan depending on whether they are still necessary and up to date and can if it wishes to do so, introduce new policies.

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are now an integral part of producing planning documents. The purpose of SA/SEA is to consider the likely economic, social and environment effects of implementing a plan or programme and any reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme.

This SA/SEA Scoping Report of the 2040 Local Plan is the first stage of SA/SEA. In essence this report will:

Identify other relevant plans, policies and programmes and their key messages/objectives; collect and review sustainability and environmental baseline data and trends; identify any social, economic and environmental issues and problems; and set out the SA/SEA objectives and the Sustainability Framework for future iterations.

This SA/SEA Scoping Report is open to consultation from Friday 22nd April to Friday 27th May 2022. Any comments should preferably be returned by e-mail to planningpolicy@runnymede.gov.uk or alternatively can be posted to: -

Planning Policy and Economic Development
Runnymede Borough Council
Runnymede Civic Centre
Station Road
Addlestone
Surrey KT15

Please note, comments will be publicly available and cannot be treated as confidential. Details of addresses and telephone numbers will not be published on our website but names, organisations and comments will.

Your comments and ongoing consultation with key stakeholders will help us to write the 2040 Local Plan and inform future SA/SEA Reports.

If you have any queries or require any further information please call the Planning Policy Team on 01932 425131 or email planningpolicy@runnymede.gov.uk

1. Introduction & Methodology

Sustainable Development

- 1.1 There are many definitions of sustainable development however the most common and widely accepted is that adopted by the World Commission on Environment and Development's 1987 Brundtland report 'Our Common Future' as:

"Development that meets the needs of the present without compromising the ability of future generations to meet their own needs"

- 1.2 There is now an international commitment to achieving sustainable development through the 2030 Agenda for Sustainable Development, a global agreement reached through the UN which sets out 17 sustainable development goals. The goals have been set out in the UK Government's Agenda 2030: Delivering the Global Goals¹ which also sets out a number of priority outcomes relevant to the Local Plan making process such as:

- building confidence in the transport network and ensure it is safe, reliable and inclusive;
- tackle climate change and improve air quality by decarbonising transport;
- improve the environment through cleaner air and water, minimised waste and thriving plants and terrestrial and marine wildlife;
- reduce UK greenhouse gas emissions to net zero by 2050;
- deliver economic growth to all nations and regions of the UK through attracting and retaining inward investment;
- more better quality, safer, greener and more affordable homes;
- reduce the likelihood and impact of flooding and coastal erosion on people, businesses, communities and the environment;

- 1.3 The principles of sustainable development are also set out within the National Planning Policy Framework (NPPF)². Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives as follows:

- an economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

¹ Agenda 2030: Delivering the Global Goals (2017) Department for International Development. Available at: <https://www.gov.uk/government/publications/agenda-2030-delivering-the-global-goal>

² National Planning Policy Framework (2021) MHCLG. Available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 1.4 The NPPF explains that these three objectives are interdependent and need to be pursued in mutually supportive ways, so that opportunities can be taken to secure net gains across each objective.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.5 Section 19(5) of the Planning & Compulsory Purchase Act 2004 (as amended) requires that an appraisal of the sustainability of Local Plans is undertaken with a report of the findings prepared. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which implement the provisions of the Planning and Compulsory Purchase Act 2004 requires the submission of an SA report of the Local Plan.
- 1.6 Under the Environmental Assessment of Plans & Programmes Regulations 2004 (hereafter referred to as the SEA Regulations), specific types of plans that are likely to have significant environmental effects must be subject to environmental assessment. There are exceptions to this requirement for plans that determine the use of a small area at a local level and for minor modifications if it has been determined that the plan is unlikely to have significant environmental effects.
- 1.7 In accordance with the provisions of the SEA Regulations, Runnymede Borough Council has determined that an SEA is required for 2040 Local Plan as it considers that it sets the framework for future development consent, is not for the use of a small area at a local level or only prescribes minor modifications. As such an SEA of the Local Plan is required and will be combined with the SA as the two processes align with one another.
- 1.8 The Borough Council also considers that the 2040 Local Plan requires an assessment as to its effect on the National Site Network (formerly known as Natura 2000 sites) of biodiversity importance such as Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites. This will be set out in a separate Habitats Regulation Assessment (HRA) at the draft plan stage of plan preparation (Regulation 19 stage).

The Purpose of SA/SEA

- 1.9 The purpose of SA/SEA is to identify and assess the likely significant social, economic and environmental effects of implementing a plan or programme including an assessment of alternative options or approaches.
- 1.10 For the Scoping Assessment of SA/SEA, the purpose is to describe the current social, economic and environmental status of the area, identify any social, economic and/or environmental problems/issues which the 2040 Local Plan could help to address and the identification of a Sustainability Framework. The Sustainability Framework is a series of social, economic and environmental objectives against which future plan options and approaches will be appraised.

The SA/SEA Methodology

- 1.11 Paragraph 013 of the Planning Practice Guidance (PPG) on Strategic Environmental Assessment & Sustainability Appraisal³ sets out a flowchart highlighting the process to follow at each stage of SA/SEA. The flowchart sets out five stages (stages A to E) which is shown in Table 1-1.

Table 1-1: Stages of Sustainability Appraisal

Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope
Stage B	Developing and refining alternatives and assessing effects
Stage C	Preparing the Sustainability Report (including requirements of SEA)
Stage D	Seek representations on the Sustainability Appraisal Report
Stage E	Post adoption reporting & monitoring

- 1.12 This SA/SEA Report focuses on stage A in the flowchart, set out in paragraph 013 of the PPG, namely the Scoping stage. The key tasks to be undertaken at each stage of the Scoping exercise are highlighted in the PPG flowchart and repeated in Table 1-2. In terms of Stages B, C & D in Table 1-1, this is an iterative process and will be undertaken at Issues & Options and draft Local Plan stages of plan preparation (Regulation 18 & 19 stages) with Stage E undertaken following adoption of the 2040 Local Plan.

Table 1-2: Stage A – Key Tasks

A1	Identify other relevant policies, plans & programmes, and sustainability objectives
A2	Collect baseline information
A3	Identify sustainability issues & problems
A4	Develop the sustainability appraisal framework
A5	Consult the consultation bodies on the scope of the Sustainability Appraisal Report

- 1.13 In addition to the stages and tasks set out in Tables 1-1 and 1-2, the SEA Regulations require certain information to be covered by the environmental report (or SA Report). In order to ensure compliance with the SEA Regulations it is necessary to highlight which sections of this report cover the criteria required by an environmental report as set out within the SEA Regulations. Paragraph 004 of the PPG on SEA & SA sets out an SEA Regulations requirements checklist which is reproduced in Table 1-3. Table 1-3 also identifies where in the report these requirements have been dealt with and those which will be left to future iterations of the SA/SEA process.

³ Planning Practice Guidance: Strategic Environmental Assessment & Sustainability Appraisal (MHCLG) 2020. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Table 1-3: Compliance with the SEA Regulations

SEA Regulations Requirement	Section of Scoping Report
Schedule 2	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Sections 1 & 2 of this report and Appendix A.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Sections 3 to 14 of this report
c) The environment characteristics of areas likely to be significantly affected.	Sections 3 to 14 of this report
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).	Sections 3 to 14 of this report
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Sections 2-14 of this report and Appendix A
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	N/A at scoping stage. To be included in future iterations of SA/SEA
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	N/A at scoping stage. To be included in future iterations of SA/SEA
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	N/A at scoping stage. To be included in future iterations of SA/SEA
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	N/A at scoping stage. To be included in future iterations of SA/SEA
j) A non-technical summary of the information provided under the above headings.	N/A at scoping stage. To be included in future iterations of SA/SEA
Preparation of environmental report that identifies describes & evaluates likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (Regulation 12(2)).	Geographical scope of Local plan included in Section 1. Other aspects to be included in future iterations of SA/SEA.

<p>Report shall include such of the information referred to in Schedule 2 as reasonably required, taking into account current knowledge, methods of assessment, contents and level of detail in the plan or programme, stage in the decision-making process and extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making (regulation 12(4)).</p>	<p>See above where applicable</p>
<p>When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted (regulation 12(5)).</p>	<p>Consultation of Scoping Report with statutory bodies to be undertaken</p>
<p>As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.</p>	<p>N/A at Scoping stage but Scoping Report sent to consultation bodies and open to public consultation</p>
<p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State shall be informed and the following made available:</p> <ul style="list-style-type: none"> • the plan or programme adopted • the environmental report • a statement summarising: <ul style="list-style-type: none"> (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16) 	<p>N/A at Scoping stage. To be undertaken after adoption of the Local Plan.</p>
<p>Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>N/A at scoping stage. To be included in future iterations of SA/SEA</p>

Area Description

- 1.14 The Borough of Runnymede lies around 20 miles south west of central London in the north-west corner of Surrey. The Borough adjoins the Surrey authorities of Spelthorne to the north, Elmbridge to the east, Woking to the south as well as Surrey Heath and the Royal Borough of Windsor & Maidenhead in Berkshire to the west. The eastern half of the Borough is mainly urban in character containing the main settlements of Addlestone, Chertsey, Egham and smaller settlements of Thorpe, Woodham & New Haw. The western half has a more dispersed pattern of development containing the smaller settlements of Englefield Green, Longcross, Lyne, Ottershaw and Virginia Water. Each settlement area is surrounded by and separated from each other by the Green Belt which covers the rest of the Borough outside of its urban areas. In total the Borough covers some 78 square kilometres.
- 1.15 Outside of its urban areas, the Borough can be defined by four main landscape types⁴. The east of the Borough is defined by river floodplain and river valley which has been subject to urban development and mineral extraction over time. The western area of the Borough is characterised by settled & wooded sandy farmland and sandy woodland which lie close to areas of lowland heathland outside of the Borough forming part of the Thursley, Ash, Pirbright and Chobham Common Special Area of Conservation (SAC) which forms part of the wider Thames Basin Heaths Special Protection Area (SPA). Chobham Common is also a National Nature Reserve (NNR). There are numerous areas of ancient woodland, predominantly in the west of the Borough as well as priority habitat comprised mostly of deciduous woodland and lowland meadows.
- 1.16 There are five Sites of Special Scientific Interest (SSSI) in the Borough, two of which at Windsor Forest and at Thorpe Park no.1 Gravel Pit have also been designated at an international level and form part of the Windsor Forest & Great Park Special Area of Conservation (SAC) and the South West London Waterbodies Special Protection Area (SPA) and Ramsar. SACs and SPAs were collectively previously known as Natura 2000 sites but are now known as the National Site Network upon the UK exiting the EU. The other three SSSI are Langham Pond at Englefield Green, Thorpe Hay Meadow in Thorpe and part of the Basingstoke Canal in Woodham.
- 1.17 There are also numerous locally designated Sites of Nature Conservation Importance (SNCI) and two designated Local Nature Reserves (LNR) at Riverside Walk in Virginia Water and Chertsey Meads in Chertsey which also functions as Suitable Accessible Natural Greenspace (SANG) as mitigation for the Thames Basin Heaths SPA along with other SANG areas in the Borough at St Ann's Hill in Chertsey and Homewood Park, Timber Hill, Hare Hill and Queenswood in Ottershaw. St Ann's Hill is also designated as a Park & Garden of Special Historical Interest as is St Ann's Court, Woburn Farm in Addlestone, Windsor Great Park: Virginia Water Lake, Savill Gardens & Valley Garden in Englefield Green/Virginia Water, Great Fosters in Egham, the Kennedy Memorial Landscape in Englefield Green. The Borough also contains Runnymede Meadows, the historic site of the signing of Magna Carta in 1215.
- 1.18 Other heritage assets in the Borough include the Grade I listed Royal Holloway College, Royal Holloway Sanitorium and Runnymede Park as well as a number of Grade II* and Grade II listed and locally listed buildings and structures. There are also eight Scheduled Ancient Monuments and six conservation areas as well as numerous areas of high archaeological importance.

⁴ Surrey Landscape Character Assessment (HDA) 2015. Available at: <https://www.surreycc.gov.uk/land-planning-and-development/countryside/strategies-action-plans-and-guidance/landscape-character-assessment>

- 1.19 The eastern and northern boundaries of the borough are formed by the river Thames and river Wey and consequently much of the eastern area of the Borough falls within the functional floodplain and/or areas at a greater risk of fluvial flooding.
- 1.20 The M25 and M3 motorways are major strategic transport routes which cross through the Borough north/south and east/west. Other major highways which run through the Borough include the A30 from the Blackwater Valley to Egham, the A320 which connects Woking with Junction 11 of the M25 and Chertsey through to Staines-upon-Thames, the A317 which connects Junction 11 of the M25 to Weybridge and the A318 connecting Byfleet with Addlestone and Junction 11 of the M25.
- 1.21 Runnymede is served by six rail stations at Addlestone, Byfleet & New Haw, Chertsey, Egham, Longcross and Virginia Water. Egham, Longcross and Virginia Water are served by the Reading-Waterloo route, Addlestone and Chertsey by the Weybridge-Waterloo route and Byfleet & New Haw by the South West main line.
- 1.22 Heathrow Airport lies around 4km to the north east of the Borough at its closest point and is a major airport for both commercial passenger and freight flights. Fair Oaks Airport lies to the south-west of Ottershaw just across the Borough boundary in Surrey Heath and is used for private flights and training.
- 1.23 The Borough is served by three town centres at Addlestone, Chertsey and Egham which are the main retail centres for the Borough and along with five strategic employment areas in Addlestone, Chertsey, Egham and Longcross are the main centres for employment in the Borough along with St Peter's Hospital in Chertsey.

The Runnymede 2040 Local Plan

- 1.24 The Runnymede 2040 Local Plan will be the document which sets out Runnymede's growth ambitions over the years 2025-2040. It will set out a vision for the Borough and contain a number of objectives on how to reach that vision as well as set out the expected number of new homes, employment and retail floorspace and infrastructure to come forward over that period. The 2040 Local Plan will also allocate land for development and set out a number of strategic and local policies to guide growth in the Borough and to determine planning applications.
- 1.25 The 2040 Local Plan will be born from a review of the current 2030 Local Plan adopted in July 2020. The review will consider whether the vision and objectives of the 2030 plan require updating and whether the spatial strategy directing where development will be focussed requires revisiting/amending. It will also review the policies for development needs, including housing, employment and retail based on up-to-date evidence and whether an adjustment is required to targets and whether additional land allocations will be required. The review will also consider whether any of the 2030 plan policies need updating; deleting if they are considered no longer relevant or whether any new policies should be added.
- 1.26 In the main, the 2040 Local Plan policies will be strategic in nature, setting the parameters for development needs across the Borough and which would need to be reflected in Neighbourhood Plans. However, it will also update or include new local policies for the Borough or specific topics. These local policies would sit alongside any made Neighbourhood Plan policies but be non-area specific, leaving Neighbourhood Plans to make their own area specific local policies.
- 1.27 It is important to set out at this stage what the 2040 Local Plan must do, what it can't do and what ideally it should do.

- 1.28 The 2040 Local Plan must set out a vision and objectives for the Borough as well as the strategic planning policies to guide development up to 2040. The policies themselves will be derived from the 2030 Local Plan but reviewed to ensure they reflect up to date evidence on development needs and the most recent National Planning Policy Framework (NPPF) on issues such as housing, employment and retail as well as the natural and historic environments. As such, the review must consider whether each policy in the 2030 Local Plan is up to date and/or requires adjustment, deletion or the addition of any new policies. If the review determines that additional development is required over and above that expressed within the 2030 Local Plan, the 2040 Local Plan must also consider allocating land to meet development needs.
- 1.29 The 2040 Local Plan must also contribute to the mitigation and adaptation of climate change. The review must also consider the social, economic and environmental effects of the plan and any significant issues that arise, including where mitigation may be required through this Sustainability Appraisal process and the impact of the Plan on the National Site Network through a Habitats Regulations Assessment.
- 1.30 The 2040 Local Plan should also ideally set out information regarding what will be expected on any allocated land, for example by setting out policies which include site capacity, infrastructure requirements, phasing etc. This will help to guide future planning applications.
- 1.31 The 2040 Local Plan cannot allocate land or guide development outside the geographic scope of the Local Plan area. It also cannot pursue policies for issues or problems which are beyond the scope of planning to deal with, such as financial matters, agricultural practices, animal welfare etc.
- 1.32 The area of Runnymede in its wider surrounds is shown in Figure 1 and the geographic scope of the 2040 Local Plan is shown in Figure 2.

Figure 1: Runnymede in Wider Context

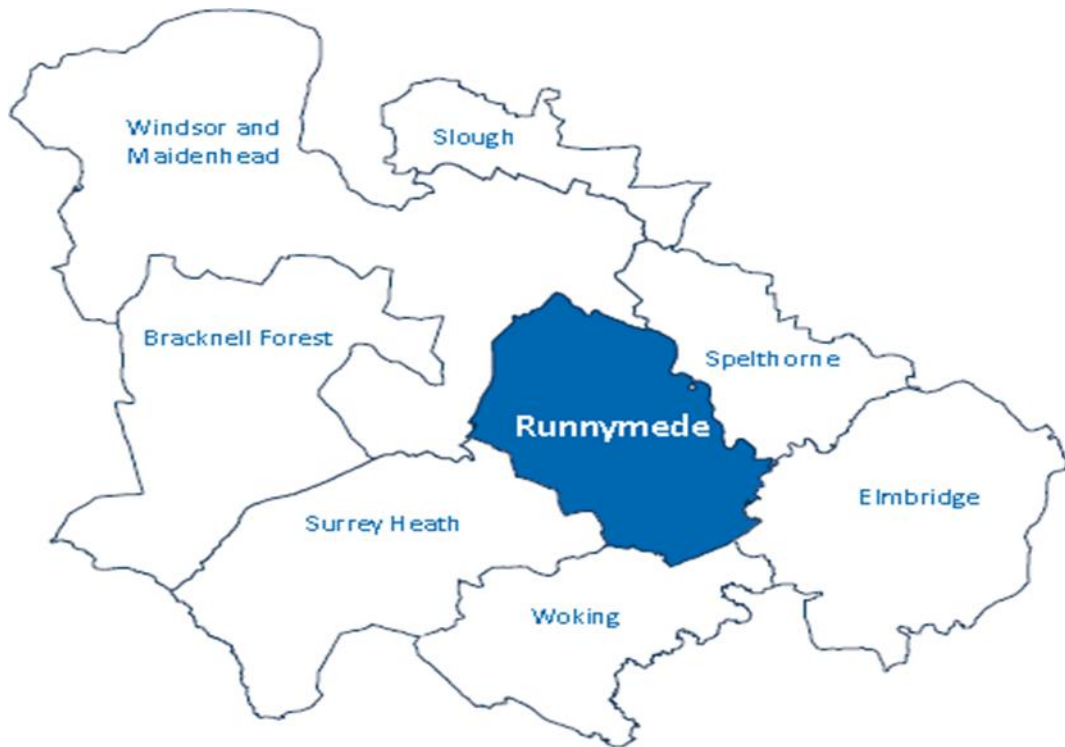
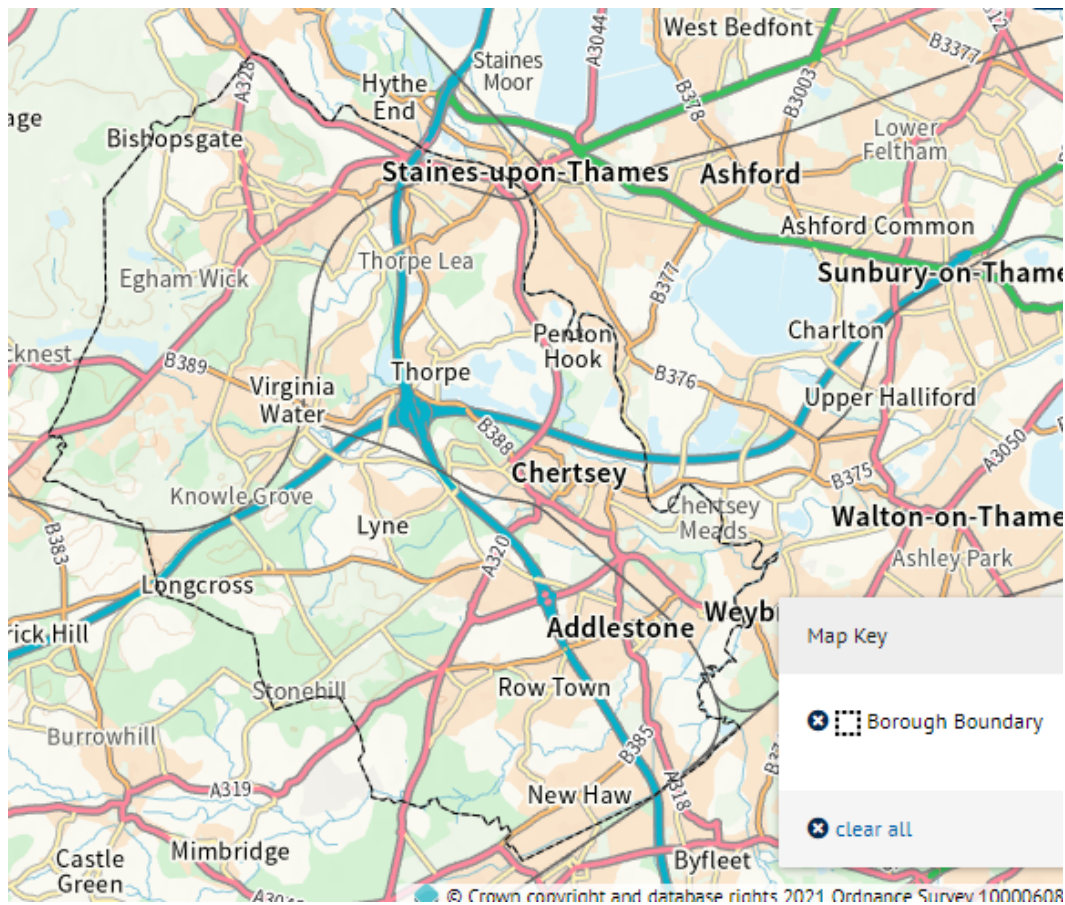


Figure 2: Geographic Scope of the Runnymede 2040 Local Plan



SA/SEA and the 2040 Local Plan

1.33 This SA/SEA Scoping Report forms the first stage of SA/SEA for the Runnymede 2040 Local Plan and deals with in turn each of the tasks identified in Table 1-2. This Scoping Report uses the Sustainability Appraisal (including SEA) Scoping Report prepared for the Runnymede 2030 Local Plan in 2014 as a starting point and updates and builds on the information in that report.

Consultation

1.34 This SA/SEA Scoping Report is open to consultation from X to X. Comments received on this SA/SEA Scoping Report will be considered and fed into future iterations of Sustainability Appraisal where appropriate. The next iteration of SA/SEA will be prepared alongside the 2040 Local Plan Issues & Options Document which is planned for consultation Autumn 2022.

2. Review of Relevant Plans, Policies & Programs

Introduction

- 2.1 The scoping stage of SA/SEA involves establishing the context in which the 2040 Local Plan is being prepared. This requires the identification and review of other relevant plans or programmes, assessing the social, economic and environmental baseline and future trends in the absence of the 2040 Local Plan, identifying environmental problems and setting the Sustainability Framework. These aspects are set out within this section.
- 2.2 In reviewing plans and programmes the most relevant to the 2040 Local Plan have been reviewed for their sustainability/environmental objectives or key messages as updated from the 2014 Scoping Report. A summary of the key messages and objectives of relevant plans and programmes are set out in Table 2-1 with the full table set out in Appendix A. This has taken account of Schedule 2 of the SEA Regulations which require:
- An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;
 - The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.
- 2.3 The Government abolished Regional Strategies (in the south east of England this was the South East Plan) in 2012 but saved several policies from the Plan which are still in force. As such, relevant saved policies from the South East Plan still remain part of the statutory development plan and have therefore been taken into account in the list of plans and programmes.
- 2.4 Since the last Scoping Report was published in 2014 the UK has left the European Union (EU). A number of EU policies, plans and programmes (PPPs) were cited in the last Scoping Report which no longer apply to the UK, however a number of EU PPPs have been transposed into UK law or other policies and are still relevant. Where this is the case the UK PPP and its key messages/objectives will be cited where relevant but not the EU publication.

Table 2-1: Relevant Plans and Programmes and Sustainability Objectives/Key Messages

Summary of other Plans, Policies & Programmes Objectives and Key Messages
<p>Summary of the Local Plan’s (LP) relationship to Biodiversity</p> <p>The review of the Local Plan should, as far as it is able to do so, retain, strengthen or include policies/actions to aid in the protection and enhancement of biodiversity by minimising risks to habitat condition, fragmentation and loss as a result of development. The Local Plan should seek to provide net gains in biodiversity, retain and enhance priority habitats, support biodiversity opportunity areas (BOAs), contribute to resilient ecological networks as well as supporting and aiding delivery of Nature Recovery Strategies. The Local Plan should also seek to protect, enhance and provide a coherent green/blue infrastructure network and connectivity. A Habitat Regulations Assessment (HRA) will need to be undertaken.</p> <p>The SA should include objectives that addresses protection and enhancement of biodiversity, habitats, green/blue infrastructure and consideration of ecosystem services and ecological networks as well as biodiversity net gains. The SA should carefully consider the location of potential allocations and consider other policy effects which could impact upon biodiversity and the green/blue infrastructure network.</p>
<p>Summary of the Local Plan’s (LP) relationship to Population & Human Health</p> <p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions to prioritise health & well-being, through encouraging and/or creating opportunities for physical exercise for all abilities, creating healthier choices, provision of affordable housing and housing for different groups of the population and by providing a good quality built environment and well-designed communities which are safe and accessible by walking, cycling and public transport.</p> <p>The SA framework should include objectives addressing the need to protect human health and promote well-being. The potential effects of the Local Plan on health may include opportunities for access to better health care services, access to good quality affordable housing and housing for specific groups, opportunities for physical/mental well-being through exercise and/or informal/formal recreation opportunities, food production/consumption choices as well as safe and connected communities accessible by active travel such as walking/cycling.</p>
<p>Summary of the Local Plan’s (LP) relationship to Land & Soil</p> <p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions which prioritise the development of brownfield land, makes the best use of land, promotes mixed use development, protects the most valuable agricultural land and seeks opportunities for remediating/mitigating despoiled, degraded, derelict, contaminated and unstable land. The Local plan could also include policies/actions for healthy food production and protection/enhancement of green/blue infrastructure.</p> <p>The SA framework should include objectives addressing the protection of soil and land.</p>

Summary of the Local Plan’s (LP) relationship to Water

The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions relating to sustainable use of water/water efficiency as well as protecting and aiding opportunities to improve water quality. The Local Plan should also seek to minimise the risks from and to development by avoiding inappropriate development in areas of flood risk as well as pursue sustainable drainage and minimise run-off. Protection and enhancement of blue infrastructure assets/connections should also be included including flood protection measures where possible.

The SA should include objectives that promote the protection and enhancement of the water environment & blue infrastructure including reducing flood risk from all sources, water quality and efficiency.

Summary of the Local Plan’s (LP) relationship to Air & Noise

The Local Plan review should, as far as it is able to do so, retain, strengthen and/or implement policies/actions to maintain and/or improve air quality through minimising travel demand, promoting active/sustainable forms of travel, delivery of EV charging points and/or other innovations in development. The Local Plan should seek opportunities to improve connectivity between places so that the number of journeys by car can be reduced to ease congestion, improve noise levels and improve local air quality. The location of development including any allocations should carefully consider issues of noise nuisance both to and from development.

The SA should include objectives relating to noise and air emissions.

Summary of the Local Plan’s (LP) relationship to Climate

The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions aimed at mitigating and adapting to climate change impacts through promotion of energy efficiency, encouraging renewable/low carbon energy and reducing carbon emissions. Local Plan policies/actions should also encompass the location of development to maximise opportunities for active/sustainable travel and reduce the need to travel as well as consider the need to minimise the risks from and to development by avoiding inappropriate development in areas of flood risk as well as pursue sustainable drainage and minimise run-off.

The SA should include objectives assessing the need to mitigate and adapt to climate impacts including reducing carbon emissions from domestic/commercial development, water efficiency, minimising the need to travel, promoting active/sustainable travel, addressing flood risk and drainage, opportunities for renewable/low carbon energy as well as protection/enhancement of green/blue infrastructure.

Summary of the Local Plan’s (LP) relationship to Material Assets

The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies to prioritise the reduction in primary aggregates use in development and supporting infrastructure through the reuse/recycling of construction/demolition wastes. The Local Plan should also provide for affordable housing and housing for different groups of the population and the infrastructure to support development across the Borough.

The SA should include objectives assessing the need to promote the reuse/recycling of construction wastes as well as provision of affordable and other types of housing and infrastructure delivery.

Summary of the Local Plan's (LP) relationship to Cultural Heritage

The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions to minimise the risks to the historic environment by proactively planning for its protection/enhancement and enjoyment. The Local Plan should also include policies/actions to protect/enhance cultural assets and opportunities to improve access to cultural facilities/services.

The SA framework should include objectives that relate to heritage and the protection/enhancement of cultural facilities and services and opportunities to improve access to these.

Summary of the Local Plan's (LP) relationship to Landscape/Townscape

The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions to enhance the built environment and protect/enhance the Borough's landscapes through high quality design. The Local Plan should seek opportunities to create better connections between communities and access to services by active/sustainable travel and plan for the regeneration of areas/centres and the public realm. Policies/actions should also seek to protect/enhance and provide new opportunities for green/blue infrastructure assets and connections.

The SA should include objectives which assess the need to protect/enhance the Borough's townscapes and landscapes, opportunities for improving connectivity by active/sustainable travel and opportunities to protect/enhance/provide green/blue infrastructure.

Summary of the Local Plan's (LP) relationship to Economy & Employment

The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions which promote economic growth and development including for specific sectors and SME's as appropriate. The Local Plan should seek to improve the quality and offer of the towns through regeneration and ensure delivery of jobs through employment development, protect the Borough's most important/strategic areas of employment and promote tourism. The Local Plan should also ensure development is supported by the infrastructure needed to support economic development.

The SA should include objectives which assess the impact (both positively and negatively) on economic activity, regeneration of the towns and tourism.

Summary of the Local Plan's (LP) relationship to Transport

The Local Plan review, as far as it is able to do so, should retain, strengthen and/or include policies/actions which reduce the need to travel by car, seek opportunities to improve access to and connectivity with services/facilities/employment by active/sustainable modes of travel and transport hubs. The Local Plan should also include policies/actions which seeks delivery of transport infrastructure, EV charging points and other innovative technologies where appropriate.

The SA should include objectives which assess reducing the need to travel by car, opportunities for improving access to and connectivity by active/sustainable travel to services/facilities/employment and opportunities for transport infrastructure and EV charging and maintaining/improving air quality and reducing carbon emissions.

Summary of the Local Plan's (LP) relationship to Waste

The Local Plan, as far as it is able to do so, should retain, strengthen and/or include policies which seek to reduce further the amount of waste generated and to increase the use of recycled or recovered materials in the maintenance or construction of urban developments and supporting infrastructure. The Local Plan should also include policies which seeks to ensure space within development for waste storage.

The SA should include objectives which assess the need to reduce resources and emphasise waste prevention/re-use/recycling in construction/demolition.

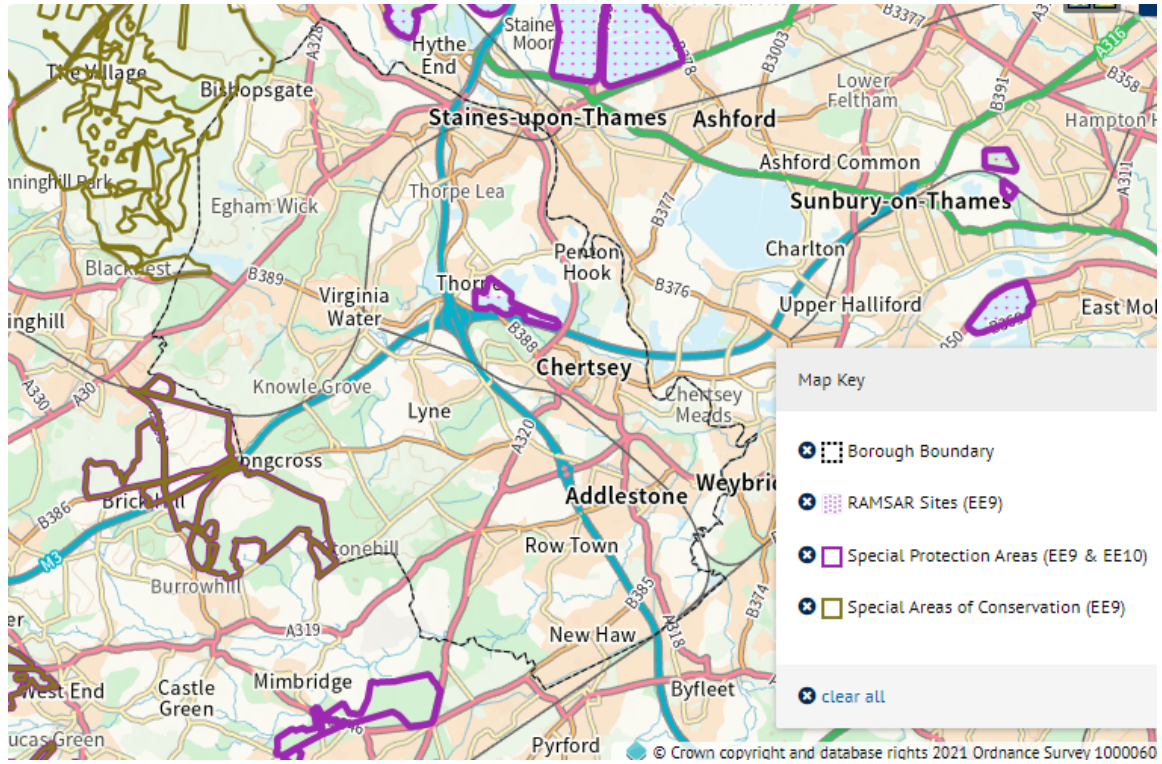
- 2.5 In order to be able to predict and monitor the effects of the 2040 Local Plan it is necessary to have an understanding of the current position or baseline position.
- 2.6 The baseline position has been set out in a series of thematic areas (including the receiving environments as contained within Annex I(f) of the SEA Directive and Social/Economic criteria). This is set out within the following sections which also includes the likely future conditions in the absence of the 2040 Local Plan.

3. Baseline Information - Biodiversity (including Flora & Fauna) & Green/Blue Infrastructure

- 3.1 The Borough of Runnymede contains numerous sites designated for their nature conservation value at either a local, national or international level. At a national level the Borough contains five Sites of Special Scientific Interest (SSSI), some of which are also internationally designated as Ramsar, Special Protection Area (SPA) and/or Special Area of Conservation (SAC). At a local level the Borough contains Sites of Nature Conservation Importance (SNCI) and Local Nature Reserves. The full list of designated sites of nature conservation importance in the Borough and those that cross Borough boundaries can be found in Table B1 in Appendix B.
- 3.2 The Thorpe no 1 Gravel Pit is designated as a SSSI and is one of a number of SSSI units which forms the wider South West London Waterbodies SPA and Ramsar site. The South West London Waterbodies were designated as SPA/Ramsar for its importance as a site of resident and migratory populations of European important bird populations of Gadwall (*Anas strepera*) and Shoveler (*Anas clypeata*).
- 3.3 Windsor Forest & Great Park is designated as SSSI as well as a SAC, part of which lies within the Borough of Runnymede. The site was designated as a SAC as it is considered to support a significant presence of Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robur* or *Ilex-Fagenion*). As well as Old acidophilous oak woods with *Quercus robur* on sandy plains the site also hosts a small population of violet click beetles (*Limoniscus violaceus*).
- 3.4 The Thames Basin Heaths SPA (including the Thursley, Ash, Pirbright & Chobham SAC) has been designated for dry and wet heathland, mire, oak, birch, acid woodland, gorse scrub and acid grassland. In addition, it supports three breeding populations of lowland heathland bird species, Nightjar (*Caprimulgus europaeus*), Woodlark (*Lullula arborea*), and Dartford Warbler (*Sylvia undata*). Whilst not within the Borough of Runnymede one unit of the SPA and the SAC lies on the Borough boundary at Chobham Common.
- 3.5 Advice from Natural England is that development for net additional dwellings within 5km of the Thames Basin Heaths SPA is likely to lead to increased recreational pressure arising from increased population. This may also be the case for large developments of 50 or more units within 7km of the SPA. The increase in recreational pressure is likely to lead to significant effects on the SPA and as such development should not be permitted without any form of avoidance measures. Further, Natural England considers that there are no avoidance measures capable of accommodating net additional dwellings within 400m of the SPA due to urbanising impacts although other forms of development can be permitted.
- 3.6 In order to accommodate residential development within a 5km zone (7km for large developments) around the SPA (but outside 400m) Natural England working with local authorities affected by the SPA published The Thames Basin Heaths Delivery Framework. The Framework sets out the mechanism to avoid adverse impact to the SPA. This includes the provision of Suitable Alternative Natural Greenspace (SANG) to act as land for general recreation to divert people away from the SPA. Additionally to SANG, a Strategic Access Management & Monitoring (SAMM) project has been introduced which puts into place SPA wide monitoring and management.
- 3.7 Other SSSI within the Borough not forming part of either a Ramsar, SPA or SAC include part of the Basingstoke Canal, Langham Pond and Thorpe Hay Meadow. Figure 3-1 shows the location of Ramsar, SPA, SAC & SSSI and Figure 3-2 the

location of SNCI & LNR sites within the Borough. Table 3-1 shows the current condition of Ramsar/SPA/SAC and SSSI units against their condition in 2012/14 and whether this meets PSA targets⁵.

Figure 3-1: Location of Ramsar, SPA and SAC



⁵ PSA target is for 95% of SSSI unit to be in favourable or unfavourable recovering condition.

Table 3-1: Condition Status of Ramsar, SPA, SAC and SSSI

Indicator/Theme	Site	Status 2012/14 ⁶	Status (current)	Trend	Comments
South West London Waterbodies SPA & Ramsar (828.14ha)					
Condition status of SSSI PSA target of 95% of SSSI unit to be in 'Favourable' or 'Unfavourable Recovering' status	Kempton Park Reservoirs SSSI	<i>Unfavourable Recovering 100%</i>	<i>Unfavourable Recovering 100%</i>	?	The last surveys for Kempton Park and Knight & Beesborough SSSIs were undertaken in 2012. As such current condition status is based on 2012 data, the same as presented in the SA Scoping Report 2014. Whilst the two SSSI meet the PSA target the trend is uncertain given time elapsed since last survey although Knight & Beesborough SSSI has been in a favourable condition since 1999. The site check notes from 2012 for Kempton Park Reservoirs also states that a project is underway to clear and treat Crassula which should improve conditions. Although a small area of Staines Moor is now unfavourable declining the PSA target is still met and a higher percentage of the SSSI is now in a favourable condition rather than unfavourable recovering. As such the trend is improving. The SSSIs at Wraysbury & Hythe End Gravel Pits and Wraysbury no.1 Gravel Pit have also moved from unfavourable recovering to favourable, an improving trend whilst Thorpe no.1 Gravel Pit located in Runnymede has remained favourable since 1999.
	Knight & Beesborough Reservoirs SSSI	<i>Favourable 100%</i>	<i>Favourable 100%</i>	?	
	Staines Moor SSSI	<i>Favourable 67% Unfavourable Recovering 33%</i>	<i>Favourable 96.16% Unfavourable Recovering 2.13% Unfavourable Declining 1.71%</i>	✓	
	Thorpe no.1 Gravel Pit SSSI	<i>Favourable 100%</i>	<i>Favourable 100%</i>	-	
	Wraysbury & Hythe End Gravel Pits SSSI	<i>Unfavourable Recovering 100%</i>	<i>Favourable 100%</i>	✓	
	Wraysbury no.1 Gravel Pit SSSI	<i>Unfavourable Recovering 100%</i>	<i>Favourable 100%</i>	✓	
	Wraysbury Reservoir SSSI	<i>Favourable 100%</i>	<i>Favourable 100%</i>	✓	

⁶ Taken from Runnymede SA Scoping Report 2014 and/or Natural England

Thames Bason Heaths SPA⁷ including Thursley, Ash, Pirbright & Chobham SAC (8,274.72ha)					
Condition status of SSSI PSA target of 95% of SSSI unit to be in 'Favourable' or 'Unfavourable Recovering' status	Broadmoor to Bagshot Woods & Heaths SSSI	<i>Favourable 65.61%</i> <i>Unfavourable</i> <i>Recovering 34.39%</i>	<i>Favourable 75.63%</i> <i>Unfavourable</i> <i>Recovering 23.83%</i> <i>Unfavourable No Change 0.55%</i>	✓	The Broadmoor to Bagshot Woods & Heaths and Colony Bog & Bagshot Heaths SSSIs show general improvement. Although a small percentage of one SSSI is unfavourable no change and the other unfavourable declining, a higher percentage of the sites are now in a favourable condition. Both sites meet the PSA target and the trend is improving. Chobham Common has seen an improving condition with a higher percentage as favourable and unfavourable no change, no longer recorded. However, many of the site condition surveys were carried out prior to a heathland fire in 2020 and as such the trend is uncertain until the effects of the fire are surveyed. Both the Horsell Common and Ockham & Wisley SSSIs meet the PSA target, with both SSSIs seeing improvement since 2014 with a higher proportion on both sites in a favourable condition. As such the trend is improving for both of these sites.
	Chobham Common SSSI	<i>Favourable 2.15%</i> <i>Unfavourable</i> <i>Recovering 92.29%</i> <i>Unfavourable No Change 5.56%</i>	<i>Favourable 43.05%</i> <i>Unfavourable</i> <i>Recovering 56.95%</i>	?	
	Colony Bog & Bagshot Heath SSSI	<i>Favourable 8.59%</i> <i>Unfavourable</i> <i>Recovering 90.74%</i> <i>Unfavourable Declining 0.67%</i>	<i>Favourable 94.94%</i> <i>Unfavourable</i> <i>Recovering 4.39%</i> <i>Unfavourable Declining 0.67%</i>	✓	
	Horsell Common SSSI	<i>Favourable 16.61%</i> <i>Unfavourable</i> <i>Recovering 60.89%</i> <i>Unfavourable No Change 22.5%</i>	<i>Favourable 21.53%</i> <i>Unfavourable</i> <i>Recovering 78.47%</i>	✓	
	Ockham & Wisley Commons SSSI	<i>Favourable 33.19%</i> <i>Unfavourable</i> <i>Recovering 66.81%</i>	<i>Favourable 54.01%</i> <i>Unfavourable</i> <i>Recovering 45.99%</i>	✓	
Windsor Forest & Great Park SAC (1,687.26ha)					
Condition status of SSSI PSA target of 95% of SSSI unit to be in 'Favourable' or 'Unfavourable Recovering' status	Windsor Forest & Great Park SSSI	<i>Favourable 46.45%</i> <i>Unfavourable</i> <i>Recovering 53.55%</i>	<i>Favourable 100%</i>	✓	The SSSI meets the PSA target and has seen an improvement where 100% of the SSSI is now in a favourable condition. The trend is therefore improvement including units 10 & 11 in Runnymede which had been unfavourable recovering or unfavourable no change since 2001.

⁷ SSSI sites within 7km of Runnymede

Basingstoke Canal SSSI (23ha)					
Condition status of SSSI	Basingstoke Canal SSSI	<i>Favourable 16.63%</i> <i>Unfavourable</i> <i>Recovering 10.40%</i> <i>Unfavourable No Change 45.39%</i> <i>Unfavourable Declining 27.58%</i>	<i>Favourable 16.63%</i> <i>Unfavourable</i> <i>Recovering 10.40%</i> <i>Unfavourable No Change 45.39%</i> <i>Unfavourable Declining 27.58%</i>	-	The SSSI does not meet the PSA target. Only 2 units have been surveyed since 2014, units 7 & 10, however their condition status has not changed between surveys. Unit 2 in Runnymede is in an unfavourable no change condition.
PSA target of 95% of SSSI unit to be in 'Favourable' or 'Unfavourable Recovering' status					
Langham Pond SSSI (25.9ha)					
Condition status of SSSI	Langham Pond SSSI	<i>Favourable 63.21%</i> <i>Unfavourable</i> <i>Recovering 36.79%</i>	<i>Favourable 100%</i>	✓	Site meets PSA target and has now improved to 100% favourable. As such the trend is improving.
PSA target of 95% of SSSI unit to be in 'Favourable' or 'Unfavourable Recovering' status					
Thorpe Hay Meadow (6.62ha)					
Condition status of SSSI	Thorpe Hay Meadow SSSI	<i>Favourable 100%</i>	<i>Favourable 100%</i>	-	Site meets the PSA target and continues to be 100% favourable and therefore there is no change.
PSA target of 95% of SSSI unit to be in 'Favourable' or 'Unfavourable Recovering' status					

Other Habitats and Species in Runnymede

- 3.8 There are 38 SNClS in the Borough designated at a local level. The last surveys/reviews of SNClS were undertaken in 2003 and the Council does not hold data for the condition status of these sites. Therefore, given the length of time since last survey/review and absence of information there is uncertainty as to whether the trend in condition status of SNClS sites are improving or deteriorating.
- 3.9 Whilst designated sites are important, other habitats and species which are not designated are also valued such as priority habitats, ancient woodland and biodiversity opportunity areas. The Borough contains approximately 201 hectares of ancient semi natural woodland and approximately 111 hectares of replanted woodland or ancient woodland. Surrey is the most wooded county in Great Britain with 22% of woodland, compared to a UK average of 12.6% and England average of 10.5%⁸.
- 3.10 Priority habitat in Runnymede includes:
- Deciduous woodland, wood pasture & parklands - located across the Borough;
- Good quality semi-improved grassland - located at Runnymede Meadows;
- Lowland meadows – located at Chertsey Meads, Thorpe Hay Meadow, Runnymede Meadows;
- Traditional orchard – located at
- Addlestone – St Augustines Care Home, Otterhill Nursery, Three Gates & Southern Wood, Row Town;
 - Chertsey – Abbey Chase, Chertsey Meads, Weir Manor Bridge Road and Sandgates;
 - Egham - The Runnymede Hotel;
 - Englefield Green - The Orchard, Round Oak, Dell Park Farm, Park Place Estate, Priest Hill House and Tranquility Keep in Englefield Green,
 - Lyne - Fan Court Farm;
 - Ottershaw - The Wey Farm;
 - Virginia Water - St Ann's Park
 - Woodham – The Chase
- 3.11 The State of Surrey's Nature report⁹ identifies that Surrey's woodlands have increased since the end of the 19th century, however, declines in quality due to woodland management change and neglect are evident. Historic features such as parklands tend to be relatively secure however. The report identifies new drivers encouraging a

⁸ Davies, R, Benstead-Hume, V., Grose, M., Sansum, P., McKernan, P., & Westaway, S. & (2012). A revision of the Ancient Woodland Inventory for Surrey. Available at: <https://www.runnymede.gov.uk/downloads/file/1007/aw-inventory-surrey>

⁹ State of Nature (2017) Surrey Nature Partnership. Available at: <https://surreynaturepartnership.org.uk/our-work/>

renaissance in woodland management including markets for home grown timber including use as fuel for sustainable energy.

- 3.12 The Surrey Nature Partnership has also identified Biodiversity Opportunity Areas (BOAs) in Surrey¹⁰. Runnymede is identified as being within the Thames Valley and Thames Basin Heaths BOAs.
- 3.13 The Thames Valley BOA identifies habitats of principle importance as wood pasture & parkland, meadows, heathland, acid grassland, mixed deciduous woodland, wet woodland, hedgerows, fen, ponds, standing open water, floodplain grazing marsh and reedbeds. Priority species for recovery include Oak Polypore, Tooth Fungi, Greater Water-Parsnip, Marsh Stitchwort, Lesser Spotted Woodpecker, Skylark, Lapwing, Water Vole and Hedgehog.
- 3.14 The Thames Basin Heaths BOA identifies habitats of principle importance as heathland, acid grassland, mixed deciduous woodland, wet woodland, standing open water and fen. Priority species for recovery includes Deptford Pink, Marsh Clubmoss, Three-Lobed Crowfoot, Window Winged Sedge, Shoulder-Striped Clover Moth, Blue Pepper-Pot Beetle, Nightjar, Woodlark, Smooth Snake and Sand Lizard.
- 3.15 The majority of these species are currently identified as rare or very rare with some species declining and water vole identified as extinct in Surrey, although Nightjar is identified as increasing and Woodlark recovering⁹. Table B2 in Appendix B sets out the status of species found in the Thames Valley and Thames Basin Heaths BOAs within Runnymede. Other Important species in Runnymede include Curlew, Redshank, Tree Sparrow, and Turtle Dove.

Future Baseline

- 3.16 Future conditions in the absence of the plan are likely to be positive as management regimes continue to be implemented which should maintain favourable status meeting PSA targets for SSSI units. Part of the damage caused at Staines Moor was due to illegal use by third parties driving vehicles and if this has ceased since last survey in 2017 then there may have been improvements in the condition of the SSSI unit and moving into the future. The fire at Chobham Common may see a deterioration in condition status in the short term, but the heathland should regenerate over time subject to other external pressures such as recreation/urbanisation/air quality.
- 3.17 The area of sites covered by international, national and local designations is not expected to change significantly in the future given protection under UK legislation and existing Local Plan Policies. National policy objectives to achieve sustainable water abstraction, improve water quality and existing Local Plan policies to deliver SuDS and drainage strategies should also aid protecting wetland habitats and maintain their favourable status.
- 3.18 The condition status of the Basingstoke Canal does not meet PSA targets although last survey date for unit 2 was in 2009. Reasons for its unfavourable condition are due to extent of habitat, lack of plant diversity and poor water quality. Given the time elapsed since last survey it is uncertain whether there have been any improvements over time. The latest information on water quality from Defra¹¹ in 2021 shows the ecological status of the canal as moderate, with chemical quality now a fail with presence of Polybrominated diphenyl ethers (PBDE)¹² a fail. The reasons for waters not meeting

¹⁰ Biodiversity Opportunity Areas available to view at <https://surreynaturepartnership.org.uk/our-work/>

¹¹ Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB70610019?cycle=2>

¹² PBDE are man-made compounds which have been used as flame retardants in a wide range of products including electrical and electronic equipment, textiles and foams.

good status are due to physical modifications through recreation. As such, the reasons for chemical and overall status are largely beyond the scope of the Local Plan to address.

- 3.19 The Basingstoke Canal Authority have also prepared a Conservation Management Plan 2018-2028¹³ to address the unfavourable status of the SSSI. The Plan contains targets for water level management, water quality, tree management, dredging and vegetation control. In the absence of the plan, the condition status of the canal remains uncertain, although as set out above national objectives for the water environment and more widespread use of SuDS in development as well as the targets set out in the Canal Management Plan should aid in improving or maintaining water quality and ecological status over time.
- 3.20 Further positive trends for biodiversity may be seen with the introduction of the Environment Act and the statutory requirement to achieve 10% biodiversity net gain on most development sites. This should aid in improving biodiversity across the Borough, where on-site or off-site gains can be delivered. Off-site gains could be used to aid in achieving Biodiversity Opportunity Area (BOA) objectives for habitats and species recovery, although this could be dependent on Nature Recovery Strategies or other priorities. Even in the absence of the plan, the Council has the ability to secure net gain through use of planning conditions or securing financial contributions through CIL or S106. BOA projects for the Thames Valley BOA include the River Thames Flood alleviation scheme and for the Thames Basin Heaths BOA, implementation of SANG at Longcross, significant potential for heathland and acid grassland creation and priority habitat restoration at Queenwood Golf Course/Stanners Hill.
- 3.21 Whilst the future baseline is generally considered to be positive, in the absence of the plan, the impact of climate change adds some uncertainty. In the South East of England plant and animal species will have to adapt to hotter, drier summers and warmer wetter winters. Changes in temperature and rainfall patterns may be beneficial to some species but adverse for others and lead to changes in distribution patterns or even extinctions. It is therefore important that policies which protect and enhance biodiversity and which aim to aid climate change mitigation and adaptation are retained and/or strengthened. This could include going beyond the standard 10% BNG set out in the Environment Act, referencing Local Nature Recovery strategies and/or BOA projects for delivery as well as protection/enhancement of priority habitat and strengthening the green/blue infrastructure network.
- 3.22 Whilst the SSSI units for the Thames Basin Heaths SPA including the Thursley, Ash, Pirbright & Chobham SAC show an improving trend, the issue of an increasing population is likely to continue to place pressure on these sites. Therefore, the need to protect internationally designated sites and the securing of mitigation measures is an issue likely to continue into the future in the absence of the plan. The Local Plan will therefore need to ensure that sufficient and appropriate mitigation measures are planned for and brought forward to address this.
- 3.23 Based on the above, Table 3-2 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes. The impacts to internationally designated sites (SPA, SAC & Ramsar) resulting from the 2040 Local Plan will also need to be considered through a Habitats Regulations Assessment (HRA). This will be set out within a separate document.

¹³ Basingstoke Canal Conservation Management Plan 2018-2028 (2018) Basingstoke Canal Authority. Available at: <https://www.hants.gov.uk/thingstodo/countryparks/basingstokecanal/canalauthority>

Table 3-2: Issues/Problems for Biodiversity & Green/Blue Infrastructure

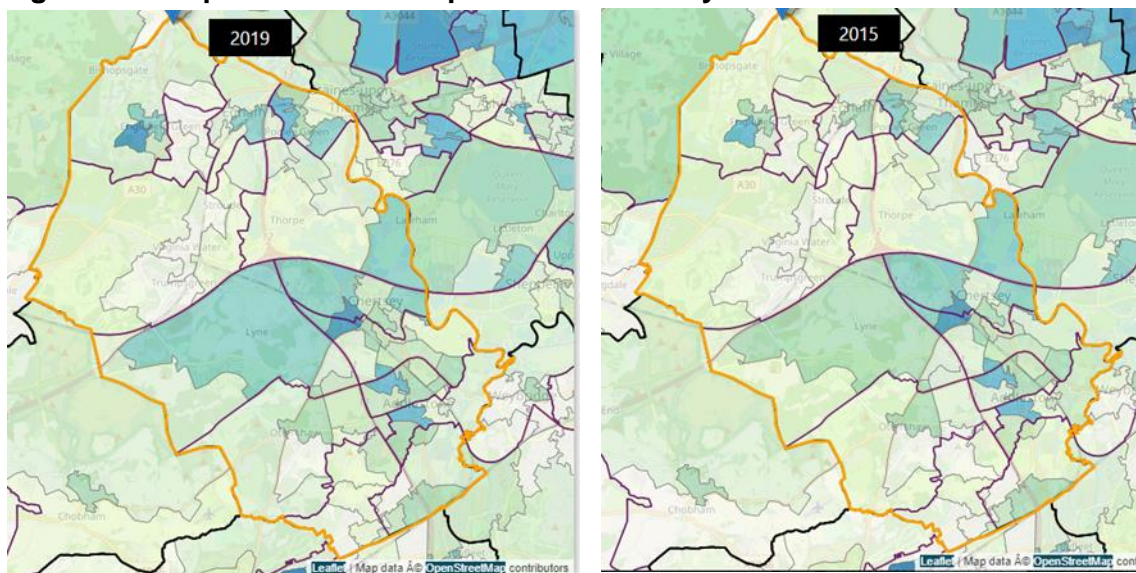
Issue/Problem	Source	How Local Plan can Address Issue	Relationship to Other PPPs
Climate change impacts could place pressure on habitat and species protection/recovery.	Other PPPs Baseline Information	The 2040 Local Plan should seek to include, retain and/or strengthen existing climate change mitigation & adaptation measures	NPPF - Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for...biodiversity...
Protection & enhancement of designated sites and green & blue infrastructure network.	Other PPPs Baseline information	The 2040 Local plan will need to include, retain and/or strengthen policies for the protection, enhancement of designated sites (international, national & local), priority habitats and the green & blue infrastructure network.	A Green Future - Environmental protections enshrined in national planning policy will be maintained and strengthened. Biodiversity 2020 - support healthy well-functioning ecosystems and establish coherent ecological networks. NPPF - distinguish between the hierarchy of international, national and locally designated sites...take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure
Securing Biodiversity Net Gain (BNG) through on or off site enhancements	Other PPPs	The 2040 Local Plan should seek to secure at least 10% BNG. Policies could link or reference BNG and/or blue/green projects to align with other strategies/priorities and focus funding/delivery.	A Green Future - Making sure that existing requirements for net gain for biodiversity in national planning policy are strengthened. NPPF - identify and pursue opportunities for securing measurable net gains for biodiversity. Environment Act requires 10% BNG from 2023. Surrey 2050 Place Ambition - pursuing opportunities for improving biodiversity alongside new development.
Increased recreational pressure on Thames Basin	Baseline Information	No net additional dwellings should be permitted within 400m of the SPA/SAC and net	Thames Basin Heaths Delivery Framework – restricts development within 400m of SPA and

<p>Heaths SPA/Thursley, Ash, Pirbright & Chobham SAC leading to deterioration and/or fragmentation of habitat including SSSI units.</p>		<p>residential within 400m-5km and in some circumstances between 5km-7km will require mitigation to address recreational impacts. The 2040 Local Plan will need to retain/strengthen policies for protection of the SPA/SAC and delivery of SANG/SAMM. The Local Plan should also identify the delivery of sufficient SANG in the short/medium term and to the end of the plan period where possible.</p>	<p>gives solution for mitigation within 400m-7km through SANG and identifies SAMM project.</p> <p>Surrey 2050 Place Ambition - Providing SANG to mitigate the impacts of new housing development on the SPAs which also delivers new accessible and good quality green infrastructure.</p>
<p>Basingstoke Canal SSSI not meeting PSA targets</p>	<p>Baseline Information</p>	<p>Improving the condition status of the SSSI is largely outside the scope of the Local Plan. However including, retaining and/or strengthening policies for water efficiency, SuDS and drainage strategies should aid condition status.</p>	<p>A Green Future - Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term.</p>

4. Baseline Information - Population & Human Health

- 4.1 The baseline population of the Borough as at 2020 currently stands at around 90,449¹⁴ people split as 49% males and 51% females. This is an increase of 9,939 people from the 2011 census data (10%). The ethnic mix of residents is predominantly white at 89% with the Black and Minority Ethnic (BME) groups at 11%, the largest group of which is Asian or British Asian at 3%. This is a higher BME population than Surrey by 1.4% but lower than England at 14%¹⁵.
- 4.2 The majority of the population are aged between 25 and 64 (51%) which is the same as the 2011 census indicating that the working age population is stable. Runnymede has a higher percentage of people aged under 30 (40%) than Surrey (35%) which is an increase of 3% since the 2011 Census. The population of those aged 65 and over is 17% which is slightly lower than Surrey at 19%. The population of those aged 85+ is 3% the same as Surrey and an increase of 0.5% from the 2011 Census.
- 4.3 The Borough has a population density of 10.3 people per hectare compared to 6.3 in Surrey and 4.1 in England.
- 4.4 The indices of deprivation show how deprived neighbourhoods are with a ranking of 1 being the most deprived. In 2019 Runnymede ranked 256 out of 317 local authority areas which is a worsening situation since 2015 where Runnymede was ranked 272 out of 317 authorities. Although Runnymede shows low levels of deprivation overall in comparison with the rest of England there are pockets of relative deprivation. The Pooley Green area of Egham, Pyrcroft Road area of Chertsey and Green Road and Addlestone Park area of Addlestone are amongst the 40% most deprived areas of England with the Ashwood Road/Beechtree Avenue in Englefield Green within the most 30% deprived areas of England. Maps of Runnymede showing Indices of Deprivation in 2019 and 2015 are shown in Figure 4-1. Blue areas denote higher deprivation levels relative to other areas.

Figure 4-1: Map of Indices of Deprivation for Runnymede¹⁶



¹⁴ Surrey-I population estimates. Available at: <https://www.surreyi.gov.uk/dataset/em0ym/population-estimates>

¹⁵ Census 2011

¹⁶ Available at: <https://www.gov.uk/guidance/english-indices-of-deprivation-2019-mapping-resources#indices-of-deprivation-2019-local-authority-dashboard>

- 4.5 The indices are made up of a number of deprivation typologies and Runnymede scores well for income (272), employment (293), health & disability (263) and education (240), it does not score so well against crime (154), living environment (136) and barriers to housing & services (40).
- 4.6 Local health profiles for Runnymede show that average life expectancy from birth for males is 80.8 years and females 84.4 years, which is higher than the south east (80.6 years) and England (79.4 years) for males and south east (84.1) and England (83.1) for females. The health profiles also show that mortality for under 75s from all causes is lower than the south east and England. However, whilst lower than England, mortality in under 75s from cancer is higher than the south east.
- 4.7 At the last Census (2011), 3.7% of residents reported their health as poor or very poor with 13.9% reporting a long term illness or disability. In 2013 22.6% of adults in Runnymede report they take part in sport and active recreation for the equivalent of 30 minutes three times a week. This increased to 26% in 2016¹⁷ and is slightly higher than the England average at 23.5%.
- 4.8 In 2012/13, 19% of children aged 4-5 and 30% of those aged 10-11 were reported as overweight or obese¹⁶ in Runnymede. This is slightly lower than the England average of 22% and 33% respectively. However, the trend over time has improved only slightly to 17% of children aged 4-5 and 28% of 10-11 year olds in 2018/19, although this is still lower than England at 22.5% and 34% in 2018/19 respectively. The number of fast food outlets in Runnymede is around 70.6 per 100,000 population. This is higher than the Surrey average at 64.6% and neighbouring areas such as Spelthorne (60.7) and Elmbridge (63.9), but lower than neighbouring authority areas such as Woking (86.8), Surrey Heath (78.9) and Royal Borough of Windsor & Maidenhead (73.5).
- 4.9 The conception rate for under 18's in Runnymede has steadily declined in Runnymede from a peak of 35 out every 1,000 15-17 year old females in 2010 to 6.6 per 1,000 15-17 year old females in 2019¹⁶. This is lower than the England average at 15.7 per 1,000 15-17 year old females in 2019.
- 4.10 In terms of housing, as at 1st August 2021 there were 1,154 households on the housing register. The availability of affordable housing to meet local needs is a key issue in Runnymede, an area which demonstrates high house prices which as at December 2021 averaged £459,229¹⁸ and increase of over £30,000 from December 2020.
- 4.11 One indicator of affordability is the comparison of property price to earnings ratio (affordability ratio). In 2012 the affordability ratio was 7.3 which has steadily increased to 9.9 in 2020¹⁹, a worsening trend of affordability. In fact, the average price for first time buyers in Runnymede has risen from £336,831 in December 2020 to £360,595 in December 2021¹⁹.
- 4.12 In 2018/19 there were a total of 12,476 crimes were recorded, most notably 31 cases of robbery, 316 cases of domestic burglary, 594 cases of violence with injury and 786 of criminal damage. In 2020/21 a total of 13,038 crimes were reported, an increase of around 5% from 2018/19. Whilst the incidences of robbery increased to 44 cases, domestic burglary decreased to 279, violence with injury fell to 539 and criminal damage fell to 773.

¹⁷ Data derived from <https://lginform.local.gov.uk/reports/view/lga-research/lga-research-report-health-and-wellbeing-in-your-area?mod-area=E07000212>

¹⁸ Sourced from <https://landregistry.data.gov.uk/>

¹⁹ Sourced from <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2020>

- 4.13 Table 4-1 sets out the summary of population and health trends over time for Runnymede against comparator areas of either Surrey, the South East or England.

Table 4-1: Summary of Population & Health Trends

Theme	Previous Status	Current Status	Trend
Total Population	80,510	90,449	↑ 10%
Population >30	37%	40%	↑ 3%
Population 25-64	51%	51%	=
Population 85+	2.5%	3%	↑ 0.5%
Indices of Deprivation	272 out of 317	256 out of 317	↓ 16
Life Expectancy		80.8 (M) 84.4 (F)	N/A
Adult Activity	22.6%	26%	↑ 3.4%
Childhood Obesity	19% 4-5 year olds 30% 10-11 year olds	17% 4-5 year olds 28% 10-11 year olds	↓ 2% ↓ 2%
Under 18 Conception Rate	35 per 1,000 15-17 year olds	6.6 per 1,000 15-17 year olds	↓ 28.4
Affordability Ratio	7.3	9.9	↑ 2.6
Recorded Crime	12,476	13,038	↑ 562

Future Baseline

- 4.14 Current trends show increasing levels of deprivation, with IMD rank falling from 272 in 2015 to 256 in 2019 out of a total of 317. However, this has to be considered in the context that the 2019 score still indicates an overall low level of deprivation (a score of 1 indicates the highest level of deprivation). It is considered that Runnymede will remain an area of low deprivation but with small pockets remaining in some places. Further, the worsening of the affordability ratio and deprivation score for barriers to housing and services is likely to continue as house price inflation continues into the longer term. This indicates that the Local Plan will need to address worsening housing affordability.
- 4.15 The population of Runnymede is growing and the 2011 census showed a population of 80,500 which has increased to around 90,500 in 2020. The 2018 Strategic Housing Market Assessment (SHMA)²⁰ shows an estimated population of 98,727 by 2030 and therefore even in the absence of the plan the population is likely to continue to grow into the future. A growing population is likely to require additional housing and infrastructure and place pressure on existing services and facilities.
- 4.16 The population profile remained relatively static with no change in those aged 25-64, however there was a trend toward a higher proportion of under 30's and slight increase in those of 85+. The general upward trend in life expectancy (aside from the effects of the Covid-19 pandemic) is likely to see an ageing population which may require bespoke services and housing needs. With an ageing population, new employment opportunities would likely need to be filled by people from outside of the Borough leading to increased in-commuting and associated issues with congestion and transport infrastructure. However, this may be offset by the higher proportion of those

²⁰ Runnymede & Spelthorne SHMA Partial Update (GL Hearn) 2018. Available at:

aged under 30, along with the rise in pensionable age, but these impacts may be over the short-medium rather than longer term.

- 4.17 The health of the population is likely to remain better than the UK average and trends show that there was an increase in the adult population who undertake sport or active recreation for 30mins, 3 times a week. The level of childhood obesity also fell slightly against the national trend where childhood obesity has risen slightly.
- 4.18 Whilst there was an increase in recorded crime, incidences of robbery, violence with injury and criminal damage fell.
- 4.19 Based on the above, Table 4-2 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 4-2: Issues/Problems for Population, Health & Well-being

Issue/Problem	Source	How Local Pan can Address Issue	Relationship to Other PPPs
Increased life expectancy increases pressure on health/housing services	Baseline Information	The Local Plan will need to consider the type/mix of housing required including for specialist needs.	<p>Surrey Joint Needs Assessment - Influence the type of housing supply (both public and private) to ensure it meets identified needs and current gaps in provision.</p> <p>Accommodation with Care & Support Strategy – focus on enabling independence and maximising individual choice and control.</p> <p>PPG Housing Needs of Different Groups Para 001 - Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies.</p>
Increase in population requiring additional housing and infrastructure/services	Baseline Information	The Local Plan will need to plan for sufficient housing to meet identified needs and the infrastructure to support this.	<p>NPPF Para 20 - Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: housing (including affordable housing).</p> <p>Planning Policy for Traveller Sites para 9 - Local planning authorities should set pitch targets for</p>

			gypsies and travellers and plot targets for travelling showpeople
Affordability ratio worsening	Baseline information	The Local Plan will need to ensure delivery of a mix of affordable housing	<p>NPPF Para 20 - Strategic policies should make sufficient provision for: housing (including affordable housing)</p> <p>Surrey Joint Strategic Needs Assessment - Identify all available opportunities to increase affordable housing supply.</p> <p>Runnymede Housing Strategy Statement - Ensure good quality affordable housing is available to local people in both the social and private sector; Increase the provision of affordable housing including low cost home ownership.</p>
Deprivation scores in some areas of the borough within the worst 30-40% nationally	Baseline information	The Local Plan should aim to ensure opportunities to access infrastructure and other services are delivered and support delivery plans/projects for improving services/facilities.	<p>NPPF Para 93 - take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.</p> <p>Community Vision for Surrey 2030 - everyone has a great start to life, people live healthy and fulfilling lives, are enabled to achieve their full potential and contribute to their community, and no one is left behind.</p>
Maintaining/improving adult activity rates and childhood obesity.	Baseline Information	The Local Plan should aim to improve opportunities for enabling active lifestyles and healthier choices.	<p>Build Back Better - increasing the focus on prevention.</p> <p>Our Green Future - Help people improve their health and wellbeing by using green spaces including through mental health services.</p>

			<p>NPPF Para 98 - Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities</p> <p>PPG Healthy & Safe Communities Para 004 - supporting opportunities for communities to access a wide range of healthier food production and consumption choices.</p> <p>Surrey Health & Wellbeing Strategy - focus on prevention, and creating healthy and proactive people who take ownership of their health. People have a healthy weight and are active</p>
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5. Baseline Information – Land & Soil

- 5.1 The surface geology in the south and west of Runnymede is formed from Bracklesham & Barton bedrock and to the north with Thames Group. Superficial deposits include River Terrace and Alluvium made up from sand, clay and gravel²¹. This has given rise to extensive mineral extractions which have been subject to restoration.
- 5.2 The agricultural land classification identifies the best and most versatile (BMV) agricultural land as classes 1, 2 or 3a. Agricultural land in Runnymede is predominantly grades 4 or 5 with a limited amount of Grades 1-3a. According to the structure of agricultural industry in England statistics²², there were 28 agricultural holdings in Runnymede in 2016 comprising 772ha of land. Most farm types found in Runnymede are classified as other (as per Defra agricultural census 2003).
- 5.3 The percentage of land within the Green Belt in Runnymede is 74%.
- 5.4 One of the aims of the Runnymede 2030 Local Plan is to make efficient use of land when developed by achieving average densities of 30 dwellings per hectare (dph). The average density of development achieved in 2020/21 was 54dph²³.
- 5.5 Runnymede Borough Council has a duty to enable the remediation of contaminated land through the planning system and to maintain a register of statutory contaminated sites. There are currently no statutory contaminated sites in Runnymede or site son the Contaminated Land Register.

Future Baseline

- 5.6 In the absence of the plan the extent of the Green Belt in Runnymede should be maintained in line with national planning policy which gives general protection aside in a few limited circumstances. However, the 2040 Local Plan will need to address the housing needs of a growing population which may place additional pressure on Green Belt.
- 5.7 In the absence of the plan the amount of land classified as best and most versatile for agriculture is also likely to be maintained given the guidance set out in the NPPF and that this land in Runnymede will also be Green Belt. However, for the same reasons as the Green Belt this could be placed under pressure with the 2040 Local Plan addressing population growth.
- 5.8 Soil quality is likely to remain relatively stable in the future and even in the absence of the plan opportunities may present themselves to remediate land if contamination is present.
- 5.9 The guidance set out in the NPPF for making efficient and effective use of land is also likely to ensure that in the absence of the plan, development continues to come forward at densities of at least 30dph. The 2040 Local Plan should ensure that this continues to minimise the pressure on the Green Belt and agricultural land from population growth and housing need.

²¹ British Geological Society maps available at: <https://www.bgs.ac.uk/map-viewers/geology-of-britain-viewer/>

²² Structure of the agricultural industry in England (Defra). Available at: <https://www.gov.uk/government/statistical-data-sets/structure-of-the-agricultural-industry-in-england-and-the-uk-at-june>

²³ Annual Monitoring Report 2020/21 (RBC). Available at: <https://www.runnymede.gov.uk/downloads/download/87/monitoring-progress-of-local-plan-policies>

5.10 Based on the above, Table 5-1 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 5-1: Issues/Problems for Land & Soils

Issue/Problem	Source	How Local Plan can Address Issue	Relationship to Other PPPs
Population growth will place pressure on Green Belt/ agricultural land.	Baseline Information Other PPPs	The 2040 Local Plan will need to carefully consider the location of additional development and ensure it continues to make the most effective and efficient use of land.	A Green Future - We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land. NPPF Para 119 - Planning policies and decisions should promote an effective use of land. NPPF Para 124 - Planning policies and decisions should support development that makes efficient use of land.

6. Baseline Information – Water

- 6.1 Watercourses and lakes are a key characteristic of the Borough, with the River Thames forming the northern and eastern boundary, and the Basingstoke Canal forming the south eastern boundary. The rivers Wey, the Addlestone Bourne and the Chertsey Bourne run through the Addlestone and Chertsey areas of the Borough. Consequently, much of the eastern side of the Borough is subject to flood risk including areas of functional floodplain.
- 6.2 The water environment can be polluted from a variety of sources including point sources, such as a sewage outlet or from diffuse sources such as rainwater run-off from roads. Untreated pollutants can have adverse effects on human health and can have adverse effects on the natural environment, not just the water environment.
- 6.3 The Water Environment Regulations seek to improve the water environment including key objectives for water bodies. The Thames River Basin District Management Plan²⁴ produced by the Environment Agency divides the Thames catchment into a number of operational catchments. The Borough of Runnymede lies within the Wey operational catchment which is further sub-divided into 42 waterbodies, as well as the Thames Lower operational catchment which is formed from 17 waterbodies.
- 6.4 Table B3 in Appendix B sets out water bodies from the Wey and Thames operational catchments which run through Runnymede and their ecological condition status over time and Table 6-1 below sets out a summary of this. Condition status is derived from the Environment Agency²⁵.

Table 6-1: Waterbodies and Condition Status Summary

Waterbody	Ecological Status		Trend	Notes
	2013	2019		
Addlestone Bourne (West End to Hale/Mill Bourne)	Moderate	Moderate	-	Reasons for not achieving good status due to sewage discharge
Hale/Mill Bourne (Bagshot to Addlestone Bourne)	Moderate	Moderate	-	Reasons for not achieving good status due to sewage discharge, land drainage from agriculture and drainage from transport
Addlestone Bourne (Mill/Hale to Chertsey Bourne)	Good	Moderate	×	Reasons for not achieving good status due to sewage discharge
Chertsey Bourne (Ascot to Virginia Water)	Moderate	Poor	×	Reasons for not achieving good status due to physical modification and natural mineralisation.
Chertsey Bourne (Sunningdale to Virginia Water)	Poor	Poor	-	Reasons for not achieving good status due to physical modification including land drainage from agriculture, barriers,

²⁴ Thames River Basin District River Basin Management Plan (Environment Agency) 2015. Available at: <https://www.gov.uk/government/publications/thames-river-basin-district-river-basin-management-plan>

²⁵ <https://environment.data.gov.uk/catchment-planning/>

				urbanisation and natural causes including drought and mineralisation.
Virginia Water Lake	Poor	Poor	-	Reasons for not achieving good status due to sewage discharge
Chertsey Bourne (Virginia Water to Chertsey)	Moderate	Moderate	-	Reasons for not achieving good status due to physical modification including barriers.
The Moat at Egham	Moderate	Poor	×	Reasons for not achieving good status due to sewage discharge, physical modification including drainage from transport, land drainage from agriculture & barriers, natural causes such as drought and surface water abstraction.
Chertsey Bourne (Chertsey to River Thames)	Moderate	Poor	×	Reasons for not achieving good status due to sewage discharge and urbanisation.
Thorpe Park Lakes	Moderate	Poor	×	Reasons for not achieving good status due to land drainage from agriculture.
Wey Navigation	Moderate	Moderate	-	Reasons for not achieving good status due to sewage discharge and physical modification.
Thames (Cookham to Egham)	Moderate	Moderate	-	Reasons for not achieving good status due to sewage discharge, surface water abstraction and physical modification.
Thames (Egham To Teddington)	Moderate	Poor	×	Reasons for not achieving good status due to sewage discharge, poor nutrient management, surface water abstraction and physical modification.

6.5 As can be seen above, recent trends in the ecological status of waterbodies within Runnymede are either in a moderate or poor status with many declining over time and none improving. A number of reasons for this include sewage discharge and drainage either from agriculture/transport or physical modifications. As such, a number of the reasons for not meeting a 'Good' status are largely beyond the scope and control of the Local Plan.

6.6 Two groundwater units also lie within Runnymede, the Chobham Bagshot Beds unit and the Lower Thames Gravels unit. The Chobham Bagshot Beds unit's overall status

is identified as good for water quantity but poor for chemical status and the Lower Thames Gravels unit's status is poor for quantity but has a good chemical status. Table B4 shows the status of both units over time and a summary is set out in Table 6-2 below.

Table 6-2: Quantity Status of Thames Groundwater Units in Runnymede

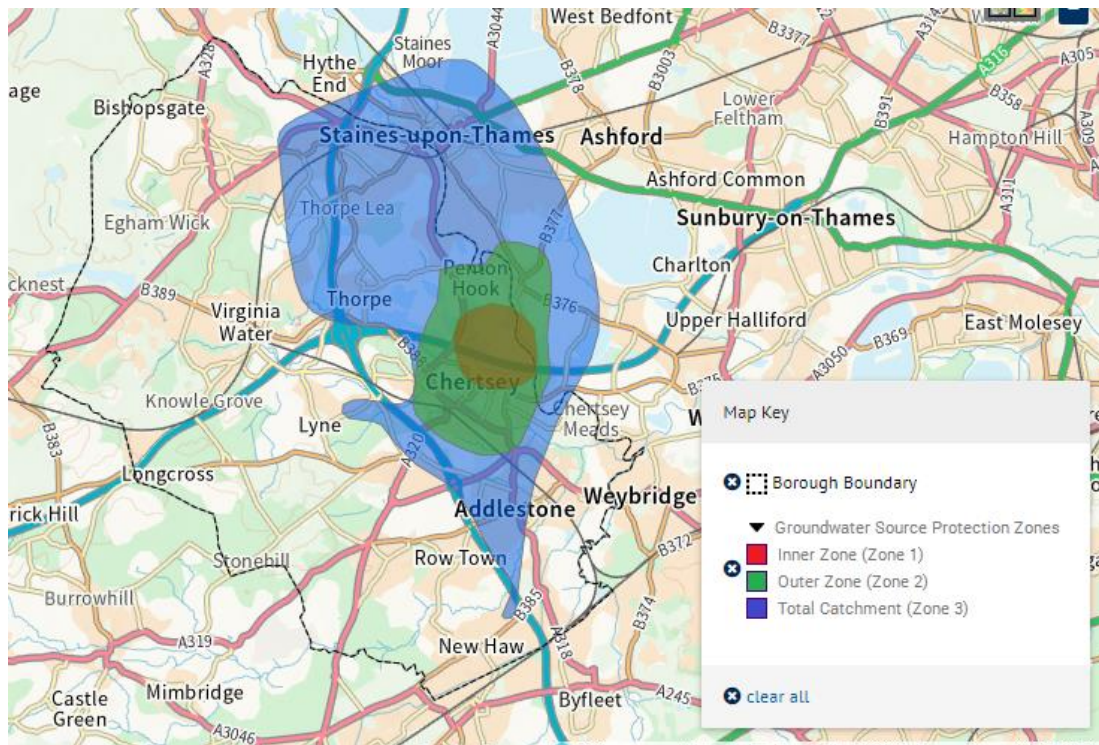
Waterbody	Quantity Status		Trend	Notes
	2013	2019		
Chobham Bagshot Beds	Good	Good	-	Good for quantitative status and quantitative balance but poor for chemical status.
Lower Thames Gravels	Good	Poor	x	Poor for quantitative status and quantitative balance but good for chemical status.

- 6.7 In terms of water resource Runnymede lies in an area of serious water stress as identified by the Environment Agency²⁶. The provider of potable water for the Borough is Affinity Water.
- 6.8 The Affinity Water Resource Management Plan (WRMP) identifies Runnymede Borough within the Central region and the Wey community. The Resource Management Plan sets out that the amount of water currently available to supply customers will not meet future demand with a shortfall in the Central region by 2080 of 256 Ml/day. Proposals to increase water supply include network infrastructure improvements to move water to where it is needed. Maximise use of existing sources of water including imports, building a new reservoir in Oxfordshire and transferring water via the Grand Union Canal. As well as these measures, actions also include reducing water demand through leakage control, reduce water use from the average of 152 litres per person per day to 129 litres and aim to further reduce this to between 110 and 120 litres per person per day by 2045 as well as installing water meters.
- 6.9 The Wey Catchment Abstraction Licensing Strategy²⁷ produced by the Environment Agency identifies that for the Weybridge Assessment Point (AP) there is restricted water available for licensing.
- 6.10 As highlighted in the section on biodiversity the Basingstoke Canal suffers from water shortages especially in the summer months and this is reflected in the amount of the SSSI meeting its PSA target.
- 6.11 Map 6-1 below shows the extent of groundwater protection zones in Runnymede.

²⁶ Water Stressed Areas – Final Classification (Environment Agency) 2021. Available at: <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

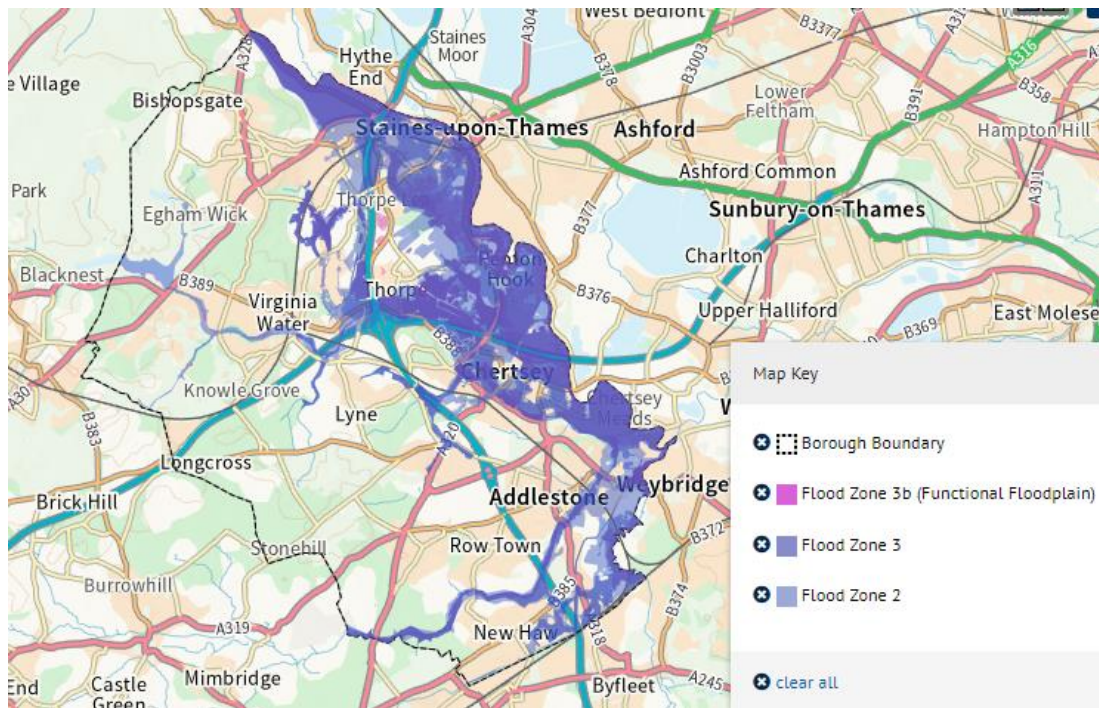
²⁷ Wey Catchment Abstraction licensing Strategy (Environment Agency) 2019

Map 6-1: Groundwater Protection Zones in Runnymede



6.12 Map 6-2 below shows the extent of areas at risk of fluvial flooding in Runnymede.

Map 6-2: Extent of Fluvial Flood Risk Zones in Runnymede



6.13 In Runnymede in October 2013 there were 12,418 properties in flood zone 2 and 8,620 residential properties in flood zone 3. With regard to commercial properties, 1267 were located within flood zone 2 and 668 commercial properties are located in flood zone 3.

- 6.14 According to the Strategic Flood Risk Assessment (2018)²⁸, the River Thames and its tributaries including the Addlestone Bourne, Chertsey Bourne and River Wey are the primary sources of flood risk in the Borough and it identifies that the floodplain of the Thames is fairly extensive in the east of the Borough due to the flat, low lying nature of the land. Other sources of fluvial flooding include the Hurst Ditch, Meadlake Ditch and the Moat which are all tributaries of the Chertsey Bourne system that flow southwards through Egham, Egham Hythe and Thorpe. In Runnymede more than 20% of properties lie within Flood Zone 3 (see Map 6-2).
- 6.15 The Borough contains no formal flood defences and there is a long record of flooding from rivers in the Borough, and in particular from the River Thames. Major recorded flood events occurred in 1898, 1947, 1968, 2003 and late 2013-early 2014.
- 6.16 The River Thames Scheme (RTS) is a proposed programme of projects to reduce flood risk in communities between Datchet and Teddington and includes the construction of 3 flood channels with the second section (channel) running from Egham Hythe to Chertsey. The scheme will help to reduce flood risk to hundreds of properties in Runnymede.

Future Baseline

- 6.17 Whilst the Water Environment Regulations and River Thames Basin Management Plan set targets for the status of water bodies in the Thames catchment, a number of issues identified involve actions which are beyond the scope of local planning such as sewage discharge and drainage from agriculture and transport. In a number of cases the achievement of objectives to reach 'Good' status by 2027 are identified as disproportionately expensive or burdensome. As such, without action from other sectors, the quality of Runnymede's waterbodies are unlikely to improve in the future. Therefore, in the absence of the plan, the future ecological and chemical status of waterbodies in Runnymede are unlikely to see improvement in the short to medium term.
- 6.18 Whilst the 2040 Local Plan cannot address issues of water quality beyond its scope it should ensure that development does not add to water quality issues by including or retaining policies for the use of sustainable drainage techniques, infiltration systems and drainage strategies to ensure that water leaving development sites is of a good quality. This can be integrated with biodiversity net gain and delivery of blue/green infrastructure to ensure a holistic approach to the natural environment.
- 6.19 In the absence of the plan the South East is likely to remain an area of serious water stress into the long-term. Affinity Water identify insufficient supply to meet demand but have set out measures to reduce the demand/supply balance up to 2080 including the aim to improve water efficiency to between 110-120 litres per person per day.
- 6.20 The impact of climate change is also likely to add to uncertainties on water quality and quantity. If, as predicted, summers become hotter and drier, water resources and freshwater environments would be placed at increased risk of water scarcity with a likely increase in demand from the population. High demand in periods of hot weather coupled with restricted availability of surface water supplies could also adversely affect groundwater and aquifers.
- 6.21 In this respect the 2040 Local Plan should include and/or retain policies to ensure water efficiency in new development is delivered in line with the aim to achieve 110-

²⁸ Runnymede Level 1 Strategic Flood Risk Assessment (RBC) 2018. Available at: <https://www.runnymede.gov.uk/planning-policy/planning-policy-evidence-based-documents/5>

120 litres per person per day. The 2040 Local Plan could also consider other water efficiency measures such as greywater harvesting and recycling techniques.

- 6.22 If, as predicted, warmer and wetter winters become more prevalent, the increased incidence of heavy and intense rainfall could result in an increased risk of flooding from fluvial sources and non-fluvial sources. Whilst the River Thames Scheme, if delivered, will reduce fluvial flood risk to some properties in Runnymede, others will remain in high risk areas. The extent of fluvial flood risk (with an allowance for climate change modelled) in the Borough is therefore unlikely to change significantly in the future.
- 6.23 However, in the absence of the plan the NPPF directs new development away from areas of highest risk and the River Thames Scheme does not require the Local Plan for its delivery. Nevertheless, the 2040 Local Plan should ensure that the sequential approach to flood risk and support for the River Thames Scheme are included or retained in relevant policies. As set out above, the use of sustainable drainage and infiltration techniques should also be followed to attenuate surface water run-off.
- 6.24 Based on the above, Table 6-3 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 6-3: Issues/Problems for Water

Issue/Problem	Source	How Local Pan can Address Issue	Relationship to Other PPPs
Ecological/Chemical quality of waterbodies in Runnymede continues to deteriorate or fails to improve	Baseline Information	Whilst some impacts on local waterbodies are beyond the scope of the Local Plan to control, the 2040 Local Plan should ensure use of SuDS and drainage strategies in new development to ensure water quality.	A Green Future- Improving at least three quarters of our waters to be close to their natural state as soon as is practicable. Surrey's 2050 Place Ambition - pursuing opportunities for improving biodiversity and the air and water environment alongside new development. Creating a coherent connected network of accessible multi-functional greenspaces. NPPF - Development should, wherever possible, help to improve local environmental conditions such as air and water quality.
Runnymede is within an area of serious water stress.	Baseline information	Local Plan should include or retain policies for water efficiency which go beyond the Building Regulations and include	Affinity Water Resource Management Plan - aim to reduce water use to between 110 and 120 litres per

		a requirement for greywater recycling.	person per day by 2045.
Extensive areas of the Borough are and likely to remain in areas at highest risk of fluvial flooding including climate change impacts.	Baseline Information	Local Plan will need to follow NPPF sequential approach to flood risk and give support for the River Thames Scheme and any other flood defence/alleviation projects	<p>NPPF - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources.</p> <p>Surrey Flood Risk Management Strategy - reduce the risk of flooding to and from development through local planning policy and processes.</p>

7. Baseline Information – Air & Noise

- 7.1 Vehicle emissions are now the principle source of air pollution in the UK given the decline of using coal for domestic heating or in coal-fired power stations. Emissions from vehicles can include carbon monoxide, carbon dioxide, oxides of nitrogen, volatile organic compounds (VOC) and particulate matter (PM). These pollutants can have a detrimental effect on human health and the natural and built environment.
- 7.2 NO₂ can also have adverse effects on natural habitats which are dependent on low levels of nutrients such as the lowland heathland covered by the Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham Common SAC. The Department of Transport's Transport Analysis Guidance²⁹ states that beyond 200m the contribution of vehicle emissions from the roadside to local pollution levels is not significant. The majority of highways within Runnymede do not lie within 200m of the SPA/SAC, but several do, including the M3 motorway, Longcross Road and Chobham Lane.
- 7.3 Table 7-1 below sets out the UK's air quality objectives for a number of pollutants for protection of human health and for the protection of vegetation and ecosystems.

Table 7-1: UK Air Quality Objectives for Human Health & Ecosystems

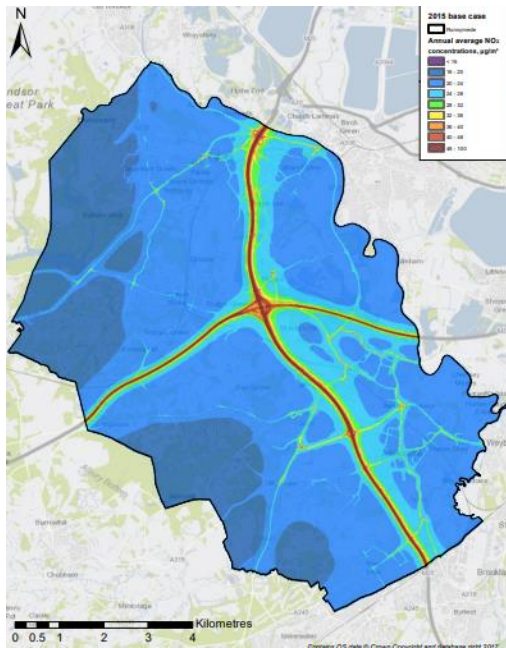
Pollutant	Objective
Human Health	
Nitrogen Dioxide	40µg/m ³ (annual mean)
Sulphur Dioxide	125µg/m ³ (24 Hour Mean, not to be exceeded more than 3 times a year)
PM10	40µg/m ³ (annual mean)
PM2.5	25µg/m ³ (annual mean)
Ecosystems	
Nitrogen Dioxide	30µg/m ³ (annual mean)
Sulphur Dioxide	20µg/m ³ (annual mean)

- 7.4 Air quality in Runnymede is generally good. Runnymede Borough Council published an Air Quality Modelling Report from Cambridge Environmental Research Consultants in 2018³⁰ which modelled a baseline scenario for 2015 and again in 2036 with the adoption of the 2030 Local Plan. Map 7-1 shows the baseline scenario in 2015, with red/orange colours indicating higher annual average NO₂/PM10 & PM2.5. As can be seen higher annual average NO₂/PM10/PM2.5 occurs around major highways in the Borough including the M3, M25, A320 and A317.

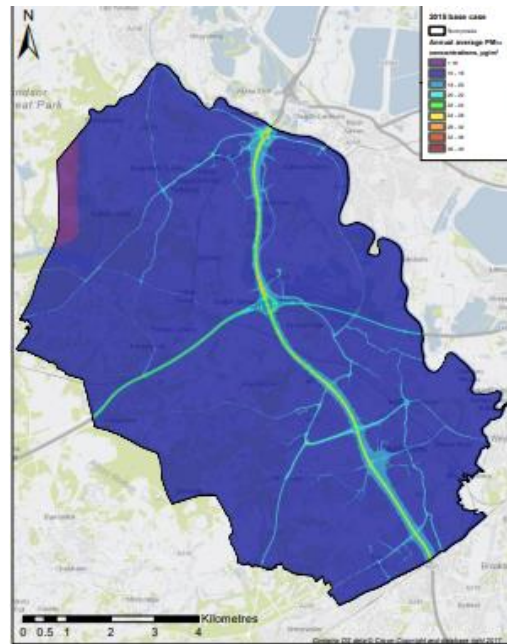
²⁹ Transport Analysis Guidance: TAG Unit A3 (DfT) 2021. Available at: <https://www.gov.uk/government/publications/tag-unit-a3-environmental-impact-appraisal>

³⁰ Runnymede Air Quality Modelling Report (Cambridge Environmental Research Consultants) 2018. Available at: <https://www.runnymede.gov.uk/planning-policy/planning-policy-evidence-based-documents/2>

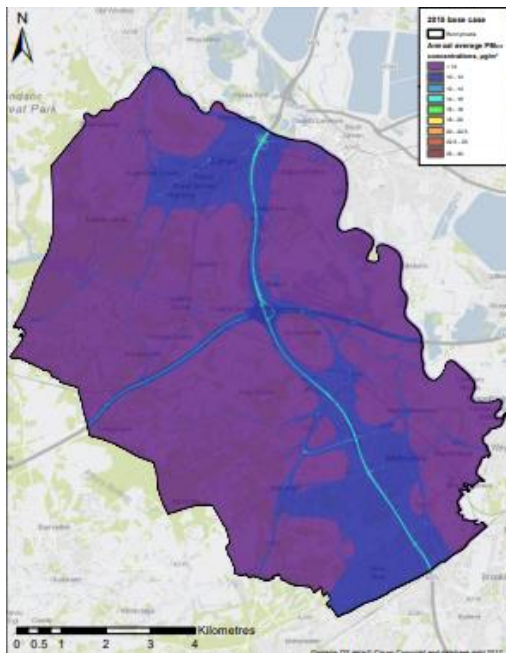
Map 7-1: Air Quality Modelling Baseline Scenario 2015



NO₂



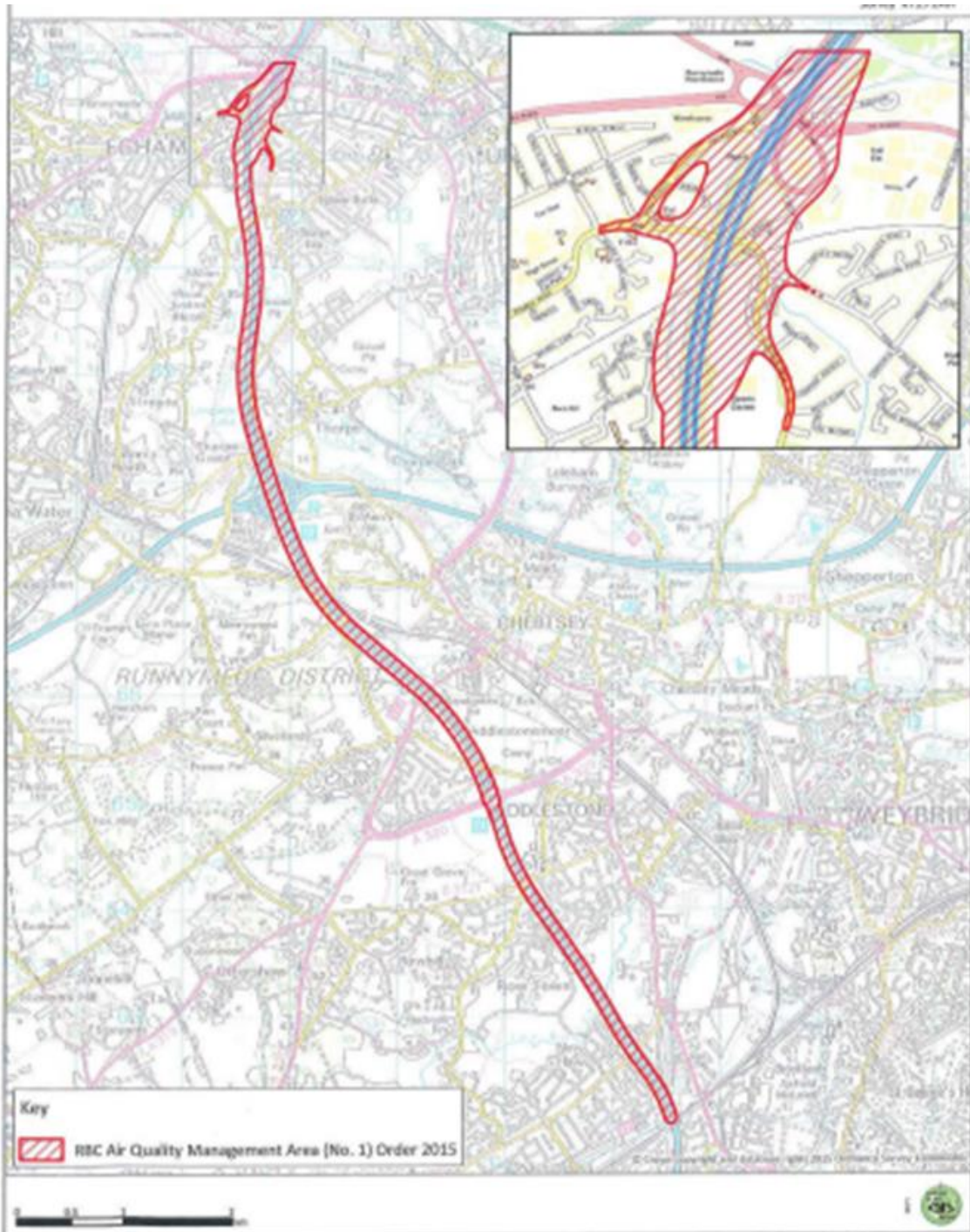
PM10



PM2.5

7.5 However, two traffic related Air Quality Management Areas (AQMAs) have been declared for nitrogen dioxide (NO₂) and particulate matter (PM10): one adjacent to the M25 (see Map 7-2) which was extended in 2015 to include Vicarage Road in Egham and the other in Addlestone at the Brighton Road/Church Road/Station Road/ High Street junction (see Map 7-3).

Map 7-2: Extent of M25 AQMA in Runnymede



Map 7-2: Extent of Addlestone AQMA



- 7.6 Air quality results for NO₂ from monitoring stations between 2016 and 2020 within Runnymede are shown in Table B-5 in Appendix B. The results show that in some locations air quality is improving and in others deteriorating when comparing 2016 to 2019 (2019 is used for comparison being prior to the Covid-19 pandemic). Exceedance of air quality objectives for NO₂ were reported in 2019 at High Street and Wyvern Place in Addlestone, Weir Road and Bridge Road in Chertsey, Vicarage Road in Egham and at the Ottershaw Roundabout.
- 7.7 The Runnymede Air Quality Annual Status Report (2020)³¹ states that both PM10 and PM2.5 are not monitored in Runnymede, however modelling work indicates they do not exceed air quality objectives and neither does Sulphur Dioxide.
- 7.8 Although background concentrations of nitrogen oxides in Runnymede are largely below air quality objectives for the protection of human health, the current levels can affect sensitive ecological receptors.

³¹ Runnymede Air Quality Annual Status Report (RBC) 2020. Available at: <https://www.runnymede.gov.uk/pollution/air-quality-1/3>

7.9 Runnymede lies within a short distance of The Thursley, Ash, Pirbright and Chobham SAC and Thames Basin Heaths SPA at Chobham Common. Air quality data from the Air Pollution Information System (APIS)³² shows results for Nitrogen deposition and Sulphur Dioxide at locations taken within Chobham Common adjacent to highways in or near Runnymede. The critical load for nitrogen deposition is 10-20kgN per hectare per year. This is shown in Table 7-2 and data is 2017-2019 3 year mean at a resolution of 5km.

Table 7-2: Concentrations of Air Pollutants at Chobham Common

Location	OS Reference	Grid	Concentration N	Concentration SO ₂
Staple Hill/Longcross Rd	497912, 165117		13.02KgN	1.1µg/m ³
Windsor Road (adj M3)	496542, 164514		12.88KgN	1.36µg/m ³

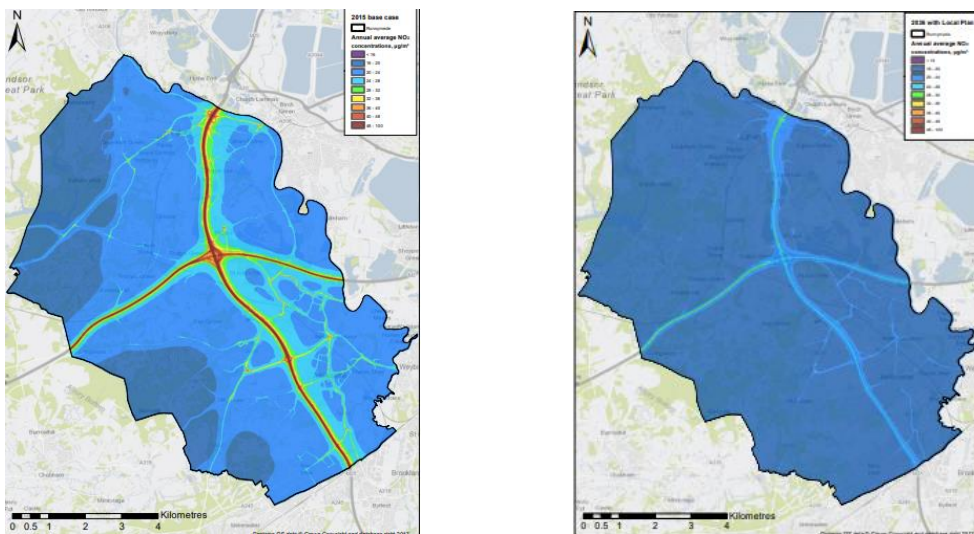
7.10 Table 7-2 shows that for locations at Chobham Common close to Runnymede nitrogen deposition exceeds minimum critical loads but is significantly lower than critical loads of 20µg/m³.

7.11 Main sources of noise in the Borough are road traffic, especially from the M3 and M25, rail movements and aircraft noise from Heathrow Airport. The latter mainly affects the area to the north of the Borough in Egham and Englefield Green. Other sources of noise include some business premises, the night-time economy and construction operations. Fair Oaks airfield to the south of Ottershaw is also a noise generating use.

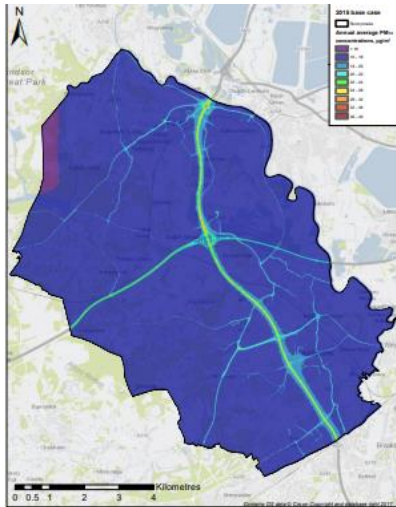
Future Baseline

7.12 Map 7-4 shows the modelled air quality in Runnymede in 2036 as taken from the Air Quality Modelling Report 2018³⁰ as compared to the 2015 baseline. This is the predicted future baseline with the now adopted 2030 Local Plan but in the absence of the 2040 Local Plan.

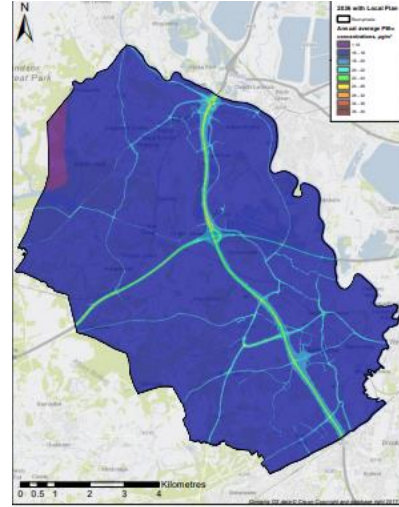
Map 7-4: Air Quality Modelling Scenario 2036



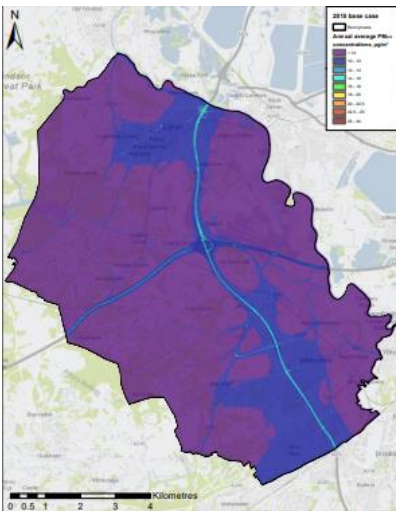
2015 NO₂



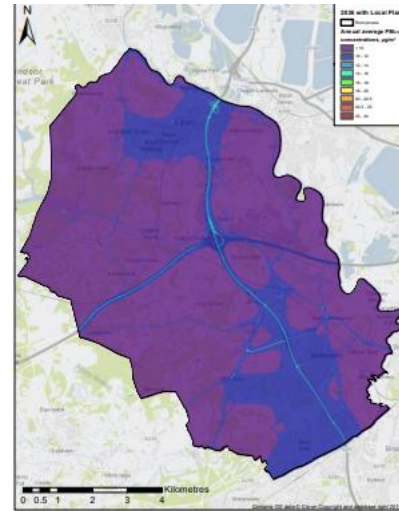
2036 NO₂



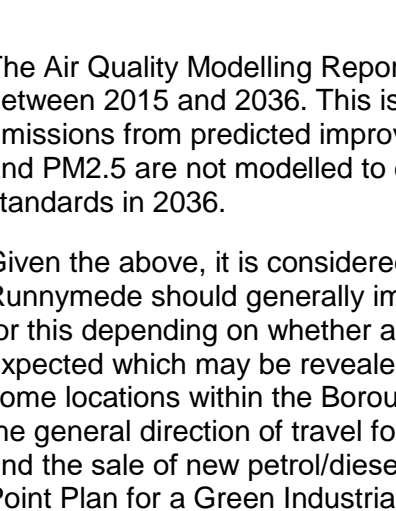
2015 PM10



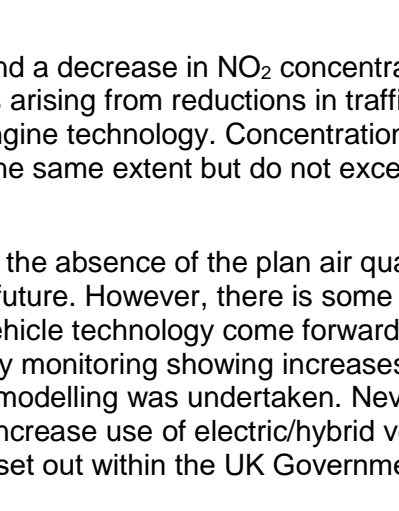
2036 PM10



2015 PM2.5



2036 PM2.5



7.13 The Air Quality Modelling Report of 2018 found a decrease in NO₂ concentrations between 2015 and 2036. This is explained as arising from reductions in traffic exhaust emissions from predicted improvements in engine technology. Concentrations of PM10 and PM2.5 are not modelled to decrease to the same extent but do not exceed the standards in 2036.

7.14 Given the above, it is considered that even in the absence of the plan air quality within Runnymede should generally improve in the future. However, there is some uncertainty for this depending on whether advances in vehicle technology come forward as expected which may be revealed by air quality monitoring showing increases in NO₂ in some locations within the Borough since the modelling was undertaken. Nevertheless, the general direction of travel for policy is to increase use of electric/hybrid vehicles and end the sale of new petrol/diesel vehicles as set out within the UK Government's Ten Point Plan for a Green Industrial Revolution.

7.15 Improvements in air quality may also depend on the levels of congestion in the borough into the future and this is uncertain. However, the Highways Authority is currently preparing a Local Cycling & Walking Strategy for the Borough and planned

improvements to the A320 corridor may help to manage congestion, although some of these improvements could be off-set by the construction of a third runway at Heathrow Airport, if this were to go ahead.

- 7.16 In this respect the 2040 Local Plan will need to carefully consider the spatial strategy for the Borough to ensure sustainable patterns of development which in turn can aid sustainable patterns of travel. 2040 Local Plan policies should also include and/or retain policies which give support to schemes for improving public transport, walking and cycling infrastructure and electric vehicle charging infrastructure as well as include and/or retain policies which ensure development does not give rise to or is affected by adverse air quality impacts.
- 7.17 In terms of noise, the future baseline is uncertain. The construction of a third runway at Heathrow Airport may give rise to further noise impacts to the north of the Borough and although advances in vehicle technology may reduce some traffic engine noise over time, noise from vehicle movements as a whole may not reduce. Whilst noise from construction is uncertain, impacts should largely be over the short-term. The 2040 Local Plan should include/retain policies to protect development and existing businesses and property from noise impacts. This will also need to be considered for any development allocations.
- 7.18 Based on the above, Table 7-3 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 7-3: Issues/Problems for Air & Noise

Issue/Problem	Source	How Local Plan can Address Issue	Relationship to Other PPPs
New development could generate additional traffic related emissions and increase/sustain congestion levels.	Baseline Information	The 2040 Local Plan should ensure sustainable patterns of development and support strategies and improvements to public transport/cycling/walking infrastructure and connections.	<p>Gear Change - Accelerating modal shift to public and active transport; ensure active travel is embedded in wider policy.</p> <p>Decarbonising Transport - embed transport decarbonisation principles in spatial planning and across transport policymaking.</p> <p>NPPF - Significant development should be focused on locations which are or can be made sustainable.</p> <p>Transport Strategy for the South East - integrated approach to land use and transport planning; A network that promotes active travel and active</p>

			<p>lifestyles to improve our health and wellbeing; Improved air quality supported by initiatives to reduce congestion and encourage further shifts to public transport; A reduction in the need to travel</p> <p>Draft Local Transport Plan 4 - Establish '20-minute neighbourhoods' Ensure new development is focussed around sustainable travel options.</p>
Improvements in vehicle technology may not advance as expected.	Baseline Information	The 2040 Local Plan should include/retain policies for provision of EV charging infrastructure.	<p>Ten Point Plan for Green Industrial Revolution - accelerating the shift to zero emission vehicles.</p> <p>Greener Futures Climate Change Delivery Plan - Roll out EV charge point infrastructure.</p>
Development affected by existing air quality impacts.	Baseline Information	Location of 2040 Local Plan allocations should consider impact to and from air quality.	NPPF - preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution
Development and/or existing property/businesses exposed to noise impacts.	Baseline Information	Location of 2040 Local Plan allocations, including mixed uses should consider impact to and from noise. 2040 Local Plan should include/retain policies for noise impacts.	<p>Noise Policy Statement for England - avoid significant adverse impacts on health and quality of life. Mitigate and minimise adverse impacts on health and quality of life.</p> <p>NPPF - mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality.</p>

8. Baseline Information – Climate

- 8.1 The Intergovernmental Panel on Climate Change (IPCC) 2022 report³³ finds that human-induced climate change, including more frequent and intense extreme events, has caused widespread adverse impacts and related losses and damages to nature and people, beyond natural climate variability.
- 8.2 The IPCC report sets out that there is high confidence that climate change has caused substantial damages and increasingly irreversible losses to ecosystems, reduced food and water security and adversely affected physical and mental health.
- 8.3 Predicted effects of climate change for the south east of England include hotter drier summers and milder but wetter winters with more intense rainfall events. This has the potential to increase flood events both in terms of risk and severity, damage to native habitats and migration of species and/or potential extinction of native plants and animals.
- 8.4 The latest UK Climate Projections (UKCP) 2018³⁴ highlight that average temperature in the UK 2009-2018 been 0.3°C warmer than the period 1981-2010 and 0.9°C warmer than the period 1961-1990. The 2009-2018 period was also 1% wetter than 1981-2010 and 5% wetter than 1961-1990, although in winter periods these percentages increase to 5% and 12% respectively.
- 8.5 UKCP projections to 2070 set out that in a high emissions scenario average summer temperatures could increase within a range of 0.9°C to 5.4°C in summer and 0.7°C to 4.2°C in winter. The number of ‘hot’ spells, defined as daytime temperatures reaching 30°C for 2 or more consecutive days, rises from 0.2 per year to 4.1 by 2070.
- 8.6 In terms of rainfall, the projections set out a -47% to +2% change in summer and -1% to +35% in winter, indicating that the scenario of hotter drier summers and warmer and wetter winters is still probable. Sea level rise in London is projected to be 0.29m to 0.7m in a low emissions scenario and 0.53m to 1.15m in a high emissions scenario.
- 8.7 The Climate Change Act 2008 sets out legally binding targets of reducing carbon dioxide to 80% below 1990 levels by 2050 and at 28-32% by 2020. The act has since been amended and now contains the commitment to reach net zero by 2050.
- 8.8 Emissions data³⁵ on carbon dioxide emissions (from Runnymede over the period 2014 to 2018) is shown in Table 8-1 by sector.

Table 8-1: Carbon Dioxide Emissions in Runnymede by Sector (Kt CO₂)

Year	Commercial & Industry	Domestic	Transport	Total	Total per Capita
2014	169.4	152.0	124.0	445.5	5.3
2015	155.6	146.6	124.1	426.3	5.0
2016	135.1	139.5	126.2	400.9	4.6
2017	122.6	129.9	123.6	376.1	4.3
2018	124.1	129.9	120.5	374.5	4.3

³³ Climate Change 2022 (IPCC) 2022. Available at: <https://www.ipcc.ch/report/ar6/wg2/>

³⁴ UK Climate Projections: Headline Summary (Met Office) 2021. Available at: <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp>

³⁵ Carbon Dioxide Emissions Statistics (BEIS) 2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018>

- 8.9 The data shows that emissions per capita in Runnymede fell from a figure of 5.3 tonnes per capita in 2014 to 4.3 tonnes per capita in 2018.
- 8.10 The total tonnes of carbon dioxide produced in Runnymede also fell from 445.5 tonnes in 2014 to 374.5 tonnes in 2018 a reduction of 71 tonnes over the 5 year period (16%). The largest contributor to carbon dioxide emissions in Runnymede in 2018 was the domestic sector, followed by commercial & industrial and then transport. In all three sectors the general trend is of falling emissions with domestic and commercial & industrial showing the greatest falls of 15% and 27% respectively.
- 8.11 Emissions from Transport have not fallen as sharply decreasing by only 3%, although in this same period vehicle miles travelled in Surrey³⁶ have increased from 8,780m in 2014 to 9,079m in 2018. The number of vehicle miles travelled in Surrey in 2020 saw a sharp decrease to 7,104m due to the Covid-19 pandemic, a decrease of 22% on 2018.
- 8.12 Renewable energy capacity in Runnymede in 2020³⁷ is estimated at 11.7MW, predominantly from photovoltaics (3MW), anaerobic digestion (2.4MW), sewage gas (1.3MW) and landfill gas (5MW). This is an increase from 2014 of 1.6MW, mostly from photovoltaics increasing from 1.5MW to 3MW.
- 8.13 In terms of climate change and flood risk, this has been considered within section 6 on Water.

Future Baseline

- 8.14 In the absence of the plan unavoidable climate change will still occur.
- 8.15 Given the potential for more intense rainfall events coupled with the amount of existing hard landscaping in and around the urban areas of the Borough the incidence of flooding from non-fluvial sources is likely to increase with the advent of climate change.
- 8.16 Hotter, drier summers are also likely to impact on water security and quantity and as has already been discussed in other sections, the south east is already an area of serious water stress and several local waterbodies indicate that poor water quality is to some degree caused by drought. This is likely to continue in the face of climate impacts. Hotter summers are also likely to exacerbate the urban heat island effect in summer months and the number of 'hot' spells are also projected to increase which is likely to give rise to impacts on human health especially the elderly and frail. Hotter, drier summers will also impact biodiversity through species distribution/migration and potential for increased risk of heathland/woodland fires.
- 8.17 In this respect the 2040 Local Plan should ensure that development proposals are resilient to climate impacts through adaptive measures and that proposals can reduce their impact through design and physical mitigation measures. As such the 2040 Local Plan should include/retain policies which seek to reduce the impact of climate change through design i.e. orientation, passive solar gain/shading, use of sustainable drainage, use of green/blue infrastructure and landscaping. Where the 2040 Local Plan has scope to do so, policies which go beyond water efficiency than set out in the Building Regulations should be included/retained as well as measures for greywater recycling/rainwater harvesting.

³⁶ <https://roadtraffic.dft.gov.uk/local-authorities/135>

³⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/743822/Renewable_electricity_by_Local_Authority_2014-2017.xlsx

- 8.18 In the absence of the plan, the Council has an adopted Green & Blue Infrastructure (GBI) SPD which sets out guidance for achieving GBI in new developments. Whilst the SPD is a material consideration in decision making it is not policy and as such the 2040 Local Plan could seek to place some of the guidance from the SPD into policy to ensure it carries greater weight and plays a role in mitigating/adapting to climate change impacts.
- 8.19 Whilst it could be considered that globally carbon dioxide emissions will continue to rise in the future, the trend in Runnymede is of falling carbon dioxide emissions, most notably from the domestic and commercial & industrial sectors. The trend of falling emissions from the domestic sector is likely to continue as further domestic energy efficiency measures and strategies are progressed and implemented, even in the absence of the plan.
- 8.20 Future emissions from the commercial & industrial sector are uncertain as it depends on whether the falling trend has been through changes in building efficiencies/worker behaviour or simply whether the commercial & industrial sector in Runnymede has changed in nature. The increased role of staff working from home since the Covid-19 pandemic may continue into the future which should further drive down emissions in this sector, although this may be at the expense of increased emissions in the domestic sector as people heat their homes to work.
- 8.21 However, as highlighted in the Surrey Climate Change Strategy, a certain amount of emissions reductions in the domestic and commercial/industrial sectors will have been through decarbonisation of the national grid. As such, it is uncertain whether the pace of emission reductions will continue into the future.
- 8.22 In the absence of the plan, the reliance on travelling by car is likely to continue in the future. Whilst this sector has not seen falls in emissions as big as the domestic or commercial/industrial sectors, the general trend is however one of falling emissions. Given the government's drive to zero emission vehicles by 2050, even in the absence of the plan emissions from this sector should decrease over time, however this is likely to be over the medium to longer term, as technological advances are brought forward.
- 8.23 In this respect the 2040 Local Plan should seek to encourage greater use of active and sustainable forms of travel and reduce reliance on car usage. The 2040 Local Plan will therefore need to consider the location of development and whether this can help to achieve sustainable travel patterns as well as include/retain policies which support measures and strategies to improve the attractiveness, access and connections to/from active and sustainable travel infrastructure. Support for EV charging infrastructure and other technological advances should also be included and the Local Plan could also consider other alternatives on how development can reduce travel demand i.e. car clubs/car share.
- 8.24 In the absence of the plan the trend of building renewable energy/low carbon capacity should continue into the future as the current Local Plan has a policy (SD8) for new development to deliver low carbon/decentralised networks and to achieve a certain percentage of energy demand to be delivered by renewable energy technologies. Given the uncertainty that the pace of emissions reduction in the domestic and commercial/industrial sectors will continue, the 2040 Local Plan should include/retain policies to achieve increased use of renewable/low carbon technologies and could seek further capacity in new development whilst supporting stand-alone schemes.
- 8.25 Based on the above, Table 8-2 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 8-2: Issues/Problems for Climate

Issue/Problem	Source	How Local Plan can Address Issue	Relationship to Other PPPs
<p>Increase prevalence of hotter, drier summers, number of 'hot' spells and intense rainfall events and impact to human health and natural environment.</p>	<p>Baseline Information</p>	<p>The 2040 Local Plan will need to ensure that development is resilient to and mitigates climate impacts by including/retaining policies on flood risk, sustainable drainage, design, green/blue infrastructure and water efficiency.</p>	<p>A Green Future - New homes will be built in a way that reduces demands for water, energy and material resources, improves flood resilience, minimises overheating and encourages walking and cycling.</p> <p>NPPF - Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts...</p> <p>Surrey Flood Risk Management Strategy - reduce the risk of flooding to and from development through local planning policy and processes.</p> <p>Affinity Water Resource Management Plan - aim to reduce water use to between 110 and 120 litres per person per day by 2045.</p>
<p>Reliance on car journeys continues into the future.</p>	<p>Baseline Information Relevant PPPs</p>	<p>2040 Local Plan spatial strategy will need to ensure sustainable patterns of development to encourage sustainable travel and support measures/strategies to improve access, connectivity and attractiveness of active and sustainable travel infrastructure. 2040 Local Plan should also support EV charging infrastructure and other measures to reduce demand.</p>	<p>Road to Zero - By 2050 we want almost every car and van to be zero emission.</p> <p>NPPF - Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.</p> <p>PPG Climate Change - effective spatial planning is an important part of a</p>

			<p>successful response to climate change as it can influence the emission of greenhouse gases.</p> <p>Draft Surrey Local Transport Plan 4 - Ensure that new development is focussed around sustainable travel options</p> <p>Greener Futures Climate Change Delivery Plan - Roll out EV charge point infrastructure.</p>
Pace of Carbon Dioxide emission reductions from domestic and commercial/industrial sectors slows	Baseline Information	The 2040 Local Plan should continue policies which seek to ensure development includes and/or connects to renewable/low carbon technologies and supports stand-alone schemes.	Greener Futures Climate Change Delivery Plan - Contribute to decarbonisation of electricity grid by increasing capacity of renewable energy by 1,244MW of low carbon electricity.

9. Baseline Information – Material Assets

- 9.1 Although there is no set definition of what constitutes material assets, this section will focus on housing, infrastructure and minerals.
- 9.2 As at Census 2011 there were 31,659 dwellings in Runnymede. Since the 2011 Census there have been 2,847 completions 2012-2021, bringing the total number of dwellings to 34,506. The 2011 Census shows that the majority of housing in Runnymede is owned (75%) with 60% of housing being detached or semi-detached and 20% flats or maisonettes. The majority of owned dwellings are 3 or 4 bed dwellings whilst in the affordable sector the majority of dwellings are 1 or 2 bed dwellings. Lower quartile rents in the Borough are around £950 per month as at 2016³⁸.
- 9.3 The Runnymede Gypsy & Traveller Accommodation Assessment (GTAA)³⁹ identifies 60 authorised Gypsy & Traveller pitches in the Borough as at November 2017 and 59 on unauthorised sites. Since the GTAA was undertaken a further 5 pitches have been granted permission by the Council. As at November 2017 there were 15 Travelling Showperson plots on authorised sites and 37 on unauthorised sites.
- 9.4 The Borough is served by a number of infrastructure services/facilities which also serve the wider area. Major Infrastructure include the M3 and M25 Motorways; sewage treatment works at Chertsey; St Peter's Hospital, Chertsey; Addlestone, Byfleet & New Haw, Chertsey, Egham, Longcross and Virginia Water Rail Stations; five secondary schools, 24 infant/junior/primary schools and one leisure centre at Egham.
- 9.5 The major local highways within the Borough and wider area include the A30 London Road which runs from the Meadows Gyratory in Camberley to Staines as well as the A320 linking Woking with Junction 11 of the M25 and the A317 which links St Peter's Hospital through to Weybridge and Junction 11 of the M25. The Borough also contains Junction 13 of the M25 at Egham and Junction 2/12 of the M3/M25 at Chertsey.
- 9.6 The Surrey Minerals Plan: Primary Aggregates Development Plan Document (DPD)⁴⁰ identifies four preferred areas for mineral extraction in Runnymede. This includes an extension to Addlestone Quarry, Hamm Court Farm in Chertsey, Milton Park Farm & Whitehall Farm in Egham. All preferred sites are for concreting aggregates with an estimated combined yield of 4.96m tonnes.

Future Baseline

- 9.7 Even in the absence of the plan, increasing population levels will see increasing need and demand for housing into the future including for affordable dwellings and Gypsy/Traveller & Travelling Showperson pitches and plots. The main type of occupation will continue to be owned rather than rented. 2030 Local Plan Policy SL19 sets out the mix of units required on developments of 10 or more units, and this may see more smaller units being delivered into the future, although when compared to the existing stock, it is unlikely to change the Borough's dwelling profile significantly.

³⁸ Runnymede & Spelthorne Strategic Housing Market Assessment Partial Update (GL Hearn) 2018. Available at: <https://www.runnymede.gov.uk/planning-policy/planning-policy-evidence-based-documents/7>

³⁹ Runnymede Gypsy & Traveller Accommodation Assessment (ORS) 2018. Available at: <https://www.runnymede.gov.uk/planning-policy/planning-policy-evidence-based-documents/6>

⁴⁰ Surrey Minerals Plan: Primary Aggregates DPD (SCC) 2011. Available at: <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/minerals-core-strategy-development-plan/adopted-primary-aggregates-development-plan>

- 9.8 The 2040 Local Plan will therefore need to consider requirements for new housing and include/retain policies for affordable units and pitches/plots for Gypsies/Travellers and Travelling Showpeople. The 2040 Local Plan should also include/retain policies on the mix of housing to come forward.
- 9.9 In the absence of the plan an increasing population is also likely to increase pressures on existing services/facilities. The Runnymede Infrastructure Delivery Plan⁴¹ outlines the infrastructure needed to support growth, as set out in the 2030 Local Plan, and is accompanied by a series of infrastructure schedules outlining projects to meet needs. 2030 Local Plan allocation policies also identify a number of infrastructure requirements including improvements to the A320, health facilities at two allocations and green infrastructure requirements. The overall costs of projects exceed known funding streams and although Runnymede introduced the Community Infrastructure Levy (CIL) in 2021, there is likely to be a continuing shortfall in infrastructure funding in the future and hence pressure on services/facilities are likely to remain.
- 9.10 The 2040 Local Plan will need to consider the implications for infrastructure from an increase in population and include/retain policies to identify and focus on delivery of infrastructure requirements and projects.
- 9.11 There will be a continuing need for mineral extraction in the future. Even in the absence of the plan, minerals will be required for building and infrastructure projects across the UK into the future. Should each preferred area come forward this is likely to increase noise and road traffic impacts in the short to medium term. Each of the preferred areas for aggregate extraction has a restoration scheme outlined within the Surrey Minerals Plan Site Restoration Supplementary Planning Document (2011). Restoration includes to agricultural (grazing) and woodland end use, as well as informal recreational, landscape and nature conservation.
- 9.12 Control of mineral extraction and resulting noise/traffic is largely beyond the scope of the 2040 Local Plan. However, including policies on green/blue infrastructure and biodiversity net gain more generally should aid in the restoration of such areas.
- 9.13 Based on the above, Table 9-1 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 9-1: Issues/Problems for Material Assets

Issue/Problem	Source	How Local Pan can Address Issue	Relationship to Other PPPs
Increasing population places demand for new housing.	Baseline Information	2040 Local Plan will need to consider housing need requirements and include/retain policies for affordable units and Gypsy/Traveller & Travelling Showperson Pitches/Plots	NPPF - make sufficient provision for: housing (including affordable housing). Planning Policy for Traveller Sites - Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople.

⁴¹ Runnymede Infrastructure Delivery Plan (Aecom) 2017. Available at: <https://www.runnymede.gov.uk/planning-policy/planning-policy-evidence-based-documents/14>

<p>Increasing population places demands on existing infrastructure services/facilities.</p>		<p>2040 Local Plan will need to identify and focus on delivery of infrastructure projects, especially those critical to delivery of the Plan.</p>	<p>NPPF - make sufficient provision for: Infrastructure.</p> <p>Community Vision for Surrey - Well-connected communities, with effective infrastructure, that grow sustainably.</p>
<p>Minerals extraction will increase noise/traffic impacts.</p>		<p>Whilst control of traffic/noise impacts from mineral extraction is largely beyond the scope of the Local Plan, general policies on green infrastructure and biodiversity net gain should aid site restoration.</p>	<p>NPPF - essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.</p>

10. Baseline Information - Cultural Heritage (including Architectural & Archaeological Heritage)

10.1 The UNESCO World Heritage Convention (1972) defines the scope of cultural heritage as:

- Monuments – architectural works, works of monumental sculpture, elements of structures of an archaeological nature, inscriptions, cave dwellings and combinations of features which are of outstanding values from the point of view of history, art or science;
- Groups of buildings – groups of separate or connected buildings which, because of their architecture, their homogeneity or their place in the landscape are of outstanding universal value from the point of view of history, art or science; and
- Sites – works of man or the combined works of nature and man, and areas including archaeological sites, which are of outstanding universal value from the historical, aesthetic, ethnological or anthropological point of view.

10.2 Runnymede contains 307 statutory listed buildings including the grade I properties at Runnymede Park, Tite Hill; Founders Building, Royal Holloway College; Great Fosters, Stroude Road and Holloway Sanatorium, Stroude Road. A further 19 properties are grade II* listed. The Historic England risk register does not currently show any statutorily listed buildings at risk within Runnymede. There are also a number of locally listed structures.

10.3 There are also 8 Scheduled Ancient Monuments including bowl barrows at Longcross, Chertsey Abbey and Chertsey Bridge and 57 areas of high archaeological potential.

10.4 Runnymede has seven designated conservation areas within the borough. These are: Basingstoke Canal; Chertsey; Egham Hythe; Egham Town Centre; Englefield Green; Thorpe and Wey Navigation. These streets, buildings and locations are of special architectural interest or historic interest, and they receive additional protection from the Council.

10.5 The borough has a number of important historic parks and gardens, having more Grade I and II* than any other Surrey District. The largest area of historic parks and gardens is represented by Windsor Great Park, partially located within an area to the northwest of the borough. The Historic England at Risk Register shows that in 2022 Woburn Farm in Addlestone, a Grade II listed Historic Park and Garden is at risk and in declining condition.

Future Baseline

10.6 In the absence of the plan, the continuing demand for development will continue and could place the borough's historic heritage assets at increased risk of disturbance, damage and irretrievable loss. Effects are likely to be amplified as a result of changes in the UK's climate such that long periods of hot dry weather and increased precipitation during winter periods could all having cumulative and synergistic effects on both archaeological and built heritage assets.

10.7 The number of heritage assets are unlikely to change significantly in the future, although Historic England/ the Council could designate additional statutorily/locally listed buildings in the future if they were considered of architectural or historical merit.

- 10.8 The Historic Park & Garden at Woburn Farm is identified as at risk by Historic England. In the absence of the plan, this is likely to continue into the future, however, the buildings and structures already listed should continue to enjoy statutory or local protection in the future and the protection afforded by the NPPF and policies in the 2030 Local Plan.
- 10.9 The 2040 Local Plan should therefore ensure the continued protection of the historic environment and heritage assets, protection against loss, damage and disturbance. The 2040 Local Plan could also consider whether there is policy scope to help improve the status of Woburn Farm and its removal from the at Risk Register.
- 10.10 Based on the above, Table 10-1 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 10-1: Issues/Problems for Cultural Heritage

Issue/Problem	Source	How Local Plan can Address Issue	Relationship to Other PPPs
Demand for development and climate impacts places heritage assets at risk.	Baseline Information	The 2040 Local Plan should include/retain policies for the protection of the historic environment and heritage assets.	NPPF - assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.
Woburn Farm identified on English Heritage at risk register.	Baseline Information	The 2040 Local Plan could consider whether there is scope to include policies for improving the site at Woburn Farm.	NPPF - Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.

11. Baseline Information – Landscape/Townscape

- 11.1 The European Landscape convention defines landscape as ‘*An area as perceived by people, whose character is the result of the action and interaction of natural and/or human factors*’ and landscape character is defined as ‘*distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than being better or worse*’.
- 11.2 There are no national or internationally recognised landscape designations in Runnymede. However, Natural England has undertaken a National Character Areas (NCA) study which categorise areas in England with similar landscape characteristics by region.
- 11.3 The southern area of Runnymede falls into an NCA defined as Thames Basin Heaths and the north falls within the Thames Valley NCA⁴². The Thames Basin Heaths NCA lies in the London Basin. The Basingstoke, Wey Navigation, and Kennet and Avon canals provide a corridor for transport, recreation and wildlife. The east comprises considerable modern development juxtaposed with undulating expanses of heathland, woodland and plantations. Non-native trees and rhododendron are distinctive in this area. Key characteristics particularly relevant to Runnymede include:
- Conifers and large plantations on former heathland are dominant features in the east;
 - Acid, leached soils mean that farming on the plateaux is limited to rough pasture, and that alternative land uses (such as forestry, golf courses and horse paddocks) have emerged;
 - Beyond the large areas of heathland and woodland, there is a patchwork of small to medium-sized fields with woods. The legacy of historic hunting forests includes veteran trees, ancient woods, ancient hedgerows and parklands;
 - Large, continuous mosaics are found in the east: they include Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), and Chobham Common National Nature Reserve (NNR).
 - Valley floors are wet with ditches, numerous watercourses, ponds, waterfilled gravel pits, reedbeds and carr. Historic features include mills, relict water meadows, and canals such as the River Wey Navigations.
- 11.4 The Thames Valley NCA is described as a mainly low-lying, wedge shaped area including Windsor, Slough the Colne Valley and south west London fringes. The River Thames provides a unifying feature through a very diverse landscape of urban and suburban settlements, infrastructure networks, fragmented agricultural land, historic parks, commons, woodland, reservoirs and extensive minerals workings. Hydrological features dominate and the Thames and its tributaries and reservoirs which form the South West London Waterbodies SPA & Ramsar. Key characteristics particularly relevant to Runnymede include:
- Flat and low-lying land, rising to low, river-terraced hills;

⁴² Information on National Character Areas available at:
<https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

- Numerous hydrological features provide unity to an area which otherwise lacks homogeneity; these features include the River Thames and its tributaries, streams, lakes, canals and open waterbodies (the result of restored gravel workings);
- Farming is limited. Where it survives, grazed pasture is the major land use within a generally open, flat and featureless landscape. The field pattern is medium-scale and irregular, with smaller fields to the west. Localised areas of species-rich hay meadows provide a splash of colour in summer;
- Pockets of woodland, open grassland, parkland, wetlands and intimate meadows provide escape and tranquillity;
- Towards London in the east, the natural character of the area is overtaken by urban influences: a dense network of roads (including the M25 corridor), Heathrow Airport, railway lines, golf courses, pylon lines, reservoirs, extensive mineral extraction and numerous flooded gravel pits;
- To the south, the open Thames flood plain dominates, with its associated flat grazing land, becoming characterised by a number of formal historic landscapes on higher ground;
- The area has an urban character, and there are very few villages of more traditional character, although almost half of the area is Green Belt land;
- The river is closely associated with numerous historic places and cultural events, such as the signing of Magna Carta at Runnymede;
- The area is important for recreation, both for residents and visitors.
- Historic parkland and commons provide access to green space, the Thames Path National Trail runs the length of the NCA.

11.5 The Surrey Landscape Character Assessment⁴³ identifies a number of landscape typologies in Runnymede. It identifies river valleys and river floodplain predominantly in the east and north of the Borough with settled & wooded sandy farmland and sandy woodland in the south and west. The landscape types are described as follows:

- River Valleys - Comprises a number of separate areas of elevated river terrace fringing the floodplain which runs through the county. Characteristics include, diverse landscapes including pastoral and arable farmland, mixed woodland, industrial, and commercial uses; a variety of water bodies including rivers, canals, streams, excavation of sand and gravel to form lakes and ponds.
- River Floodplain - Consists of low-lying river terraces and valley bottoms following the courses of the rivers throughout the county. To the north, these include the wide floodplain of the Thames. Characteristics include the presence of water in the form of rivers, with channels, open water bodies and drainage ditches; significant internal and surrounding urban influences including Built Up Areas, roads and utilities.
- Settled & Wooded Sandy Farmland - Consists of a number of character areas, covering a wide area within the north-western part of the county with land cover consisting of a mixture of farmland, woodland and settlement. Characteristics include, rolling landscape; predominately farmland, with varying degrees of

⁴³ Surrey Landscape Character Assessment (Hankinson Duckett Associates) 2015. Available at: <https://www.surreycc.gov.uk/land-planning-and-development/countryside/strategies-action-plans-and-guidance/landscape-character-assessment>

settlement and woodland, with human influences including golf courses, horse paddocks, and nurseries; urban influence and activity from settlement and transport, increases to the north; heavily wooded in places, with heathland commons. A predominately intimate landscape, with intermittent views across farmland framed by woodland.

- Sandy Woodland - Comprises a number of dispersed character areas within the northern and western parts of the County, identified as relatively continuous tracts of woodland, with few interventions. Characteristics include an undulating landscape; predominately wooded with large mixed woodland blocks and plantations; Large lakes often secluded and within woodland; settlement is limited.

11.6 The built environment in Runnymede is dominated by a selection of small towns on the fringe of London. It largely comprises of residential and commercial development, plus supporting infrastructure, of which transportation is the most prominent. The urban areas of Runnymede lie predominantly in the east and north of the Borough comprising the settlements of Addlestone, Chertsey, Egham, Englefield Green, Ottershaw, Thorpe, Virginia Water and Woodham & New Haw. The Runnymede Design SPD⁴⁴ defines five different character types within the urban area. These include:

- Urban Centre - includes the commercial and retail town centres and extend beyond this along the main roads that lead to them. Characteristics include having the historic core in the main centres, linear high streets reflecting development of through routes; compact, fine grain, well defined streets and spaces, particularly designed for large numbers;
- Formal Suburban - a homogeneous feel, with house types and architecture being of a single era and consistent style. Comprises three sub-types:
 - i) Town - generally built before 1970; residential dwellings facing the street in parallel in terraces or semi-detached formations, commonly regular streets with a geometric or ordered pattern; high levels of homogeneity in type of dwelling (age, form, height, mass);
 - ii) Landscape – southern edge of Ottershaw, the northern edge of Englefield Green and in Virginia Water. generally built after 1960; residential dwellings facing the street in semi-detached or detached formations, but loosely grouped on larger than average plots; streets less well defined by buildings; greater evidence of trees and greenery influenced by a more distinctive setting; sense of space and width; commonly regular streets with a geometric or ordered pattern, or gentle curves, but with secluded cul-de-sacs;
 - iii) Riverside - particularly stretched along the Thames, especially around Egham and Hamm Court; generally built between 1920 and 1970; main streets run parallel to the river; short streets or cul-de-sacs elsewhere; plot sizes and orientation are influenced by proximity to river; clusters of buildings defined by association with river / river based uses; homogeneous suburban feel to buildings not river fronting; moderate levels of homogeneity in type of dwelling (age, form, height, mass), lower than average density.
 - iv) 21st Century Development - schemes that challenge the typical 'formal suburban' type by introducing denser and higher development. Non-

⁴⁴ Runnymede Design SPD (RBC – Tibbalds) 2021. Available at: <https://www.runnymede.gov.uk/planning-policy/preparation-supplementary-planning-documents/3>

traditional materials and colours, including modular; mix of traditional and non-traditional streets.

- Dispersed - western side of the borough is less developed than the east. The wilder heathland to the south, the central wooded slopes and Windsor Great Park to the north provides a rich environment for exclusive residential living, established early in the 20th Century on the Wentworth Estate. Low density housing in dispersed arrangements of detached dwellings in large plots off adopted or estate roads; plots not necessarily adjacent, but interspersed with more open areas; privately landscaped, managed environments distinct from more naturalistic country roads; individual detached dwellings and groups of dwellings set in large private grounds, and roadside boundary treatments vary, but are infrequently natural and often landscaped.
- Commercial - pure commercial / industrial areas within Runnymede are fairly limited. The Causeway is the main area of large footprint commercial activity; there are small industrial and trading estates in Chertsey and Thorpe Industrial Estate between Thorpe village and Pooley Green / Thorpe Lea. Weybridge Business Park is off the main Weybridge Road between Addlestone and Weybridge; areas with a significant commercial or industrial element; includes business parks and industrial estates within or on the edge of settlements;
- Institutions within the Green Belt - campus style institutions; buildings generally clustered in wider landscaped grounds; often have a main building, possibly with a historic origin; large single user on a site beyond recognised settlements;

11.7 74% of the Borough lies within the Metropolitan Green Belt. This is the first open land on the south west edge of the London Metropolitan area and much of Runnymede's Green Belt is used for open land uses such as mineral working and landfill, public utilities, motorways and their intersections, educational and other institutions, research and development establishments, hotel and conference centres and large scale recreational uses, all of which were largely established before the Green Belt was designated.

Future Baseline

11.8 In the absence of the plan, it is considered that many townscape features associated with the Borough will remain largely unchanged given that the existing pattern of development will remain the predominant style and form. However, population growth in Runnymede is likely to cause increased demand for housing, employment space and supporting social and community infrastructure (e.g. schools, hospitals and health centres, retail provision etc).

11.9 In the absence of the plan, town centres are likely to be areas of change given the existing allocations in the 2030 Local Plan for regeneration. Infilling and the redevelopment of areas are likely to see density gradually increase over time, although this is unlikely to occur in those areas of the Borough with a dispersed pattern of development. The advent of permitted development to change the use of offices and other employment uses to residential is likely to continue in the future, which could lead to changes in the character and function of these areas, especially in and around town centre locations and employment areas.

11.10 The 2040 Local Plan should ensure that development coming forward in the Borough is of a high quality and respects local context. Policies for the design of new development should therefore be included/retained. The 2040 Local Plan may also wish to identify areas of change in the Borough where permitted development rights could change the character and function of areas over time.

- 11.11 In the absence of the plan, allocations in the 2030 Local Plan in areas formerly designated as Green Belt, but now within the urban area will continue to come forward which is likely to change the character on the edge of settlement areas and the transition to adjoining landscapes, including at the Longcross Garden Village site. Some of these impacts will be negative in the short to medium term, as developments are constructed, and landscaping takes time to 'bed in'.
- 11.12 The extent of Green Belt designation and its associated functions will continue to be protected, even in the absence of the plan, given the general presumption against development set out in the NPPF and 2030 Local Plan. The general presumption, whilst a policy designation not a landscape or environmental designation, should also give continuing protection to the Borough's landscapes given that all land outside of the Borough's urban areas is Green Belt.
- 11.13 In this respect the 2040 Local Plan should include/retain policies for the control of development in the Green Belt and design policies should have regard to landscape character. In the event that further Green Belt release occur due to pressures from population growth, the 2040 Local Plan will need to ensure that any such areas are located sustainably, in areas of least environmental quality and plan for the transition between the urban area and adjacent landscape and its setting.
- 11.14 Based on the above, Table 11-1 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 11-1: Issues/Problems for Landscape/Townscape

Issue/Problem	Source	How Local Plan can Address Issue	Relationship to Other PPPs
Demand for housing leads to densification of urban areas. Protection of most valued landscapes/ townscapes.	Baseline Information	2040 Local Plan should include/retain policies for high quality design in urban and non-urban areas.	<p>European Landscape Convention - landscape to be integrated into regional and town planning policies.</p> <p>A Green Future - Safeguarding and enhancing the beauty of our natural scenery and improving its environmental value.</p> <p>NPPF - The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve; recognising the intrinsic character and beauty of the countryside...</p> <p>Runnymede Corporate Business Plan - To proactively seek opportunities for regeneration in the</p>

			Borough to assist with place shaping and the enhancement of the built environment.
Permitted development of employment uses to residential changes character and function of urban areas.	Baseline Information	2040 Local Plan could consider identifying and planning for areas of change.	<p>NPPF - The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.</p> <p>Runnymede Corporate Business Plan - To proactively seek opportunities for regeneration in the Borough to assist with place shaping and the enhancement of the built environment.</p>
Demand for housing places pressure on Green Belt and wider landscape.	Baseline Information	Should the 2040 Local Plan release Green Belt for development, allocations will need to be sustainably located, on areas of least environmental quality and have regard for the transition between the urban area and wider landscape.	<p>European Landscape Convention - landscape to be integrated into regional and town planning policies.</p> <p>A Green Future - Safeguarding and enhancing the beauty of our natural scenery and improving its environmental value.</p>

12. Baseline Information – Economy & Employment

- 12.1 Accessibility to London and Heathrow by rail and motorway makes Runnymede a highly desirable business location. The Borough has a strong local economic base with many commercial enterprises in the town centres, industrial estates and business parks.
- 12.2 The Runnymede economy is buoyant. The claimant count in January 2022 was 2.5%, which is lower than the South East (3.4%) and England as a whole (4.4%)⁴⁵. The percentage of the population of a working age (16-64) as at 2020 is 65.4%, a slight increase compared to 65.2% in 2014 but the general trend is declining from a high of 66.7% in 2007. The working age population is however higher than the South East (60.4%) and Great Britain (61.7%)⁴⁶.
- 12.3 The proportion of economically active persons in employment in Runnymede in 2021 was 78.8%, higher than the South East (77.9%) and Great Britain (74.6%)⁴⁵. However, this was a fall from a high of 83.8% in 2020, which may indicate impacts on the employment sector from the Covid-19 pandemic. The number of economically inactive was 16.3%, lower than the South East (18.9%) and Great Britain (21.5%). This is an increase from 14.9% in 2020 which again may be as a result of the Covid-19 pandemic.
- 12.4 The predominant occupations of Runnymede residents in 2021 were 'Managers, Directors & Senior Officials' (25.3%) and 'Professional Occupations' (23.7%). The largest employment sectors in the Borough by employee jobs were Human Health & Social Work (13.8%), Education (12.1%), Professional, Scientific and Technical Activities (12.1%) and Information & Communication (12.1%)⁴⁵. Earnings by place of work was £802 per week for Runnymede in 2021, which is substantially higher than the South East (£635) and Great Britain (£613). Runnymede also has a higher jobs density than the Greta Britain and the South East. There were 4,455 active enterprises within the borough in 2021, compared to 3,855 in 2014, a positive trend.
- 12.5 The introduction of permitted development of offices and other employment uses to residential has seen a number of office sites in the Borough converted to residential units, although these have been limited in the designated employment areas suggesting that these areas remain attractive to business.
- 12.6 The main retail centres in Runnymede are Addlestone, Chertsey & Egham. As at January 2022, retail vacancy rates in the Borough's centres was mixed. Table 12-1 sets out vacancy rates in each of the Borough's town centres since 2017 and how this compares to the South East and Great Britain as a whole. Table 12-1 shows that retail vacancy rates in Addlestone have fallen since 2017, Chertsey has seen no change but in Egham vacancy has risen sharply before improving in 2022, albeit that vacancy is still higher than in 2017. The vacancy rates in Chertsey and Egham are higher than the south east but lower than Great Britain.
- 12.7 Overall new retail openings accounted for 10,102sqm between 2017-2022 with closures accounting for 15,155sqm. Persistent vacancy (vacant for 3 or more years) is highest in Egham at (2.9%), followed by Chertsey (1.6%) and Addlestone (0.8%), but all are lower than Great Britain at 4.5%.

⁴⁵ ONS. Available at:

<https://www.ons.gov.uk/employmentandlabourmarket/peoplenotinwork/unemployment/datasets/claimantcountbyunitaryandlocalauthorityexperimental>

⁴⁶ NOMIS. Available at: <https://www.nomisweb.co.uk/>

Table 12-1: Retail Vacancy Rates in Addlestone, Chertsey & Egham 2017-2022

Location	Year						Trend
	2017	2018	2019	2020	2021	2022	
Addlestone	12.7%	19.2%	7.9%	7.6%	10.8%	7.9%	✓
Chertsey	11.8%	10.4%	7.7%	9.8%	10.3%	11.8%	-
Egham	4.5%	14.9%	16.1%	12.7%	18.8%	14.7%	✗
South East	9.5%	9.3%	9.3%	9.2%	10.4%	10.5%	
GB	12.1%	12.3%	12.7%	13.3%	15.0%	15.7%	

12.8 58.3% of the population of Runnymede are qualified to NVQ4 and above. This compares with 45.1% for the south east and 43.1% for Great Britain⁴⁵.

12.9 Tourism is an important part of the local economy. The main attractions include Thorpe Park, the River Thames, the Runnymede meadows and Coopers Hill slopes (site of the Magna Carta memorial, the John F. Kennedy memorial and the Royal Air Forces Memorial), Wentworth Golf Club, Virginia Water Lake, Savill Gardens and Windsor Great Park, Thorpe Church, the site of Chertsey Abbey and St. Ann's Hill.

Future Baseline

12.10 Whilst there is some uncertainty as to how fast the economy will recover following the Covid-19 pandemic, it is likely, in the absence of the plan that over the medium to longer term the local economy will continue to grow, given the Borough's accessibility to London and Heathrow, working age population profile and high level of qualifications, continuing to make the Borough a desirable business location. As such, it is likely that the Borough's population will continue to be highly qualified and have access to high earnings with low rates of unemployment compared to other areas.

12.11 Nevertheless, the 2040 Local Plan should include/retain policies to continue Runnymede's economic success, ensure sufficient opportunities exist for employment land/floorspace come forward to meet demand and attract inward investment. This may however place pressure on the Green Belt and the 2040 Local Plan will need to balance these competing interests depending on the level of demand/supply of employment land/floorspace.

12.12 The conversion of offices/employment uses to residential under permitted development is likely to continue in the future and the 2040 Local Plan will need to consider the implications of this on employment land and floorspace supply/demand and whether further protection of the Borough's most important employment areas is required.

12.13 Whilst retail vacancy rates in Egham, and to some degree Chertsey are high, the Borough's town centres will continue to play a role in meeting people's day to day needs. In the absence of the plan, the regeneration of Egham through delivery of the Egham Gateway West & East sites in the 2030 Local Plan should help to improve and consolidate its retail function, vitality and viability and improve vacancy rates.

12.14 The 2040 Local Plan will need to include/retain policies to ensure the continued vitality and viability of the Borough's town centres and consider whether further opportunities to consolidate their place in the retail hierarchy and improve attractiveness exist.

12.15 The Borough will continue to be an attractive tourist location through its heritage assets and attractions such as Thorpe Park. The 2040 Local Plan should include/retain policies to ensure this continues and could seek opportunities to enhance the tourism offer of the Borough.

12.16 Based on the above, Table 12-2 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 2-12: Issues/Problems for Economy & Employment

Issue/Problem	Source	How Local Plan can Address Issue	Relationship to Other PPPs
Runnymede continues to be an area of high economic performance.	Baseline Information	The 2040 Local Plan should include/retain policies which maintain Runnymede's economic performance but will need to balance against travel demand.	<p>NPPF - make sufficient provision for: employment, retail, leisure and other commercial development. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.</p> <p>Runnymede Economic Strategy - Business relocation, expansion and investment in the Borough – Better infrastructure for growth – deliverables include: - Transport initiatives</p>
Depending on need, demand for employment land/floorspace may place pressure on the Green Belt.	Baseline Information	The 2040 Local Plan will need to balance competing demands and ensure that if any Green Belt is released this is sustainably located, accessible by sustainable travel, sited on land of least environmental quality and have regard for the transition between the urban area and wider landscape.	NPPF - make sufficient provision for: employment, retail, leisure and other commercial development.
Employment floorspace losses continue through permitted development.	Baseline Information	The 2040 Local Plan will need to consider the impact of employment floorspace loss under permitted development on employment supply/demand. Policies for the protection of the Boroughs most important employments should be retained/enhanced.	<p>NPPF - set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.</p> <p>Surrey's 2050 Future Place Ambition - Safeguard our valuable economic assets, particularly employment land and premises within town centres and</p>

			close to sustainable modes of transport.
Viability/Vitality of the Borough's Town Centres	Baseline Information	The 2040 Local Plan should include/retain policies which consolidate the vitality/viability of Town Centres and could seek further opportunities to improve attractiveness.	<p>Revive & Renew - Town centres and Housing Supply – reimagined and fit for the future.</p> <p>Surrey's 2050 Future Place Ambition - Promote high street revitalisation through diversification and encouraging the development of multi-functional space and the co-location of different services.</p> <p>Runnymede Economic Strategy - Town centre regeneration and management.</p>
Tourism offer of the Borough.	Baseline Information	Policies should be included/retained which maintain/enhance the Borough's tourism offer.	None

13. Baseline Information - Transport

- 13.1 Government policies and strategies recognise the need to reduce travel demand and to encourage other forms of transport including active (walking and cycling) and sustainable (public transport).
- 13.2 Travel to work data from the 2011 Census shows that by far the most popular mode of transport is the private car (64%) with active/sustainable travel including walking and cycling, contributing around 23% of Runnymede resident's travel to work patterns. The percentage of Runnymede residents using a car or van to travel to work is higher than the South East (61%) or England average (57%).
- 13.3 Data from 2020⁴⁷ shows that dependence on the car for travel to work has increased to 67.5% and although bus patronage has risen slightly, the percentage of residents walking, cycling or using the train has decreased. A comparison of travel to work by mode between 2011 Census and the 2020 data is shown in Table 13-1.

Table 13-1: Travel to Work by Mode of Transport

Method*	2011 (%)	2020 (%)	Trend
Work from home	6.1%	9.80%	✓
Train/Underground/Metro	8.95%	6.44%	✗
Bus/Minibus	1.86%	2.70%	✓
Car/Van	64.47%	67.47%	✗
Passenger in Car/Van	3.82%	3.33%	✗
Bicycle	2.91%	2.25%	✗
Walking	9.85%	6.63%	✗

* Does not include motorcycle/taxi/other forms of transport so % do not add to 100.

- 13.4 Unsurprisingly car ownership in Runnymede is high with 1.47 cars per household which is higher than the south east (1.35) and England (1.16) average. Only 14.7% of households in Runnymede are without a car or van compared to 18.6% in the south east and 25.8% in England as a whole.
- 13.5 The highway network in Runnymede is formed from the Strategic Road Network (SRN) comprising the M3, M25 motorways and part of the A30 and operated by National Highways (formerly Highway England) and the Local Road Network (LRN) operated by the Local Highways Authority (LHA), which in this case is Surrey County Council. Both the strategic and local road networks in Runnymede suffer from congestion in certain areas, especially at peak times.
- 13.6 Census data from 2011 shows that the majority of Runnymede residents work within the local authority areas of Elmbridge (9%), Spelthorne (7%) & Woking (6%) in Surrey and London Borough's of Hillingdon (5%) and Hounslow (5%), as well as Runnymede itself (34%). This indicates that 66% of journeys to work are within around 10km of the Borough.
- 13.7 There are six rail stations situated within the Borough at Addlestone, Byfleet & New Haw, Chertsey, Egham, Longcross and Virginia Water. Addlestone, Chertsey, Egham, Longcross and Virginia Water are all suburban branch lines connecting Reading & Weybridge to London Waterloo and Byfleet & New Haw is served by the South West

⁴⁷ ONS. Available at:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/methodoftraveltowork>

Mainline connecting the south coast to London Waterloo. All stations are served by services in peak hours and in the early morning/late night.

- 13.8 The Borough is served by reasonably good bus links to the wider area such as Addlestone/Chertsey/Egham/Woodham/New Haw to Staines upon Thames, Woking and Egham/Englefield Green to Windsor and Heathrow. Some areas of the Borough such as Virginia Water and Thorpe are only served by infrequent bus services.
- 13.9 Whilst not within the Borough of Runnymede, Heathrow Airport lies approximately 4km to the north east and is a major international hub airport for commercial passenger journeys and freight. Fairoaks Airfield to the south of Ottershaw is a local airfield used for private flights and flight training.

Future Baseline

- 13.10 The transport evidence which supported the 2030 Local Plan⁴⁸ showed that the growth set out in the 2030 Local Plan, caused issues to arise on the A320, especially around St Peter's Hospital and Junction 11 of the M25. Other local routes where hotspots were identified include the A30, A308 (The Causeway), A317 (St Peters Way), A318 (Brighton Road) and B386 (Longcross Road). However, much of the local highway network appears to operate within capacity.
- 13.11 Improvements to the A320 are planned with £44m of funding secured and works are expected to be completed by 2024. As such, even in the absence of the plan, improvements to the local road network and junction 11 of the M25 will come forward, which should maintain vehicle flows on the A320 from Woking to Junction 11 of the M25. However, congestion hot spots at certain junctions and links will remain on the local road network if funding for further highway improvement is not secured, as set out in the Council's Infrastructure Delivery Plan (IDP) Schedules⁴⁹. The Council has now implemented the Community Infrastructure Levy (CIL) which may aid in bringing projects forward.
- 13.12 The 2040 Local Plan will need to ensure continued support for highway projects which improve traffic flow at identified hotspots through updates to the IDP and including/retaining policies for infrastructure delivery.
- 13.13 The high levels of car ownership in Runnymede are likely to continue into the future and as such the car will still remain the main mode of transport for Runnymede residents. Since the 2011 Census the percentage of those travelling to work by car increased with a subsequent decrease in those travelling by train, walking and cycling, although the numbers working from home increased. Data on travel to work by mode of transport has yet to be released, since the Covid-19 pandemic. The pandemic may have altered some peoples working patterns, although there was already an upward trend towards working from home, prior to the pandemic, and this is likely to continue in the future. The falling trend of those walking/cycling may have improved or reversed since the Covid-19 pandemic, but this is uncertain and any changes to travel modes could be temporary in nature.
- 13.14 Given this background, the 2040 Local Plan should support strategies and projects which aim to improve the connectivity and attractiveness of active and sustainable transport infrastructure in Runnymede. This is especially the case where improvements which connect Runnymede to other areas are proposed, given that the majority of

⁴⁸ A320 Corridor Study (Arcadis) 2018 & Strategic Highway Assessment Report (SCC) 2017. Available at: <https://www.runnymede.gov.uk/planning-policy/planning-policy-evidence-based-documents/14>

⁴⁹ Runnymede IDP Schedules (RBC) 2018. Available at: <https://www.runnymede.gov.uk/planning-policy/planning-policy-evidence-based-documents/14>

travel to work journeys (66%) are made within 10km of Runnymede and 34% within Runnymede itself and attractive active/sustainable transport choices could replace shorter journeys by car. Further, the 2040 Local Plan will need to ensure it delivers sustainable patterns of development to maximise opportunities sustainable travel choices.

- 13.15 Rail patronage appears to have fallen since 2011, and it is uncertain whether this trend will continue or whether rail patronage will increase over time. In any event capacity improvements to the rail network and stations are largely beyond the scope of the Local Plan, although support for schemes which improve rail capacity should be supported subject to local impacts.
- 13.16 Even in the absence of the plan, a third runway at Heathrow Airport may be delivered, significantly increasing the number of air passenger and freight flights with potential for increasing vehicle trips on the local and strategic road networks. However, until such time as further detail is revealed through the consenting process, the impact of a third runway on traffic impacts is uncertain. Whether a third runway is delivered or not, a new southern rail access to the airport has been proposed which may have implications for rail travel in Runnymede. However, the impacts to transport in Runnymede and more wider environmental impacts are uncertain at this stage and will depend on whether the scheme comes forward and its final route.
- 13.17 Based on the above, Table 13-2 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 13-2: Issues/Problems for Transport

Issue/Problem	Source	How Local Plan can Address Issue	Relationship to Other PPPs
Continued prevalence of journeys made by car and high levels of car ownership.	Baseline Information	The 2040 Local Plan should include/retain policies giving support for highway improvement schemes through an updated IDP as well as schemes/projects which aim to improve the attractiveness and connectivity of active/sustainable transport infrastructure. The 2040 Local Plan should also deliver sustainable patterns of development to maximise sustainable travel choices and reduce travel demand.	<p>Gear Change – Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030. Ensure active travel is embedded in wider policy making.</p> <p>Decarbonising Transport - We will deliver a world class cycling and walking network in England by 2040.</p> <p>NPPF – Significant development should be focused on locations which are or can be made sustainable.</p> <p>Revive & Renew - New Transport & Smart Mobility – Covid19-safe, sustainable,</p>

			<p>delivering good connectivity.</p> <p>Transport Strategy for the South East - Integrated approach to land use and transport planning; A network that promotes active travel; Reduce congestion and encourage further shifts to public transport; A reduction in the need to travel, particularly by private car.</p> <p>Surrey's 2050 Place Ambition - Improve connectivity both within Surrey and between strategically important hubs.</p> <p>Draft Surrey Local Transport Plan 4 - Ensure that new development is focussed around sustainable travel options.</p>
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14. Baseline Information – Waste

- 14.1 Runnymede Borough Council is the waste collection authority in Runnymede, whilst Surrey County Council is the waste disposal authority. The Borough Council only collects waste from households and does not collect any commercial, industrial or hazardous waste.
- 14.2 Government statistics⁵⁰ show that total waste collected in Runnymede in 2020/21 was 32,332 tonnes which compares to 29,042 tonnes in 2014/15 an increase of 3,290 tonnes per annum and a negative trend. However, Runnymede had the highest percentage increase in waste recycling in 2020/21 in England, with rates increasing from 43.8% in 2019/2020 to 49% in 2020/21, a 5.2% increase and positive trend. This compares to 46.1% for the south east and 42.3% for England.
- 14.3 The Surrey Waste Local Plan 2020⁵¹ allocates a site at Trumps Farm, Longcross for a Household Waste Materials Recycling Facility (MRF) for up to 50,000 tonnes per annum.

Future Baseline

- 14.4 The Surrey Waste Plan estimates that waste arisings from Local Authority Collected Waste across Surrey will increase in the period 2017-2035 by 30,000 tonnes. Coupled with this, the increase in population is likely to see levels of waste collected from Runnymede continue to increase into the future, even in the absence of the Plan.
- 14.5 The increase in recycling rates could continue into the future, given that recycling targets at a national level and within the Surrey Waste Plan are currently higher than the 49% recorded for Runnymede in 2020/21.
- 14.6 Whilst waste planning is largely beyond the scope of the Local Plan, given the trend of increasing waste arisings and that higher rates of recycling will be required to hit targets, the 2040 Local Plan should include/retain policies which ensure that sufficient space for waste storage is delivered.
- 14.7 Based on the above, Table 14-1 sets out issues/problems, how the Local Plan can address these, if at all, and the relationship to the objectives of other relevant plans, policies and programmes.

Table 14-1: Issues/Problems for Waste

Issue/Problem	Source	How Local Plan can Address Issue	Relationship to Other PPPs
Waste levels continue to increase.	Baseline Information	2040 Local Plan should include/retain policies which deliver waste storage within development proposals.	National Planning Policy for Waste - ensuring the design and layout of new residential and commercial development and other infrastructure complements sustainable waste management, including

⁵⁰ Gov.uk. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>

⁵¹ Surrey Waste Local Plan (SCC) 2020. Available at: <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/waste-plan>

			the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.
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15. Sustainability Framework

- 15.1 The sustainability framework is a decision aiding tool to ensure the consistent appraisal of Local Plan policy options, policies, allocations and other elements which make up the plan. The framework sets out a series of sustainability objectives and decision aiding criteria, to determine the sustainability and likely environmental impacts of the plan on the environment. The objectives and criteria in the sustainability framework are based on the review of the relevant plans, policies and programmes, baseline information and issues/problems identified.
- 15.2 Table 15-1 includes a set of SA/SEA objectives and associated decision aiding criteria, derived from the objectives and criteria of the SA Framework adopted for the 2030 Local Plan. This is in order to maintain continuity with previous SA assessments.
- 15.3 It is considered that the objectives and decision-making criteria adopted for the 2030 Local Plan remain just as relevant for appraising the 2040 Local Plan. However, some of the objectives and criteria have been refined as a result of other plans/policies/programmes and baseline information.

Table 15-1: Proposed SA Framework

SA Objectives	Decision Aiding Criteria
<p>SA Objective 1: To conserve and enhance biodiversity, habitats and species and ecosystem services, including green & blue infrastructure</p>	<p>Will it avoid potential impacts of development on designated sites?</p> <p>Will it avoid net loss of and achieve enhancement of ecological resources and services?</p> <p>Will it avoid habitat fragmentation?</p> <p>Will it lead to development which incorporates or enhances biodiversity, green and blue infrastructure and its connectivity? into the design e.g. linking green corridors, incorporation of habitats etc.?</p> <p>Will it help achieve delivery of Local Nature Recovery Strategies and enhancement of Biodiversity Opportunity Areas/Priority Habitat?</p>
<p>SA Objective 2: to protect and improve the health and well-being of the population and reduce inequalities in health</p>	<p>Will it help to address pockets of deprivation and child poverty?</p> <p>Will it improve access to healthcare?</p> <p>Will it provide for the needs of an ageing population and those with specialist needs?</p> <p>Will it facilitate opportunities to achieve active lifestyles and prevent obesity?</p>

	<p>Will it improve opportunities to access green & blue infrastructure, outdoor/indoor sports, leisure and recreation?</p> <p>Will it protect and enhance community facilities and services?</p> <p>Will it improve opportunities to access community facilities and services?</p> <p>Will it support local sustainable food production, including the provision of allotments and community gardening?</p>
SA Objective 3: to protect soil and minerals resources	<p>Will it ensure that mineral resources are not sterilised?</p> <p>Will it avoid environmental effects from mineral abstraction on sensitive receptors?</p> <p>Will it make the most effective use of land and achieve efficiency in land use and avoid the development of greenfield land over the redevelopment of previously developed land and buildings?</p> <p>Will it provide opportunities for remediating/mitigating despoiled, degraded, derelict, contaminated and unstable land?</p> <p>Will it avoid the loss of the most valuable agricultural land?</p> <p>Will it minimise waste arisings and facilitate recycling?</p>
SA Objective 4: to improve water quality and efficiency?	<p>Will it ensure developments are water efficient and include opportunities for water recycling?</p> <p>Will it help to improve water quality?</p>
SA Objective 5: to increase resilience to climate change, including flood risk	<p>Will it ensure that people, property and businesses are protected from flooding?</p> <p>Will development incorporate SUDS?</p> <p>Will it lead to developments which are designed to be resilient to hotter, drier summers and warmer, wetter winters?</p>
SA Objective 6: to reduce air and noise pollution	<p>Will it ensure that development minimises exposure to poor air quality</p>

	<p>and noise pollution and does not add to air/noise pollution in the wider area?</p> <p>Will it avoid contributing to congestion and reduce travel demand?</p> <p>Will it facilitate the incorporation of electric vehicle charging points into new developments or ensuring they can be retrofitted?</p>
SA Objective 7: reduce greenhouse gas emissions	<p>Will it ensure that new developments are designed to achieve high levels of energy efficiency?</p> <p>Will it prioritise access to and improve connectivity by good public transport and safe/attractive walking and cycling facilities infrastructure (including segregated cycle lanes), over facilities for private cars?</p> <p>Will it help to achieve walkable neighbourhoods?</p> <p>Will it increase renewable/low carbon energy generation?</p> <p>Will it provide opportunities to reduce carbon emissions and provide carbon capture/sinks?</p>
SA Objective 8: to sustain economic growth and competitiveness across the Borough	<p>Will it support a dynamic and diverse economy?</p> <p>Will it stimulate economic growth in deprived areas?</p> <p>Will it support low environmental impact business sectors?</p> <p>Will it contribute to the provision of opportunities for employment and improvements in educational attainment and skills development?</p> <p>Will it maintain and enhance the vitality/viability and retail function of the Borough's town and local centres?</p> <p>Will it support the Borough's tourist attractions?</p>
SA Objective 9: to ensure the provision of high quality, sustainable constructed and affordable homes and necessary community infrastructure	<p>Will it provide viable and deliverable good quality and affordable housing to meet identified needs?</p>

	<p>Will it ensure the protection, enhancement or delivery of necessary community infrastructure?</p> <p>Will it protect, enhance or provide delivery of infrastructure services and facilities?</p> <p>Will it achieve development that demonstrates sustainable design and construction including efficient use of materials?</p>
<p>SA Objective 10: to protect and enhance the Borough's historic and cultural assets</p>	<p>Will it ensure that development avoids adverse effects on heritage assets, archaeology and Conservation Areas?</p> <p>Will it enhance and promote the Borough's heritage assets and their setting?</p> <p>Will it protect or enhance the Borough's cultural facilities/services?</p> <p>Will it improve access to the Borough's cultural facilities/services?</p> <p>Will it ensure that development is well-designed and is well-related to the surrounding townscape?</p>
<p>SA Objective 11: to protect and enhance open space and the landscape/townscape character of the Borough</p>	<p>Will it protect and enhance landscape character?</p> <p>Will it ensure that development is of high quality and inclusive design and is well-related to the surrounding townscape?</p> <p>Will it ensure the quality of and provision of suitable open space, where need is identified?</p>

16. Next Steps

- 16.1 The draft scoping report will now be subject to public consultation. If consultees suggest changes to the scope of the assessment these changes will be considered by the Council before issuing a final Scoping Report.
- 16.2 The next stage of the SA will be assessment at the Issues and Options stage (Regulation 18) and this will begin later in 2022. It is intended that an Issues and Options paper will be prepared and therefore following the completion of the SA at this stage, the SA Report and the Issues and Options paper will be published for consultation.

Monitoring

- 16.3 A framework for monitoring the significant effects of the 2040 Local Plan will be proposed in the SA/SEA at Issues & Options stage. The framework will be clearly linked to the objectives in the SA/SEA framework and be directly linked to significant effects.

Appendix A

Review of Plans, Policies & Programs Relevant to the 2040 Local Plan

Plan or Programme	Objectives, Targets or Key Message
Biodiversity (including Fauna & Flora) & Green/Blue Infrastructure	
<p>Summary of the Local Plan's (LP) relationship to biodiversity: The review of the Local Plan should, as far as it is able to do so, retain/strengthen or include policies/actions to aid in the protection and enhancement of biodiversity by minimising risks to habitat condition, fragmentation and loss as a result of development. The Local Plan should seek to provide net gains in biodiversity, retain and enhance priority habitats, support biodiversity opportunity areas (BOAs), contribute to resilient ecological networks as well as supporting and aiding delivery of Nature Recovery Strategies. The Local Plan should also seek to protect, enhance and provide a coherent green/blue infrastructure network and connectivity. A Habitat Regulations Assessment (HRA) will need to be undertaken.</p> <p>The SA should include objectives that addresses protection and enhancement of biodiversity, habitats, green/blue infrastructure and consideration of ecosystem services and ecological networks as well as biodiversity net gains. The SA should carefully consider the location of potential allocations and consider other policy effects which could impact upon biodiversity and the green/blue infrastructure network.</p>	
Strategic Plan for Biodiversity 2011-2020 (United Nations) 2010	<p>Sets out a vision that 'By 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people'</p> <p>The Strategic Plan has 5 strategic goals: A: Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society; B: Reduce the direct pressures on biodiversity and promote sustainable use; C: Improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity; D: Enhance the benefits to all from biodiversity and ecosystem services; E: Enhance implementation through participatory planning, knowledge management and capacity building</p>
A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018	Policies will focus on...Recovering nature and enhancing the beauty of landscapes.

Plan or Programme	Objectives, Targets or Key Message
	<p>Achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife. On land and in freshwaters, we will do this by:</p> <ul style="list-style-type: none"> - Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term. - Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits. - Taking action to recover threatened, iconic or economically important species of animals, plants and fungi, and where possible to prevent human induced extinction or loss of known threatened species in England and the Overseas Territories. - Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042. <p>Actions we will take include:</p> <ul style="list-style-type: none"> - Making sure that existing requirements for net gain for biodiversity in national planning policy are strengthened <p>Environmental protections already enshrined in national planning policy will be maintained and strengthened.</p> <p>New development will happen in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage. We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land.</p>
Biodiversity 2020: A strategy for England's wildlife and ecosystem services (DEFRA) 2011	Halt overall loss of England's biodiversity by 2020; support healthy well-functioning ecosystems and establish coherent ecological networks.
The Conservation of Habitats and Species Regulations 2017	Regulation 63 requires Appropriate Assessment of plans and projects likely to have a significant effect on a National Site Network site.

Plan or Programme	Objectives, Targets or Key Message
Environment Act 2021	Sets out a requirement for Biodiversity Net Gain and a requirement to prepare Local Nature Recovery Strategies.
Wildlife & Countryside Act 1981	Prohibits taking, injuring, killing and disturbing wildlife. It is also an offence to disturb places used for shelter and protection.
Natural Environment & Rural Communities Act 2006	<p>Section 40(1) Every public authority must in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.</p> <p>Section 40(3) Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.</p>
National Planning Policy Framework (NPPF) 2021	<p>Para 20 - Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for... conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.</p> <p>Para 99 - Existing open space, sports and recreational buildings and land, including playing fields, should not be built on (save in certain circumstances).</p> <p>Para 174 - Planning policies and decisions should contribute to and enhance the natural and local environment by...protecting and enhancing valued landscapes, sites of biodiversity... wider benefits from natural capital and ecosystem services... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.</p> <p>Para 175 - Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</p> <p>Para 179 - To protect and enhance biodiversity and geodiversity, plans should:</p> <p>b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</p>
Planning Practice Guidance (PPG) Natural Environment 2019	Plans, and particularly those containing strategic policies, can be used to set out a suitable approach to both biodiversity and wider environmental net gain, how it will be achieved, and which areas present the best opportunities to deliver gains.
The State of Natural Capital: Restoring our Natural Assets 2014	<p>The report identifies that:</p> <p>some assets are currently not being used sustainably and the benefits that we derive from them are at risk;</p> <p>there are major economic benefits to be gained from natural capital and that their value should be incorporated into decision-making;</p> <p>and</p> <p>a long-term restoration plan is necessary to maintain and improve natural capital for future generations.</p>
South East Plan 2009	Policy NRM6 - Specific policy dealing with the Thames Basin Heaths SPA which sets out the principles of avoidance measures and exclusion zones.
Thames Basin Heaths Delivery Framework 2009	<p>Objectives of the Framework are to recommend: -</p> <p>A consistent approach to the protection of the SPA from the significant effects of residential;</p> <p>The type and extent of residential development that may have a significant effect either alone or in combination on the SPA;</p> <p>Key criteria for the delivery of avoidance measures</p>

Plan or Programme	Objectives, Targets or Key Message
The State of Surrey's Nature (Surrey Nature Partnership) 2017	For the entire species sample of 4,242 species: 11.5% locally extinct. 4% threatened 3% near threatened 14% declining
Surrey's 2050 Place Ambition v2 draft (Surrey Future) 2021	Priority - Invest in natural capital and deliver nature recovery Organisations such as Surrey County Council, Surrey Wildlife Trust and district and borough councils will continue to work together to avoid adverse effects on the environment, improve resilience to climate change and invest in natural capital by: <ul style="list-style-type: none"> - Recognising the importance of natural capital and the role of ecosystem services and pursuing opportunities for improving biodiversity and the air and water environment alongside new development. - Creating a coherent connected network of accessible multi-functional greenspaces. - Providing Suitable Alternative Natural Greenspace to mitigate the impacts of new housing development on the SPAs which also delivers new accessible and good quality green infrastructure.
Population & Human Health	
<p>Summary of the Local Plan's (LP) relationship to population & human health</p> <p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions to prioritise health & well-being, through encouraging and/or creating opportunities for physical exercise for all abilities, creating healthier choices, provision of affordable housing and housing for different groups of the population and by providing a good quality built environment and well-designed communities which are safe and accessible by walking, cycling and public transport.</p> <p>The SA framework should include objectives addressing the need to protect human health and promote well-being. The potential effects of the Local Plan on health may include opportunities for access to better health care services, access to good quality affordable housing and housing for specific groups, opportunities for physical/mental well-being through exercise and/or informal/formal recreation</p>	

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opportunities, food production/consumption choices as well as safe and connected communities accessible by active travel such as walking/cycling.	
Sustainable Development Goals (UN)	Goal 3 Good Health & Well-being - Ensuring healthy lives and promoting the well-being for all at all ages is essential to sustainable development.
Build Back Better (UK Government) 2021	<p>Plan for healthcare involves i) tackling the electives backlog, ii) putting the NHS back on a sustainable footing and iii) increasing the focus on prevention.</p> <p>While the Government's immediate priorities for the NHS must be dealing with COVID-19 and recovering the elective backlog, its long-term priority remains shifting the NHS toward prevention. Prevention must be a central principle in delivering a sustainable NHS and levelling up. This means fixing the underlying causes of ill-health that are contributing to health spending increases and worsening outcomes. Improving the health of communities is vital to resilience against future health threats.</p>
NHS Long Term Plan	<p>Local NHS organisations will increasingly focus on population health and local partnerships with local authority-funded services, through new Integrated Care Systems (ICSs) everywhere.</p> <p>New integrated care systems (ICSs) will help deliver programmes as the NHS continues to move from reactive care towards a model embodying active population health management. ICSs – including the devolved health and care systems in Greater Manchester and Surrey Heartlands – will also provide stronger foundations for working with local government and voluntary sector partners on the broader agenda of prevention and health inequalities.</p>
Beating Crime Plan (UK Government) 2021	We will design crime and disorder out of areas by setting national security standards on building and area design nationally. We have embedded security standards and crime prevention principles within the National Model Design Code and are developing minimum standards as part of the review of the Housing, Health & Safety Rating System to ensure domestic security is not just a privilege to some. The Social Housing White Paper also announced

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	<p>a review of the Decent Homes Standard. As part of that review, we want to explore how we can go further in using the Decent Homes Standard to keep social housing residents secure and help tackle anti-social behaviour.</p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018</p>	<p>We will:</p> <p>Help people improve their health and wellbeing by using green spaces including through mental health services.</p> <p>'Green' our towns and cities by creating green infrastructure and planting one million urban trees.</p>
<p>National Planning Policy framework (NPPF) 2021</p>	<p>Para 20 - Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:</p> <p>housing (including affordable housing), employment, retail, leisure and other commercial development...</p> <p>community facilities (such as health, education and cultural infrastructure);</p> <p>Para 92 - Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</p> <p>Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other;</p> <p>Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.</p> <p>Para 93 - To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <p>Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</p>

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	<p>take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.</p> <p>Para 97 - Planning policies and decisions should promote public safety and take into account wider security and defence requirements...</p> <p>Para 98 - Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities...</p>
<p>Planning Policy for Traveller Sites (PPTS) 2015</p>	<p>Para 3 - Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.</p> <p>Para 9 - Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area.</p> <p>Para 13 - Sets out a range of criteria to take into account when setting policies for travellers including promoting peaceful and integrated co-existence, promote access to health and education and consider the effect of the local environment on health, avoid placing pressure on infrastructure and avoid areas of flood risk.</p>
<p>Planning Practice Guidance (PPG): Healthy & Safe Communities 2019</p>	<p>Planning Practice Guidance</p> <p>Para 001 - Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).</p> <p>Para 004 - Local planning authorities can have a role by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.</p>

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	Para 009 - Planning provides an important opportunity to consider the security of the built environment, those that live and work in it and the services it provides.
Planning Practice Guidance (PPG): Housing Needs of Different Groups (2019)	Para 001 - Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies.
Joint Strategic Needs Assessment 2019	<p>The health, welfare, planning and housing authorities in Surrey need to work collectively to:</p> <p>Identify all available opportunities to increase affordable housing supply e.g. by using public land and assets to provide new schemes.</p> <p>Influence the type of housing supply (both public and private) to ensure it meets identified needs and current gaps in provision.</p>
Surrey Public Health Plan 2020-21 (SCC)	Objective - Promote healthy, inclusive and safe places through planning policies/decisions.
Surrey Health & Wellbeing Strategy (Surrey Health & Wellbeing Board) 2020	<p>Vision - By 2030 we want Surrey to be a uniquely special place where everyone has a great start to life, people live healthy and fulfilling lives, are enabled to achieve their full potential and contribute to their community, and no one is left behind.</p> <p>Our ambitions for our place are:</p> <p>Residents live in clean, safe and green communities, where people and organisations embrace their environmental responsibilities.</p> <p>Everyone has a place they can call home, with appropriate housing for all.</p> <p>Priorities include:</p> <p>Helping people in Surrey to lead healthy lives</p> <p>Empowering our citizens to lead healthier lives. This includes individual lifestyle factors, but also considers built environments and how that impacts on health. This priority area is entirely focused on prevention, and about creating healthy and proactive people who take ownership of their health.</p>

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	<p>Supporting the mental health and emotional wellbeing of people in Surrey.</p> <p>Enabling the emotional wellbeing of our citizens by focusing on preventing poor mental health and supporting those with mental health needs. Empowering people to seek out support where required to prevent further escalation of need, but this priority is also about creating communities and environments that support good mental health.</p> <p>Outcomes we're aiming to achieve:</p> <p>People are supported to live independently for as long as possible;</p> <p>Everyone lives in adequate housing;</p> <p>People have a healthy weight and are active</p>
Community Vision for Surrey in 2030 (SCC) 2018	<p>By 2030 we want Surrey to be a uniquely special place where everyone has a great start to life, people live healthy and fulfilling lives, are enabled to achieve their full potential and contribute to their community, and no one is left behind.</p> <p>We want our county's economy to be strong, vibrant and successful and Surrey to be a great place to live, work and learn. A place that capitalises on its location and natural assets, and where communities feel supported and people are able to support each other.</p> <p>Ambitions for Place:</p> <ul style="list-style-type: none"> - Residents live in clean, safe and green communities, where people and organisations embrace their environmental responsibilities. - Journeys across the county are easier, more predictable and safer. - Everyone has a place they can call home, with appropriate housing for all. - Businesses in Surrey thrive. - Well-connected communities, with effective infrastructure, that grow sustainably.

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Accommodation with Care and Support Strategy (SCC)	SCC's ambition is to commission accommodation with care and support for both adults with a learning disability and/or autism and older people that is focused on enabling independence and maximising individual choice and control.
Runnymede Housing Strategy Statement 2021-2026 (RBC)	<p>Aspiration is for sufficient and affordable, good quality housing that is accessible and suitable for local people in Runnymede.</p> <p>Aim to:</p> <p>Ensure good quality affordable housing is available to local people in both the social and private sector;</p> <p>Increase the provision of affordable housing including low cost home ownership.</p>
Land & Soil	
<p>Summary of the Local Plan's (LP) relationship to land & soil</p> <p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions which prioritise the development of brownfield land, makes the best use of land, promotes mixed use development, protects the most valuable agricultural land and seeks opportunities for remediating/mitigating despoiled, degraded, derelict, contaminated and unstable land. The Local plan could also include policies/actions for healthy food production and protection/enhancement of green/blue infrastructure.</p> <p>The SA framework should include objectives addressing the protection of soil and land.</p>	
A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018	<p>Policies will focus on:</p> <p>Using and managing land sustainably.</p> <p>Ensure that resources from nature, such as food, fish and timber, are used more sustainably and efficiently. We will do this by:</p> <p>Improving our approach to soil management: by 2030 we want all of England's soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches.</p> <p>We will:</p> <p>Improve soil health, and restore and protect peatlands</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>Environmental protections already enshrined in national planning policy will be maintained and strengthened.</p> <p>New development will happen in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage. We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land.</p>
Safeguarding our Soils: A Strategy for England (DEFRA) 2009	By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations.
Environmental Protection Act (1990)	To provide an improved system for the identification of land that is posing unacceptable risks to health or the environment and for securing remediation where necessary.
National Planning policy Framework (NPPF) 2021	<p>Para 119 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.</p> <p>Para 120 - Planning policies and decisions should:</p> <ul style="list-style-type: none"> a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains... b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production; c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; <p>Para 124 - Planning policies and decisions should support development that makes efficient use of land...</p>

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	<p>Para 174 - Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil pollution or land instability. f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
Planning Practice Guidance (PPG): Natural Environment 2019	Para 001 - Planning policies and decisions should take account of the economic and other benefits of the best and most versatile agricultural land.
Water	
<p>Summary of the Local Plan's (LP) relationship to water</p> <p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions relating to sustainable use of water/water efficiency as well as protecting and aiding opportunities to improve water quality. The Local Plan should also seek to minimise the risks from and to development by avoiding inappropriate development in areas of flood risk as well as pursue sustainable drainage and minimise run-off. Protection and enhancement of blue infrastructure assets/connections should also be included including flood protection measures where possible.</p> <p>The SA should include objectives that promote the protection and enhancement of the water environment & blue infrastructure including reducing flood risk from all sources, water quality and efficiency.</p>	
The Water Environment Regulations 2017	Regulations for protecting and improving the water environment including key objectives for water bodies, the deadlines by which they must be achieved and the exemptions which may be relied on.
A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018	<p>25 Year Goals include achieving clean and plentiful water by:</p> <p>Improving at least three quarters of our waters to be close to their natural state as soon as is practicable by:</p> <p>Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases</p>

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	<p>from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies.</p> <p>Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans...</p>
<p>Future Water - The Government's water strategy for England (DEFRA) 2008</p>	<p>By 2030 at the latest, there is improved quality of the water environment and the ecology which it supports; sustainably managed risks from flooding; more effective management of surface water and sustainable use of water resources.</p>
<p>National Planning Policy Framework (NPPF) 2021</p>	<p>Para 174 - Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.</p>
<p>Thames River Basin District Management Plan (Environment Agency) 2015</p>	<p>One of the main purposes of the plan is to prevent water bodies deteriorating, sets out legally binding objectives for each quality element in every water body, including an objective for the water body as a whole with the default objective is good status.</p> <p>Sets out actions to improve water quality. Future aims for the River Wey include implementing Lower Wey Oxbow Restoration Project to enhance and restore the main Wey river channel and Wey Diffuse Advice Project throughout the catchment.</p>
<p>Thames Catchment Flood Management Plan (Environment Agency) 2009</p>	<p>Aim is to promote more sustainable approaches to managing flood risk. Will be delivered through a combination of different approaches. Identifies that over 5,000 properties in Runnymede at risk in a 1% annual probability river flood.</p>
<p>River Wey Catchment Abstraction Management Strategy (Environment Agency) 2019</p>	<p>Identifies the Wey having restricted 'Water available for licensing'</p>
<p>Water Resource Management Plan (Affinity Water) 2020</p>	<p>We will put in place actions to help customers reduce their water use from an average of 152 litres of water per person per day to</p>

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	129 litres by 2025. We aim to reduce water use to between 110 and 120 litres per person per day by 2045, if this is affordable for customers and delivered in a way that is acceptable to them.
Surrey Local Flood Risk Management Strategy 2017-2032 (SCC) 2017	<p>Vision</p> <p>To make Surrey more resilient to flooding on a long-term basis through a co-ordinated approach with residents and partners.</p> <p>Relevant objectives include:</p> <p>Objective 6: Planning</p> <p>We will reduce the risk of flooding to and from development through local planning policy and processes. To achieve this we will:</p> <p>Influence policy and advise Local Planning Authorities on managing flood risk</p> <p>Take viable opportunities to utilise existing and new development to reduce flood risk</p>
Air & Noise	
<p>Summary of the Local Plan's (LP) relationship to air & noise</p> <p>The Local Plan review should, as far as it is able to do so, retain, strengthen and/or implement policies/actions to maintain and/or improve air quality through minimising travel demand, promoting active/sustainable forms of travel, delivery of EV charging points and/or other innovations in development. The Local Plan should seek opportunities to improve connectivity between places so that the number of journeys by car can be reduced to ease congestion, improve noise levels and improve local air quality. The location of development including any allocations should carefully consider issues of noise nuisance both to and from development.</p> <p>The SA should include objectives relating to noise and air emissions.</p>	
Global Air Quality Guidelines (WHO) 2021	Sets out recommendations for interim targets for six air pollutants.
Environmental Noise Guidelines for the European Region (WHO) 2018	<p>Sets out recommendations for average and night time noise limits from sources such as road traffic (53db & 45db), railway (54db & 44db), aircraft (45db & 40db) and leisure noise (70db yearly average).</p> <p>Guiding principles: reduce, promote, coordinate and involve</p> <ul style="list-style-type: none"> • Reduce exposure to noise, while conserving quiet areas.

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	<ul style="list-style-type: none"> • Promote interventions to reduce exposure to noise and improve health. • Coordinate approaches to control noise sources and other environmental health risks. • Inform and involve communities potentially affected by a change in noise exposure.
Clean Air Strategy (DEFRA) 2021	<p>By implementing the policies in this Strategy, we will reduce PM2.5 concentrations across the UK, so that the number of people living in locations above the WHO guideline level of 10 µg/m³ is reduced by 50% by 2025.</p> <p>We will commit to a new target for the reduction of damaging deposition of reactive forms of nitrogen and review what longer term targets should be to further tackle the environmental impacts of air pollution.</p> <p>We will provide guidance for local authorities explaining how cumulative impacts of nitrogen deposition on natural habitats should be mitigated and assessed through the planning system.</p>
Road to Zero (HM Government) 2018	<p>Our mission is to put the UK at the forefront of the design and manufacturing of zero emission vehicles, and for all new cars and vans to be effectively zero emission by 2040. As set out in the NO₂ plan, we will end the sale of new conventional petrol and diesel cars and vans by 2040. By then, we expect the majority of new cars and vans sold to be 100% zero emission and all new cars and vans to have significant zero emission capability. By 2050 we want almost every car and van to be zero emission.</p> <p>We want to see at least 50%, and as many as 70%, of new car sales and up to 40% of new van sales being ultra low emission by 2030.</p>
The Air Quality Standards Regulations 2010	Regulations include criteria for determining how achievement with the limit values should be assessed, including consideration of locations and relevant exposure.
A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018	25 Year Goals include achieving clean air by:

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	<p>Meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030.</p> <p>Ending the sale of new conventional petrol and diesel cars and vans by 2040.</p> <p>Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework.</p>
Noise Policy Statement for England (DEFRA) 2010	<p>Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:</p> <ul style="list-style-type: none"> • avoid significant adverse impacts on health and quality of life; • mitigate and minimise adverse impacts on health and quality of life; and • where possible, contribute to the improvement of health and quality of life.
National Planning Policy Framework (NPPF) 2021	<p>Para 174 - Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.</p> <p>Para 185 - Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:</p> <ol style="list-style-type: none"> a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality

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	<p>b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;</p> <p>Para 186 - Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones... Opportunities to improve air quality or mitigate impacts should be identified</p>
Planning Practice Guidance (PPG): Air Quality 2019	Para 002 - Consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure net improvements in overall air quality where possible.
Planning Practice Guidance (PPG): Noise	Para 001 - Noise needs to be considered when development may create additional noise or would be sensitive to the prevailing acoustic environment.
Surrey Transport Plan: Air Quality Strategy (SCC) 2011	The aim of this plan is to help people meet their transport and travel needs effectively, reliably, safely and sustainably within Surrey; in order to promote economic vibrancy, protect and enhance the environment and improve the quality of life.
Air Quality Management Area Action Plan (RBC) 2014	Exceedances of the annual mean nitrogen dioxide objective continue to occur in the AQMAs. The plan includes development control measures aimed at ensuring adequate assessment of new development impacts and appropriate mitigation where adverse impacts are identified.
Climate	
<p>Summary of the Local Plan's (LP) relationship to climate</p> <p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions aimed at mitigating and adapting to climate change impacts through promotion of energy efficiency, encouraging renewable/low carbon energy and reducing carbon emissions. Local Plan policies/actions should also encompass the location of development to maximise opportunities for active/sustainable travel and reduce the need to travel as well as consider the need to minimise the risks from and to development by avoiding inappropriate development in areas of flood risk as well as pursue sustainable drainage and minimise run-off.</p> <p>The SA should include objectives assessing the need to mitigate and adapt to climate impacts including reducing carbon emissions from domestic/commercial development, water efficiency, minimising the need to travel, promoting active/sustainable travel,</p>	

Plan or Programme	Objectives, Targets or Key Message
addressing flood risk and drainage, opportunities for renewable/low carbon energy as well as protection/enhancement of green/blue infrastructure.	
Paris Agreement 2015	<p>Global action plan to avoid dangerous climate change. 195 countries agreed to a long-term goal of keeping the increase in global average temperature below 2°C above pre-industrial levels and to aim to limit any increase to 1.5°C.</p> <p>The operational details for the practical implementation of the Paris Agreement were finalised at COP26 in Glasgow in November 2021.</p>
Kyoto Protocol 2008-2012 & Doha Agreement 2013-2020	<p>The UK government agreed a legally binding targets to reduce greenhouse gas emissions by 12.5 % below the base year (1990) level over the period 2008 – 2012 (Kyoto) and by 20% below a base year of 2005 in the period 2013-2020 (Doha).</p> <p>UK met it's Kyoto targets and is on track to meet Doha targets.</p>
Climate Change Act 2008	<p>Sets the target for greenhouse gas emissions to be cut by at least 34% by 2020, and by at least 80% by 2050, below 1990 levels. The Act introduced five-year carbon budgets as a tool to achieve this target and set up the independent Committee on Climate Change. Act was amended to reach net zero greenhouse gas emissions by 2050.</p>
A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018	<p>25 Year Goals include a reduced risk of harm from environmental hazards such as flooding and drought by... Making sure that decisions on land use, including development, reflect the level of current and future flood risk.</p> <p>We will take all possible action to mitigate climate change, while adapting to reduce its impact. We will do this by:</p> <p>Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases...</p> <p>We will:</p> <p>Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>Environmental protections already enshrined in national planning policy will be maintained and strengthened.</p> <p>New development will happen in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage. We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land.</p> <p>New homes will be built in a way that reduces demands for water, energy and material resources, improves flood resilience, minimises overheating and encourages walking and cycling. Resilient buildings and infrastructure will more readily adapt to a changing climate.</p>
<p>The Ten Point Plan for a Green Industrial Revolution (HM Government) 2020</p>	<p>Focuses on:</p> <ul style="list-style-type: none"> accelerating the shift to zero emission vehicles; green public transport, cycling and walking; greener buildings; protecting our natural environment.
<p>National Planning Policy Framework (NPPF) 2021</p>	<p>Para 20 – Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:</p> <ul style="list-style-type: none"> ...planning measures to address climate change mitigation and adaptation. <p>Para 153 - Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts...</p> <p>Para 159 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is</p>

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	<p>necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p>Para 160 - Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding...</p>
<p>Planning Practice Guidance (PPG) Climate Change 2019</p>	<p>Para 001 - effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so, local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment.</p> <p>Para 004 - When preparing Local Plans and taking planning decisions local planning authorities should pay particular attention to integrating adaptation and mitigation approaches...</p>
<p>Surrey Climate Change Strategy (SCC)</p>	<p>Sets a number of targets and actions including:</p> <ul style="list-style-type: none"> 60% emissions reduction in transport sector by 2035; 66% emissions reduction in domestic housing sector by 2035; 61% emissions reduction across commercial & public buildings sector by 2035; 56% emissions reduction across industry by 2035.
<p>Greener Futures Climate Change Delivery Plan 2021-2025 (SCC)</p>	<p>Reduce carbon emissions by 1.3m – 2.8m tonnes (20%-40%) from 2018 levels.</p> <p>Contribute to decarbonisation of electricity grid by increasing capacity of renewable energy by 1,244MW of low carbon electricity.</p> <p>Local Authority Actions to include:</p> <ul style="list-style-type: none"> Roll out EV charge point infrastructure. Embed natural capital and land use opportunities designed to sequester increased carbon emissions into all appropriate infrastructure and development schemes...

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Surrey Local Transport Plan 3 (LTP3): Climate Change Strategy (SCC) 2011	The objectives of the strategy are to reduce distance travelled by reducing the need to travel, increase travel by sustainable modes, maintain public transport patronage, switch to lower carbon vehicles, encourage efficient driving and manage traffic flows, reduce energy use of transport infrastructure and services and manage the climate change risks posed to transport.
Draft Surrey Local Transport Plan 4 (LTP4) 2022-2032 (SCC)	<p>Objectives include:</p> <p>To rapidly reduce carbon emissions, ensuring Surrey is on track for net zero emissions by 2050.</p> <p>Policy Area – Planning for Place</p> <p>Measures include:</p> <p>Establish ‘20-minute neighbourhoods’</p> <p>Develop a Surrey street family framework</p> <p>Ensure that new development is focussed around sustainable travel options</p>
Material Assets	
<p>Summary of the Local Plan’s (LP) relationship to material assets</p> <p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies to prioritise the reduction in primary aggregates use in development and supporting infrastructure through the reuse/recycling of construction/demolition wastes. The Local Plan should also provide for affordable housing and housing for different groups of the population and the infrastructure to support development across the Borough.</p> <p>The SA should include objectives assessing the need to promote the reuse/recycling of construction wastes as well as provision of affordable and other types of housing and infrastructure delivery.</p>	
National Planning Policy Framework (NPPF) 2021	<p>Para 20 – Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:</p> <p>infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>c) community facilities (such as health, education and cultural infrastructure);</p> <p>Para 60 - To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed...</p> <p>Para 62 - ...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including,</p> <p>but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.</p> <p>Para 63 - Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required.</p> <p>Para 114 - Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.</p> <p>Para 209 - It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.</p>
Surrey Health & Wellbeing Strategy (Surrey Health & Wellbeing Board) 2020	<p>Our ambitions for our place are:</p> <p>Well-connected communities, with effective infrastructure, that grow sustainably.</p>
Community Vision for Surrey in 2030 (SCC) 2018	<p>Ambitions for Place include:</p> <p>Well-connected communities, with effective infrastructure, that grow sustainably.</p>
Surrey Minerals Plan: Core Strategy (2011) Surrey County Council	<p>Vision is: -</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>Exploitation of mineral resources and other mineral development in Surrey should be efficient, environmentally responsible, adequate, as far as possible, to meet the needs of the economy and should not impose significant adverse impacts on the community</p> <p>and this is encompassed in the following: -</p> <p>reducing demand for primary minerals by encouraging efficient use of resources and recycled materials, where appropriate, in preference to excavating new resources;</p>
Surrey Minerals Plan Primary Aggregates Development Plan Document (SCC) 2011	The document identifies the preferred areas for future primary aggregate extraction for the period 2009-2026. Preferred areas for future aggregate extraction (concreting aggregate) have been listed as Addlestone Quarry Extension (Wey Manor Farm), Milton Park Farm, Egham and Whitehall Farm, Egham.
The Surrey Aggregates Recycling Joint DPD for the Waste and Minerals Plan (SCC) 2013	The document identifies the preferred areas for locating aggregate recycling facilities. Preferred areas are listed as Addlestone Quarry Extension (Wey Manor Farm), Hamm Court Farm, Milton Park Farm, Penton Hook, Lyne Lane, Land adjacent to Trump's Farm, and Martyr's Lane.
Cultural Heritage (including Architectural & Archaeological Heritage)	
<p>Summary of the Local Plan's (LP) relationship to cultural heritage</p> <p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions to minimise the risks to the historic environment by proactively planning for its protection/enhancement and enjoyment. The Local Plan should also include policies/actions to protect/enhance cultural assets and opportunities to improve access to cultural facilities/services.</p> <p>The SA framework should include objectives that relate to heritage and the protection/enhancement of cultural facilities and services and opportunities to improve access to these.</p>	
Planning (Listed Buildings and Conservation Areas) Act 1990	Sets out specific protection for buildings and areas of special architectural or historic interest.
Ancient Monuments and Archaeological Areas Act 1979	Sets out specific protection for monuments of national interest.
Historic Buildings and Ancient Monuments Act 1953	Makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).
National Planning Policy Framework (NPPF) 2021	Para 189 - assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that

Plan or Programme	Objectives, Targets or Key Message
	<p>they can be enjoyed for their contribution to the quality of life of existing and future generations.</p> <p>Para 190 - Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.</p>
Planning Practice Guidance (PPG): Historic Environment 2019	Plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting.
Landscape/Townscape	
Summary of the Local Plan's (LP) relationship to landscape/townscape	
<p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions to enhance the built environment and protect/enhance the Borough's landscapes through high quality design. The Local Plan should seek opportunities to create better connections between communities and access to services by active/sustainable travel and plan for the regeneration of areas/centres and the public realm. Policies/actions should also seek to protect/enhance and provide new opportunities for green/blue infrastructure assets and connections.</p> <p>The SA should include objectives which assess the need to protect/enhance the Borough's townscapes and landscapes, opportunities for improving connectivity by active/sustainable travel and opportunities to protect/enhance/provide green/blue infrastructure.</p>	
European Landscape Convention (EC) 2000	<p>Promotes the protection, management and planning of European landscapes and organises European co-operation on landscape issues. Open for signature by member states as well as European non-member states.</p> <p>Requires landscape to be integrated into regional and town planning policies and in cultural, environmental, agricultural, social and economic policies, as well as any other policies with possible direct or indirect impacts on landscape.</p>
A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018	<p>We will conserve and enhance the beauty of our natural environment, and make sure it can be enjoyed, used by and cared for by everyone. We will do this by:</p> <p>Safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.</p>

Plan or Programme	Objectives, Targets or Key Message
	Making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing.
National Planning Policy Framework (NPPF) 2021	<p>Para 20 – Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:</p> <p>conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure...</p> <p>Para 126 - The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development...</p> <p>Para 174 - Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> a) protecting and enhancing valued landscapes... b) recognising the intrinsic character and beauty of the countryside...including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
Planning Practice Guidance: Healthy & Safe Communities (2019)	Plan-making can play a crucial role in estate regeneration by setting a strategic vision and framework and establishing the principles to inform development early in the process.
Runnymede Corporate Business Plan (RBC) 2016-2020	<p>Enhancing Our Environment</p> <p>To proactively seek opportunities for regeneration in the Borough to assist with place shaping and the enhancement of the built environment.</p>
Economy & Employment	
<p>Summary of the Local Plan's (LP) relationship to economy & employment</p> <p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions which promote economic growth and development including for specific sectors and SME's as appropriate. The Local Plan should seek to improve the quality and offer of the towns through regeneration and ensure delivery of jobs through employment development, protect the Borough's most</p>	

Plan or Programme	Objectives, Targets or Key Message
<p>important/strategic areas of employment and promote tourism. The Local Plan should also ensure development is supported by the infrastructure needed to support economic development.</p> <p>The SA should include objectives which assess the impact (both positively and negatively) on economic activity, regeneration of the towns and tourism.</p>	
<p>Build Back Better (HM Government) 2021</p>	<p>Support our small and medium-sized enterprises (SMEs) to grow through two new schemes to boost productivity:</p> <p>Regenerate struggling towns in all parts of the UK via the UK Shared Prosperity Fund and the UK-wide Levelling Up Fund.</p> <p>Catalyse centres of excellence, supporting individuals across the country to access jobs and opportunities by ensuring digital and transport connectivity.</p> <p>Invest in net zero to create new opportunities for economic growth and jobs across the country.</p> <p>Grow our current net zero industries and encourage new ones to emerge.</p>
<p>National Planning Policy Framework (NPPF) 2021</p>	<p>Para 20 – Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:</p> <p>a) housing (including affordable housing), employment, retail, leisure and other commercial development;</p> <p>Para 81 - Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.</p> <p>Para 82 - Planning policies should:</p> <p>a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</p> <p>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</p> <p>d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.</p> <p>Para 83 - Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>
Strategic Economic Plan 2018-2030 (EM3 LEP)	<p>In the next 12 years we aim to grow our economy by 4% p.a. on average.</p> <p>Whilst the economy is strong, it is clear that Enterprise M3 is not achieving as much growth in high value sectors as it could.</p> <p>Growth in digital sectors is lower than in other parts of the country. One key to improving this is make sure the area is attractive to so-called “Young Urban Residents”.</p> <p>Priorities for growth include:</p> <ul style="list-style-type: none"> High Value Sectors for a Globally Facing Economy; Enterprise and Innovation for Scaling Up High Productivity SMEs; Skills for a High Value, High Growth Economy; Connectivity for a 21st Century Advanced Digital and Low Carbon Economy; Dynamic Communities and Sustainable Growth Corridors.
Revive & Renew (EM3 LEP)	Priorities include:

Plan or Programme	Objectives, Targets or Key Message
	<p>Job Creation and Skills for Employment</p> <p>Digitisation and an ultra-fast digital infrastructure for business resilience, innovation and growth</p> <p>Growth in our low carbon economy</p> <p>New Transport & Smart Mobility – Covid19-safe, sustainable, delivering good connectivity</p> <p>Town centres and Housing Supply – reimagined and fit for the future.</p>
Surrey Economic Strategy Statement (SCC) 2020	<p>Four key priorities to support Surrey’s growth through the current crisis and into the next decade, focused on:</p> <p>Growing the leading edge: supporting the growth of Surrey’s innovation economy;</p> <p>A ‘whole place’ approach to growing and sustaining quality places;</p> <p>Maximising opportunities within a balanced, inclusive economy;</p> <p>Capturing the potential of a greener economy</p>
Surrey’s 2050 Place Ambition v2 draft (Surrey Future) 2021	<p>Four strategic priorities:</p> <p>Improve connectivity both within Surrey and between strategically important hubs;</p> <p>Enhance the place offer of Surrey’s towns</p> <ul style="list-style-type: none"> - Strategic towns will often be the focus for investment to unlock sites, improve movement and connectivity, support economic development and create sustainable places. Egham is identified as a strategic town with Addlestone and Chertsey as secondary centres. - Continue to develop an approach to unlocking the potential of all Surrey’s towns – of strategic and local significance; established and new - which aims to: <p>Safeguard our valuable economic assets, particularly employment land and premises within town centres and close to sustainable modes of transport, ensuring that there</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>continues to be a flexible supply to meet changing economic needs, catering for established, growing and start-up businesses and attracting new employers.</p> <p>Depending on the specific details and locations of development, allow the removal of poor-quality stock from the employment land supply where sites are poorly located.</p> <p>Promote high street revitalisation through diversification and encouraging the development of multi-functional space and the co-location of different services.</p> <p>Maximise the potential of our Strategic Opportunity Areas – Includes Longcross – Staines – Heathrow Corridor; Invest in natural capital and deliver nature recovery.</p>
Runnymede Economic Strategy 2016-2020 (RBC)	<p>Five priorities identified: Business relocation, expansion and investment in the Borough – To achieve this:</p> <ul style="list-style-type: none"> - Promoting the economic importance of the ‘Upper EM3 area - Promoting the Borough as a business location - Supporting and promoting the Enterprise Zone <p>Maintaining competitive advantage through business engagement and support; A dynamic workforce for a high-tech economy; Better infrastructure for growth – deliverables include:</p> <ul style="list-style-type: none"> - Transport initiatives - Environmental enhancement of commercial sites - Town centre regeneration and management <p>Promoting innovation and technology sectors.</p>
Transport	
Summary of the Local Plan’s (LP) relationship to transport	

Plan or Programme	Objectives, Targets or Key Message
<p>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or include policies/actions which reduce the need to travel by car, seek opportunities to improve access to and connectivity with services/facilities/employment by active/sustainable modes of travel and transport hubs. The Local Plan should also include policies/actions which seeks delivery of transport infrastructure, EV charging points and other innovative technologies where appropriate.</p> <p>The SA should include objectives which assess reducing the need to travel by car, opportunities for improving access to and connectivity by active/sustainable travel to services/facilities/employment and opportunities for transport infrastructure and EV charging and maintaining/improving air quality and reducing carbon emissions.</p>	
<p>The Ten Point Plan for a Green Industrial Revolution (HM Government) 2020</p>	<p>Focuses on:</p> <ul style="list-style-type: none"> accelerating the shift to zero emission vehicles; green public transport, cycling and walking; Investing £1.3 billion in charging infrastructure to accelerate the mass adoption of electric vehicles (EVs) ahead of ending the sale of new petrol and diesel cars by 2030;
<p>Gear Change: A Bold Vision for Cycling & Walking (DfT) 2020</p>	<p>Vision - England will be a great walking and cycling nation. Places will be truly walkable. A travel revolution in our streets, towns and communities will have made cycling a mass form of transit. Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030.</p> <p>Strategic Priorities:</p> <ul style="list-style-type: none"> Accelerating modal shift to public and active transport; ... we need to ensure active travel is embedded in wider policy making, and want to encourage and empower local authorities to take bold decisions.
<p>Decarbonising Transport: A Better Greener Britain (DfT) 2021</p>	<ul style="list-style-type: none"> We will deliver a world class cycling and walking network in England by 2040. We will embed transport decarbonisation principles in spatial planning and across transport policymaking.

Plan or Programme	Objectives, Targets or Key Message
National Planning Policy Framework (NPPF) 2021	<p>Para 104 - Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <ul style="list-style-type: none"> a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; c) opportunities to promote walking, cycling and public transport use are identified and pursued; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. <p>Para 105 - The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.</p>
Transport Strategy for the South East (Transport for the South East) 2020	<p>By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step change in connectivity and environmental quality. A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life.</p> <p>Priorities include:</p> <p>Better connectivity between our major economic hubs, international gateways (ports, airports and rail terminals) and their markets;</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>More reliable journeys for people and goods travelling between the South East's major economic hubs and to and from international gateways;</p> <p>A more integrated approach to land use and transport planning that helps our partners across the South East meet future housing, employment and regeneration needs sustainably;</p> <p>A network that promotes active travel and active lifestyles to improve our health and wellbeing;</p> <p>Improved air quality supported by initiatives to reduce congestion and encourage further shifts to public transport;</p> <p>A reduction in the need to travel, particularly by private car, to reduce the impact of transport on people and the environment.</p>
Surrey Heath & Wellbeing Strategy (Surrey Health & Wellbeing Board) 2020	<p>Our ambitions for our place are:</p> <p>Journeys across the county are easier, more predictable and safer.</p>
Strategic Economic Strategy 2018-2030 (EM3 LEP)	<p>We need to address congestion in order to increase productivity and enable growth. Currently congestion acts as a major barrier to growth in key centres...</p> <p>Transport is essential to ensuring that a skilled workforce can access appropriate jobs. In some areas there is a mismatch between residents and jobs, where the skills of the local workforce don't meet those of the employer...</p> <p>Focus of our approach to transport is therefore to:</p> <ul style="list-style-type: none"> create an environment for digital solutions to connectivity... support planned housing development, and increase the attractiveness of the area as residential locations. enable the sustainable development of business growth, town centre regeneration and housing development, through the support of low carbon solutions and addressing poor air quality.
Community Vision for Surrey in 2030 (SCC) 2018	<p>Ambitions for Place include:</p> <p>Journeys across the county are easier, more predictable and safer;</p>

Plan or Programme	Objectives, Targets or Key Message
Surrey's 2050 Place Ambition v2 draft (Surrey Future) 2021	<p>Strategic priorities include:</p> <p>Improve connectivity both within Surrey and between strategically important hubs – continue to review infrastructure priorities to:</p> <ul style="list-style-type: none"> - Improve rail connectivity between Surrey's main towns and other key economic centres by securing investment in... Southern Rail access from Heathrow Airport to Surrey and beyond; - Focus on improving stations within Surrey... Develop stations by improving access to them by public transport and active modes and enhance overall quality of services; - Enhance the quality of bus services through investing in infrastructure to allow faster journeys by bus, improving the coverage of the network, providing more coordinated bus services which integrate with other transport modes and improving service frequencies, reliability, fares and customer experience. - Support the provision of a high-quality network to increase walking/cycling uptake.
Surrey Local Transport Plan 3 (SCC) 2011	<p>Vision – Helping people meet their travel needs reliably, safely and sustainably.</p> <p>Objectives:</p> <p>Effective Transport: To meet the needs of residents, business and visitors in Surrey by maintaining and improving the transport network;</p> <p>Reliable Transport: To improve the reliability of transport in Surrey;</p> <p>Safe Transport: To improve the safety and security of the travelling public in Surrey;</p> <p>Sustainable Transport: To provide a Transport systems that protects the environment, keeps people healthy and provides value for money</p>

Plan or Programme	Objectives, Targets or Key Message
Draft Surrey Local Transport Plan 4 (LTP4) 2022-2032 (SCC)	<p>Vision A future-ready transport system that allows Surrey to lead the UK in achieving a low-carbon, economically prosperous, healthy and inclusive county with excellent quality of life for all residents, whilst seeking to enhance the built and natural environments.</p> <p>Objectives include: To rapidly reduce carbon emissions, ensuring Surrey is on track for net zero emissions by 2050;</p> <p>To support Surrey’s growth ambitions and enable businesses and people to prosper sustainably;</p> <p>To provide well connected communities that encourage social mobility and ensure no-one is left behind;</p> <p>To create thriving communities with clean air, with excellent health, wellbeing and quality of life.</p> <p>Policy Area – Planning for Place Measures include: Establish ‘20-minute neighbourhoods’ Develop a Surrey street family framework Ensure that new development is focussed around sustainable travel options</p> <p>Policy Area – Active Travel/Personal Mobility New, extended and improved routes Supporting facilities Measures to encourage change on longer journey</p> <p>Policy Area – Public/Shared Transport Improving, integrating and simplifying services</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>Improving journey time reliability Improving accessibility and safety</p> <p>Policy Area – Efficient Network Management Targeted capacity improvements</p>
Waste	
<p>Summary of the Local Plan's (LP) relationship to waste</p> <p>The Local Plan, as far as it is able to do so, should retain, strengthen and/or include policies which seek to reduce further the amount of waste generated and to increase the use of recycled or recovered materials in the maintenance or construction of urban developments and supporting infrastructure. The Local Plan should also include policies which seeks to ensure space within development for waste storage.</p> <p>The SA should include objectives which assess the need to reduce resources and emphasise waste prevention/re-use/recycling in construction/demolition.</p>	
Waste Management Plan for England (DEFRA) 2021	The United Kingdom is committed to meeting its target of recovering at least 70% by weight of non-hazardous construction and demolition (C&D) waste by 2020.
A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018	<p>Policies will focus on:</p> <p>Increasing resource efficiency and reducing pollution & waste.</p> <p>We will minimise waste, reuse materials as much as we can and manage materials at the end of their life to minimise the impact on the environment. We will do this by:</p> <p>Working towards our ambition of zero avoidable waste by 2050; Working to a target of eliminating avoidable plastic waste by end of 2042; Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones;</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>Seeking to eliminate waste crime and illegal waste sites over the lifetime of this Plan, prioritising those of highest risk. Delivering a substantial reduction in litter and littering behaviour;</p> <p>Significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land.</p>
National Planning Policy for Waste 2014	<p>Positive planning plays a pivotal role in delivering this country's waste ambitions through:</p> <p>delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy;</p> <p>helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment;</p> <p>ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.</p>
Planning Practice Guidance (PPG): Waste 2015	Para 009 - Driving waste up the Waste Hierarchy is an integral part of the National waste management plan for England and national planning policy for waste.
Surrey Waste Plan (SCC) 2020	<p>Vision</p> <p>To enable sufficient waste management capacity to support Surrey's nationally important economy. To develop the circular economy in Surrey where residents and businesses produce less waste and treat more waste as a resource by re-use, recycling and recovery...</p> <p>Objectives include:</p> <p>To encourage development which supports sustainable waste management at least in line with national targets for recycling, recovery and composting;</p>

Plan or Programme	Objectives, Targets or Key Message
	<p>Policy 4 seeks to limit waste during construction, demolition and excavation phases of development to a minimum and maximise opportunities for re-use and recycling of construction, demolition and excavation waste.</p> <p>Allocates a site at Trumps Farm, Longcross for an MRF.</p>

Appendix B

Baseline Information

Biodiversity (including Flora & Fauna) & Green/Blue Infrastructure

Table B1 – List of Designated Sites in Runnymede

Site Name	LNR	SNCI	NNR	SSSI	SAC	SPA	Ramsar
Abbey Lake Complex		✓					
Addlestone Bourne at Birch & Hoyt Wood		✓					
Basingstoke Canal				✓			
Basingstoke Canal, Scotland Bridge to River Wey		✓					
Birch Wood & Hoyt Wood		✓					
Chertsey Bourne at Abbey Lake Complex		✓					
Chertsey Bourne at Chertsey Meads		✓					
Chertsey Meads	✓	✓					
Chertsey Water Works - Well Field		✓					
Chobham Common			✓	✓	✓	✓	
Fan Grove		✓					
Hall's Farm Wood & Grassland		✓					
Hardwick Court Farm Fields		✓					
Knowle Grove		✓					
Laleham Burway Golf Course		✓					
Langham Pond				✓			
Longcross Churchyard		✓					
Monk's Walk North & West (incl. M3 Exchange Land)		✓					
Pannells Farm		✓					
Park Wood		✓					
Queenwood Golf Course		✓					
River Thames - Runnymede		✓					
River Wey - Runnymede		✓					
Riverside Walk, The Bourne	✓	✓					
Runnymede (including Cooper's Hill & Cooper's Hill Slopes)		✓					
Simplemarsh Farm		✓					
Spinney Wood		✓					
The Dell - Ancient Woodland		✓					
The Moat, Woodcock Farm		✓					
Thorpe Hay Meadow				✓			
Thorpe No.1 Gravel Pit				✓		✓	✓
Trumps Mill		✓					
Wentworth Golf Courses - West Wood		✓					

Site Name	LNR	SNCI	NNR	SSSI	SAC	SPA	Ramsar
Wentworth Golf Courses - Duke's Copse & Wentworth Pond		✓					
Wentworth Golf Courses - Fish Ponds Wood		✓					
Wentworth Golf Courses - Knowle Hill		✓					
Wentworth Golf Courses - Valley Wood (inc. Great Wood)		✓					
Wey Navigation (including Addlestone Mill Pond)		✓					
Winsor Forest				✓	✓		
Windsor Great Park (combined)		✓					
Woburn Park Stream		✓					

Table B2: List of Species Identified within BOAs and their Status⁵² in Surrey (Thames Valley BOA)

Type	Species	Surrey Status	England/UK/EU Red List Species
Plants	Chamomile	Local, declining	✓
	Glandular Eyebright	Rare, declining	✓
	Greater water-parsnip	Very rare, declining	✓
	Marsh stitchwort	Very rare, declining	✓
	Tubular water-dropwort	Rare, declining	✓
Fungi/Lichens	Bearded tooth	Rare	
	Berkeley's earthstar*	Long extinct	✓
	Bitter tooth	Very rare	✓
	Coral tooth	Very rare	✓
	Frogbit smut	Very rare	✓
	Fused tooth	Rare	
	Grey tooth	Rare	
	Mealy tooth	Rare	✓
	Oak polypore	Rare	
	Ridged tooth	Rare	
	Scaly tooth	Very rare	
	Velvet tooth	Rare	
	Weathered earthstar*	Long extinct	✓
	Woolly rosette*	Long extinct	✓
	Woolly tooth	Extinct	
	Zoned rosette	Rare	
	Zoned tooth	Rare	
Caloplaca flavorubescens* (L)	Long extinct	✓	
Pyrenula nitida* (L)	Very rare, declining	✓	

⁵² Species status is taken from The State of Nature (2017). See reference in footnote 9.

Type	Species	Surrey Status	England/UK/EU Red List Species
Invertebrates	Small heath	Locally common, stable	✓
	White-letter hairstreak	Local, declining	✓
	Clay fan-foot	Rare	
	False mocha	Rare	
	Heart moth	Rare-local, declining	
	Queen's executioner (a beetle)	Long extinct	
	Stag beetle	Locally common	
	Tansy leaf-beetle	Extinct	✓
	White spotted pinion	Extinct	
Birds	Bullfinch	Local, stable-recovering	
	Bittern	Long extinct	
	Cornbunting	Extinct	✓
	Cuckoo	Local, declining	✓
	Dunnock	Common resident	
	Grasshopper warbler*	Extinct	✓
	Lesser spotted woodpecker	Rare, declining	✓
	Linnet	Local, declining	✓
	Lapwing	Local breeder, declining	✓
	Skylark	Locally common, declining	✓
	Song thrush	Common resident	✓
	Spotted flycatcher	Local, declining	✓
	Reed bunting	Local, stable-recovering	
	Tree pipit	Local, declining	✓
	Yellow wagtail*	Extinct	✓
Reptiles	Adder	Local, declining	

Type	Species	Surrey Status	England/UK/EU Red List Species
	Common lizard	Locally common, declining	
	Grass snake	Locally common	
	Slow-worm	Common, declining	
Amphibians	Common toad	Common, declining	
	Great crested newt	Local, declining	
Fish	Brown trout	Rare, declining	
	European Eel	Local, declining	✓
Mammals	Brown long-eared bat	Common, declining	
	Harvest mouse	Local, declining	
	Hedgehog	Locally common, declining	
	Noctule bat	Local, declining	
	Otter	Very rare, formerly extinct, re-colonising	
	Soprano pipistrelle bat	Common, increasing	
	Water vole*	Extinct	

*probably extinct in Surrey

Table B3: List of Species Identified within BOAs and their Status in Surrey (Thames Basin Heaths BOA)

Type	Species	Status	England/UK/EU Red List Species
Plant	Basil thyme*	Very rare, declining	✓
	Chamomile*	Local, declining	✓
	Deptford pink*	Very rare, declining	✓
	Glandular eyebright	Rare, declining	✓
	Lesser butterfly-orchid*	Very rare, declining	✓
	Marsh clubmoss	Rare, declining	✓
	Rusty fork-moss*	Extinct	✓
	Three-lobed crowfoot	Very rare, declining	✓
	Yellow bird's-nest*	Rare, declining	✓
Fungi/Lichens	Berkeley's earthstar*	Long extinct	✓
	Weathered earthstar*	Long extinct	✓
Invertebrates	Grayling	Local, declining	✓
	Silver-studded blue	Local, declining	✓
	Small heath	Locally common, stable	✓
	Goat moth	Rare	
	Shoulder-striped clover (a moth)	Very rare	
	Blue pepper-pot beetle	Rare, declining	✓
	Heath shortspur (a beetle)	Very rare	✓
	Red barbed ant*	Extinct	
	Shining guest ant	-	
	Erratic ant*	Rare, declining	
	Long-horned mining bee*	Rare, declining	
	Tormentil mining bee	Very rare, declining	
	5-banded tailed digger wasp	Very rare	
	Bloody spider-hunting wasp*	Very rare	

Type	Species	Status	England/UK/EU Red List Species
	Black-headed mason wasp*	Rare, increasing	
	Mottled bee-fly	Local	
	Serrated tongue-spider*	Extinct	✓
	Small mesh- weaver* (a spider)	Extinct	
	Silky gallows-spider	Rare, declining	
	Heath grasper* (a spider)	Rare, declining	
	Peus's long-back spider*	Local	
	Sedge jumper (a spider)	Local, declining	
	Swamp look-out spider	Rare, declining	
	Triangle hammock-spider*	Rare, declining	
	Window-winged sedge (a caddis-fly)	Rare, declining	✓
	White Admiral	Local, declining	✓
	White-letter hairstreak	Local, declining	✓
	Forester moth	Rare	
	New Forest mud beetle*	Extinct	✓
	Scarlet malachite beetle	Very rare, declining	✓
	Skeetle (a camphor) beetle*	Extinct	
	Chrysis fulgida (a ruby-tailed wasp)*	Very rare	
	Gentle groove-head spider*	Rare	✓
Birds	Bullfinch	Local, stable-recovering	
	Cuckoo	Local, declining	✓
	Dunnock	Common resident	
	Grasshopper warbler*	Extinct	✓
	Lesser redpoll*	Very rare, declining	✓
	Lesser spotted woodpecker	Rare, declining	✓
	Lapwing	Local breeder, declining	✓
	Linnet	Local, declining	✓

Type	Species	Status	England/UK/EU Red List Species
	Marsh tit	Local, declining	✓
	Nightjar	Local, increasing	
	Skylark	Locally common, declining	✓
	Song thrush	Common resident	✓
	Spotted flycatcher	Local, declining	✓
	Reed bunting	Local, stable-recovering	
	Tree pipit	Local, declining	✓
	Willow tit*	Extinct	✓
	Woodlark	Local, recovering	
Reptiles	Adder	Local, declining	
	Common lizard	Locally common, declining	
	Grass snake	Locally common	
	Slow-worm	Common, declining	
	Sand lizard	Rare and re-introduced	
	Smooth snake	Very rare and re-introduced	
Amphibians	Common toad	Common, declining	
	Great crested newt	Local, declining	
Mammals	Brown long-eared bat	Common, declining	
	Harvest mouse	Local, declining	
	Hedgehog	Locally common, declining	
	Noctule bat	Local, declining	
	Soprano pipistrelle bat	Common, increasing	
	Water vole*	Extinct	

*probably extinct in Surrey

Table B3: Condition Status of Waterbody Units in/adjacent Runnymede

Unit	Location	Ecological Condition				
		2013	2014	2015	2016	2019
Addlestone Bourne (West End to Hale/Mill Bourne)	Starts at Chobham Rides running to Fairoaks Airport	Moderate	Moderate	Moderate	Moderate	Moderate
Hale/Mill Bourne (Bagshot to Addlestone Bourne)	Starts at South Ascot running to Fairoaks Airport	Moderate	Moderate	Moderate	Moderate	Moderate
Addlestone Bourne (Mill/Hale to Chertsey Bourne)	Fairoaks Airport to The Bourne at St Georges College, Addlestone	Good	Moderate	Moderate	Moderate	Moderate
Chertsey Bourne (Ascot to Virginia Water)	Starts at Cheapside, Ascot running to Virginia Water Lake	Moderate	Moderate	Poor	Poor	Poor
Chertsey Bourne (Sunningdale to Virginia Water)	Starts in South Ascot running to Virginia Water Lake	Poor	Poor	Poor	Poor	Poor
Virginia Water Lake	Lake at Virginia Water	Poor	Poor	Poor	Poor	Poor
Chertsey Bourne (Virginia Water to Chertsey)	From Virginia Water Lake to Staines Road, Chertsey	Moderate	Moderate	Moderate	Moderate	Moderate
The Moat at Egham	Starts in Stroude running to Staines Road, Chertsey	Moderate	Poor	Poor	Poor	Poor
Chertsey Bourne (Chertsey to River Thames)	From Staines Road, Chertsey to River Thames at Weybridge	Moderate	Moderate	Moderate	Poor	Poor
Thorpe Park Lakes	Lakes at Thorpe	Moderate	Moderate	Moderate	Moderate	Poor
Wey Navigation	From Pyrford to Weybridge	Moderate	Moderate	Moderate	Moderate	Moderate
Thames (Cookham to Egham)	Runs from Cookham to Staines Bridge	Moderate	Moderate	Moderate	Moderate	Moderate
Thames (Egham To Teddington)	From Staines Bridge to Teddington	Moderate	Poor	Poor	Poor	Poor

Table B4 – Quantity Status of Thames Groundwater Units in Runnymede

Groundwater Unit	Location	Overall Status				
		2013	2014	2015	2016	2019
Chobham Bagshot Beds	Covers the area around Bracknell, Ascot, Virginia Water, Chertsey, Esther, Cobham & Woking	Good	Good	Good	Good	Poor
Lower Thames Gravels	Covers the area around Slough, Windsor, Egham, Uxbridge, Teddington	Good	Good	Good	Good	Poor

Table B5 – NO₂ Diffusion Tube Air Quality Monitoring

Location	Site ID	Year				
		2016	2017	2018	2019	2020
Civic Centre, Station Rd, Addlestone	RY1	35.9	29.8	29.1	30.8	24.3
Riverside, Pitson Close, Addlestone	RY4	22.7	17.8	20.2	19.4	14.8
Ongar Place First School, Addlestone	RY8	24	20.5	22.5	20.5	17.4
1 High Street, Addlestone	RY14	45.6	48.7	45.5	48.3	49.2
78 Woodham Lane, New Haw	RY19	33.7	31.5	32.3	32.1	28.4
London Street/Heriot Road, Chertsey	RY21	35.9	31.5	33.4	34.3	24.7
37 Bridge Road, Chertsey	RY23	42.5	33.8	47.5	56.4	41.6
1 Pooley Green Road, Egham	RY25	30.6	28.5	33.5	31.6	25.4
19 Vicarage Road, Egham	RY26	44	36.7	36.5	45.7	38.2
Chobham Lane, Longcross	RY39	25.7	23.9	28.4	26	22.5
Homewood Park, Stonehill Road	RY40	16.9	16.5	18.1	14.9	12.7
New Court, Chertsey Road, Addlestone	RY43	35.2	26.7	36.9	38.4	29.4
27/29 Weir Road, Chertsey	RY45	33.3	32.5	36	37.7	39.4
1-22 Wyvern Place, High Street, Addlestone	RY53	41.5	32.2	35.8	40.8	34
23 Brighton Road, Addlestone	RY54	33.4	28.1	29.6	32.4	26.9
158 Station Road, Addlestone	RY55	34.1	28.7	32.7	34.4	26.3

34/36 Bridge Road, Chertsey	RY56	49.4	43	40.9	46	33.4
28 Bridge Road, Chertsey	RY57	30.8	42	30.5	35.3	24.3
39 Weir Road, Chertsey	RY58	31.7	34.9	52	43.6	36.7
Bus Shelter, Chertsey Road, Addlestone	RY59	34	30.3	34.7	33.8	36.3
Renaissance Flats, High Street, Addlestone	RY60	36.3	28.9	33.3	32.9	28.3
Pine Court, Addlestone	RY61	32	30.1	30.1	29.1	23
26/28 Brighton Road, Addlestone	RY62	32.7	31.3	32.8	32.1	27.7
Garfield Road, Addlestone	RY63	22.5	30.8	21.6	25.5	20.7
Hampshire Court, Garfield Road, Addlestone	RY64	25.5	22.4	24.1	26.5	16.5
268 Station Road, Addlestone	RY65	26.1	22.4	26.7	32.2	21.5
233 Station Road, Addlestone	RY66	28.7	22.1	26.2	N/A	N/A
A320 Roundabout, Ottershaw	RY67	N/A	N/A	N/A	44.2	45.4
Addlestonemoor Roundabout	RY68	N/A	N/A	N/A	38	27.8
New Haw Road	RY69	N/A	N/A	N/A	32	26.4
Chertsey Lane, Thorpe	RY70	N/A	N/A	N/A	25.1	19.3
185 Church Road, Egham	RY71	N/A	N/A	N/A	N/A	25.6
Albany Place, Egham	RY72	N/A	N/A	N/A	N/A	18.2

Note: Figures in bold indicate exceedance of NO₂ Target of 40µg/m³