

Runnymede 2030

Annual Monitoring Report



2017 - 18



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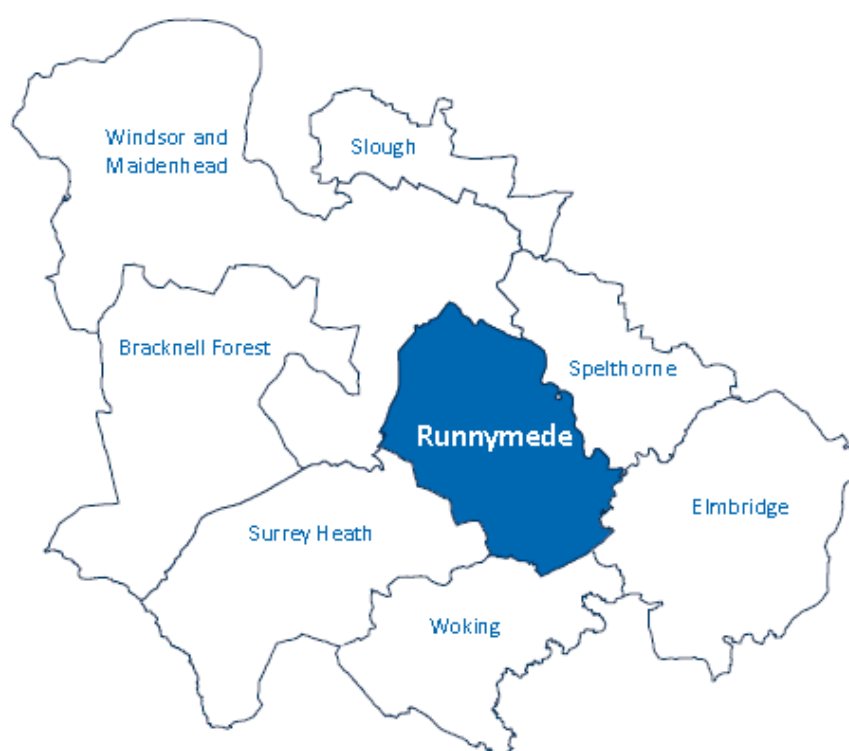
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1. Runnymede is in North West Surrey only twenty miles from Central London, and is strategically located at the junction of the M25 and M3 motorways. It has excellent road and rail connections to the capital, Heathrow Airport, and the wider South East Region, having good access to the motorway network and the Reading – Waterloo and Woking – Waterloo railway lines.
2. Runnymede is a relatively small Borough measuring only 8 miles from north to south and approximately 79% of its area lies within the Metropolitan Green Belt.

Figure 1 Runnymede and neighbouring Boroughs



3. 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.
4. 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. The local economy, in common with the rest of Surrey, is



dominated by the service sector, which employs the majority of the workforce, while manufacturing accounts for just 2%¹. Businesses and institutions in the Borough include: Ashford and St Peters Hospital Trust (ASHP), Royal Holloway (University of London), Gartner and Toshiba.²

Figure 2 Runnymede Key Diagram



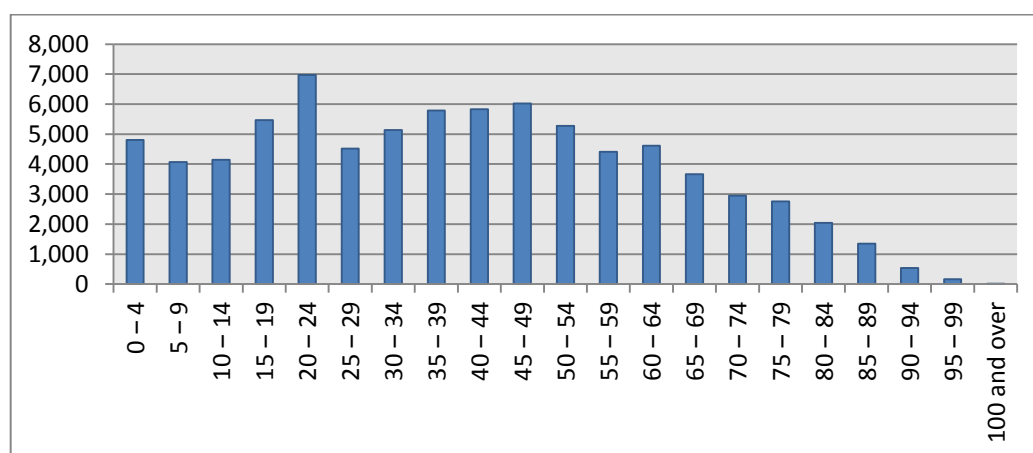
¹ Nomis Employee Jobs 2017

² Further information about the economy in Runnymede can be found in the Economic Development Strategy 2016-2019 at:

<https://www.runnymede.gov.uk/article/14622/Strategies-and-plans>

- The population of Runnymede is growing; at the time of the 2011 Census there were 32,714 households in the Borough³ (translating to an average household size of 2.36 people), accommodating a population of 80,510⁴. The age profile of the population in Runnymede is shown in figure 3 below. The 2018 partial Strategic Housing Market Area Update states that the 2014-based CLG household projections published in July 2016 (and which were underpinned by ONS (2014-based) subnational population projections (SNPP) – published in May 2016) show that in 2016 there were 34,951 households in Runnymede accommodating a population of 86,967.

Figure 3 - Runnymede Population by age (ONS- Census 2011)



- Runnymede has seen an annual average housing delivery of 278 additional dwellings being completed over the past 5 years. In the absence of an up to date Local Plan (and adopted housing target) for the Borough, the Council is benchmarking housing delivery against the Council’s identified proportion of the Objectively Assessed Housing Needs (OAHN) for the wider Housing Market Area (HMA) as set out in its most up to date Strategic Housing Market Assessment. With this in mind, over the last 5 years, the relevant housing requirements for the Council are set out in table 1 below:

³ Source: ONS Census 2011 – Table HH01 Number of households with at least one usual resident, unrounded

⁴ Source: ONS Census 2011 – Table PP04 Usual Resident population

Table 1: Housing requirement over the past 5 years in the absence of an up to date Local Plan

| Year | Housing delivered | Housing requirement | Source |
|----------------|--------------------------------------|---------------------|----------------------------------|
| 2013/14 | 70 (Includes student accommodation) | 535 | Runnymede-Spelthorne SHMA (2015) |
| 2014/15 | 124 | 535 | Runnymede-Spelthorne SHMA (2015) |
| 2015/16 | 424 (Includes student accommodation) | 535 | Runnymede-Spelthorne SHMA (2015) |
| 2016/17 | 160 | 498 | SHMA update (2018) |
| 2017/18 | 613 (Includes Care/C2Accommodation) | 498 | SHMA update (2018) |

7. House prices are on average higher than in the rest of the south east and similar to London. The availability of affordable housing to meet local needs remains a key issue in the Borough.
8. Runnymede has a rich architectural and environmental heritage, having four Grade 1 listed buildings: Royal Holloway, University of London Founders Building, the former Holloway Sanatorium, Runnymede Park and Great Fosters, along with important listed parks and gardens such as Great Fosters (Grade 2*) and Savill Garden (Grade 1). The Borough also has a number of nationally and internationally important nature conservation sites including a boundary with the Thames Basin Heaths Special Protection Area to the west and Windsor Great Park to the north-west.
9. 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, and consequently much of the eastern side of the Borough is subject to flood risk. Recreationally, there are a number of water-based activities available in Runnymede including sailing, water-skiing, wind-surfing, canal and river boating and fishing. The Thorpe No. 1 Gravel Pit is a flooded former gravel pit, which is a Site of Special Scientific Interest (SSSI). It forms part of the London Water Bodies Special Protection Area (SPA), as it supports many wintering birds including the endangered Gadwall migratory bird population.

10. 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, Chertsey Meads and the site of Chertsey Abbey.
11. The Borough has three main towns; Addlestone, Chertsey, and Egham. A brief overview of each of these centres is provided below:
 - a. Addlestone is the Borough's youngest centre, which grew with the coming of the railway in the late 19th century. Today the centre contains a mix of commercial and residential uses, with a large superstore at its centre and the Runnymede Civic Centre. Station Road, the core of Addlestone, is currently undergoing revitalisation following permission being granted for the redevelopment of the former Civic Offices site for a mix of town centre uses in 2014 (RU.14/0435). Outside the town are the long established Weybridge and Bourne Business Park and trading estate.
 - b. Chertsey is an historic town which had a famous abbey dating from Saxon times. Part of the town was 'revitalised' with modern offices and apartments in the 1990s but the high street conservation area retains much of its historic character. To the west of Chertsey is St Peters Hospital and Hillswood Business Park, which are major employment locations.
 - c. Egham lies close to the historic Runnymede Meadow, site of the sealing of the Magna Carta in 1215. Egham has seen significant commercial redevelopment, both in the town centre and along the Causeway business area, which extends towards Staines upon Thames to the north east of the town.
12. The Borough also has a number of other centres and villages, including Englefield Green New Haw, Virginia Water, Woodham, Ottershaw and Thorpe.



13. Monitoring is an essential part of the continuous planning process and Plans should be monitored to give feedback as to the effectiveness of policies.
14. Following enactment of the Localism Act, Councils are no longer required to submit an Annual Monitoring Report (AMR) to the Secretary of State. However, Councils are still required to prepare and publish an amended report known as a Monitoring Report at least annually.
15. The Planning and Compulsory Purchase Act 2004 (Local Planning Regulations, regulation 34(6)) (as amended by the Localism Act 2011) requires Local Planning Authorities (LPAs) to produce Authority Monitoring Reports (AMR) containing specific information such as status and progress of the Authority's Local Plan, the performance of policies and details as to the Authority's endeavours with regard to Duty to Cooperate. The relevant regulations with regard to the production of the AMR is included in Appendix 1 and can also be viewed on the Government website here:
<http://www.legislation.gov.uk/uksi/2012/767/regulation/34/made>
16. From 1 April 2011, all previous Government set National (Core Output) Indicators were abolished, leaving LPAs to monitor what they consider relevant. New local indicators have been developed as part of the work on the development of the Runnymede 2030 Local Plan which is currently midway through the Examination in Public process.
17. The national Planning Practice Guidance (PPG) sets out the role of the AMR. The guidance states that:

'Local planning authorities must publish information at least annually that shows progress with Local Plan preparation, reports any activity relating to the duty to cooperate and shows how the implementation of policies in the Local Plan is progressing and are encouraged to report as frequently as possible on planning matters to communities. This is important to enable communities and interested parties to be aware of progress. Local planning authorities can also use the Authority Monitoring Report to provide up-to-date information on the implementation of any neighbourhood plans that have been made, and to

determine whether there is a need to undertake a partial review or full review of the Local Plan⁵

18. This AMR reports on indicators for the period 1st April 2017 to 31st March 2018.

Core Output Indicators (COIs) (Section 1)

19. As noted above, previously, the Government set out specific Core Output Indicators (COIs) for the Council to report on; these are now obsolete and Local Authorities are free to report annually what is deemed to be of local importance.
20. Runnymede still adopts the use of these legacy indicators where relevant and will maintain these until new indicators are adopted.
21. It is anticipated that new indicators which require monitoring will emerge once the Runnymede 2030 Local Plan is nearing adoption/has been adopted. This will ensure Local Plan policies and targets can be monitored in terms of their effectiveness over the plan period. Details as to Runnymede's progress in adopting a new Local Plan are available from paragraph 23.
22. In the interim, the key statistics being reported on relate to progress with the Local Plan, Community Infrastructure Levy (CIL), economic floorspace, housing, the Duty to Cooperate and environmental quality.

⁵ PPG Paragraph: 027 Reference ID: 12-027-20140306

Local Plan Update



23. During the 2017/18 period the Council continued to progress with the preparation of a new Local Plan for the Borough (known as the Runnymede 2030 Local Plan).

This included undertaking the following two consultations on the Local Plan:

- Additional Sites and Options consultation (regulation 18) (May and June 2017)
- Draft Local Plan consultation (regulation 19) (January 2018)

The following evidence base documents/supporting documents were also published over this period:

- Equalities Impact Assessment (January 2018)
- Level 1 Strategic Flood Risk Assessment (January 2018)
- Level 2 Strategic Flood Risk Assessment (January 2018)
- Strategic Sequential Test (January 2018)
- Green Belt Review Part 2 addendum, additional assessment and Pycroft Road advice note (December 2017)
- Green Belt Villages Review Stages 1 and 2 (updates) (January 2018)
- Green Belt Technical Boundary Review (January 2018 update)
- Exceptional Circumstances paper (January 2018)
- Gypsy and Traveller Accommodation Assessment (January 2018)
- Habitats Regulations Assessment (May 2017 and December 2017)
- Draft Site Capacity Analysis (May 2017)
- Final Site Capacity Analysis (December 2017)
- Strategic Land Availability Assessment (January 2018)
- Strategic Housing Market Assessment-partial update (January 2018)
- Average unit size and minimum housing standards report (August 2017)
- Local Green Space Assessment (updated version) (December 2017)
- Draft Playing Pitch Strategy (January 2018)
- Site Selection Methodology and Assessment (Version 2) (May 2017)
- Site Selection Methodology and Assessment (December 2017)
- Final Viability Report (January 2018)
- Sustainability Appraisal (May 2017 and January 2018)
- Water Cycle Study phase 1 scoping (January 2018)
- Outline Water Cycle Study (March 2018)
- Longcross Garden Village Infrastructure and Viability Assessment (December 2017)
- Infrastructure Needs Assessment and addendum (May 2017)
- Infrastructure Delivery Plan (December 2017)
- Infrastructure Delivery Plan addendum (January 2018)
- A320 Study interim reports (December 2017, January 2018, February 2018)
- Strategic Highway Assessment Report (October 2017)

24. The Runnymede Planning Policy webpages at www.runnymede.gov.uk/planningpolicy and <https://www.runnymede.gov.uk/article/13869/Runnymede-2030-Local-Plan-Emerging-> are updated frequently to reflect the most up-to-date position on the preparation of the Plan, including details of the extensive evidence base (hard copy documents can also be obtained by emailing the Policy and Strategy team at planning@runnymede.gov.uk) and the Examination in Public process. The schedule of dates for the preparation of the Local Plan and other Development Plan Documents (DPDs) is to be found in the latest Local Development Scheme (LDS) (March 2018) which is provided in Appendix 3.
25. You can also follow us on Twitter using the handle **@rbcplanning**.

Neighbourhood Plans

26. Neighbourhood Planning is a right for communities introduced through the Localism Act 2011. It gives the opportunity for communities to shape development in their areas through the production of Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders.
27. The Thorpe Neighbourhood Forum and Thorpe Neighbourhood Area were designated by the Council on 24 August 2016. Following these designations, the Neighbourhood Forum has carried out consultation with their community and produced additional evidence to support the development of its Neighbourhood Plan.
28. A community in Englefield Green has also indicated their intention of pursuing a Neighbourhood Plan for their area although no application has been made to the Council at the time of writing.
-

Section 1

29. An important part of the monitoring process going forward will be the account of CIL monies collected on certain new developments if the Council adopts a CIL charging schedule.
30. The Council has begun to consider the infrastructure needs arising from proposed levels of growth in the new Local Plan. Consultancy firm Aecom was commissioned in the 2016/17 reporting year to produce an Infrastructure Needs Assessment (INA) for the Borough followed by an Infrastructure Delivery Plan (IDP). The INA was published in the 2016/17 reporting year and the IDP and its schedules in this 2017/18 reporting year.
31. The Council's 2017 IDP shows an infrastructure funding gap . As such, the Council will be looking to prepare a charging schedule under the Community Infrastructure Levy Regulations (2010) (as amended) for new development (the Council will specify what types of developments will require payment under the levy).
32. CIL is not intended to replace main stream funding for infrastructure but instead is used to reduce the gap between the cost of providing the required infrastructure to support a growing population, and the amount of money available from other mainstream sources, such as from Central Government, The Local Enterprise Partnership (LEP) and the Local Authority's own capital receipts.
33. The PPG encourages authorities to keep their charging schedules, once adopted, under review to ensure that CIL charges remain appropriate over time and relevant to the gap in the funding for the infrastructure needed, for instance, as market conditions change and infrastructure projects are delivered.
34. To ensure that the CIL charges remain appropriate over time, the evidence base which informs CIL (the INA and IDP), and which determines the size of the aggregate funding gap must be kept up to date. The IDP and in particular its schedules, will be a 'live' document, which, with the input of infrastructure providers will be regularly reviewed and updated over the Plan period.
36. The following will be monitored in relation to CIL as required by Regulation 62 of the CIL regulations at the appropriate time:
 - a. the total CIL receipts for the reported year;
 - b. the total CIL expenditure for the reported year;

- c. summary details of CIL expenditure during the reported year including:
- (i) the items of infrastructure to which CIL (including land payments) has been applied,
 - (ii) the amount of CIL expenditure on each item,
 - (iii) the amount of CIL applied to repay money borrowed, including any interest, with details of the infrastructure items which that money was used to provide (wholly or in part),
 - (iv) the amount of CIL applied to administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation;

- d. Summary details of the receipt and expenditure of CIL to which Regulation 59F applied during the reported year including:

- (i) Total CIL receipts that regulation 59F applied to;
- (ii) the items to which the CIL receipts to which Regulation 59F applied have been applied to
- (iii) The amount of expenditure on each item

- e. The total amount of

- (i) CIL receipts for the reported year retained at the end of the reported year other than those to which regulation 59F applied ;
 - (ii) CIL receipts from previous years retained at the end of the reported year other than those to which regulation 59F applied;
 - (iii) CIL receipts for the reported year to which regulation 59F applied retained at the end of the reported year; and
 - (iv) CIL receipts from previous years to which regulation 59F applied retained at the end of the reported year.

- f. In relation to any infrastructure payments accepted by the charging authority –
- i. the items of infrastructure to which the infrastructure payments relate,
 - ii. the amount of CIL to which each item of infrastructure relates

37. As the charging Authority, Runnymede would need to publish the report on its website by the end of December following the end of the reported year. This would require robust monitoring systems to be put in place before a CIL charging regime is adopted so that section 62 of the CIL regulations can be complied with.
38. Alongside its CIL charges, the Council is likely to adopt a Regulation 123 list which will detail the types of infrastructure or specific projects that CIL money will go towards funding. This list would also need to be reviewed over the Plan period as priorities change and projects are delivered. Again therefore, monitoring will be required to ensure that the Regulation 123 list remains relevant and up-to-date.

39. The Council plans to consult on a CIL Preliminary Draft Charging Schedule and Draft Charging Schedule in the 2019/20 reporting year with adoption of CIL in the 2020/21 reporting year or sooner if possible.
-

Business Development and Town Centres



Key pieces of evidence produced in the reporting year: The Strategic Housing Market Assessment (SHMA)-partial update (January 2018)

40. Runnymede has a strong economic base due to its strategic location in the South East, its good access to the primary road network, its proximity to Heathrow, a highly skilled workforce and a diversified business base that serves both local and sub-regional needs.

41. The Council prepared an Employment Land Review (ELR) during the course of the 2016/17 reporting year, followed by a SHMA partial update in the 2017/18 monitoring year, which contained updated employment land forecasts and which sought to build on previous work carried out in the 2016 ELR (including the employment land policy review, economic overview, information on existing employment stock, review of existing and potential employment sites; and review of the commercial property market). Together these two documents have helped inform the Council's economic policies in the forthcoming Local Plan.

42. The 2016 ELR revealed that Runnymede has a small but strong local economy that outperforms Surrey and South East averages on a number of indicators, including its high wage levels (especially workplace wages) and its historic and predicted growth rates in GVA (borough level). The Borough's other main economic strengths include its excellent transport accessibility by motorway (M25 and M3), rail and air services; its location within the economically buoyant M25 area close to Heathrow airport; its strong record in attracting inward investment, with a significant number of national and EMEA headquarters and its skilled labour force, with approximately half of all working age residents employed in higher skilled professions.

43. In respect of the future requirements for employment floorspace, the updated employment forecasts in the 2018 SHMA partial update identifies that in quantitative terms, overall there is likely to be sufficient sites with planning permission for offices (use class B1) to meet and exceed the highest forecast requirements up to 2030. However in regard to industrial the 2018 SHMA concludes that in either a labour demand or labour supply scenario, based on existing pipeline supply alone, identified needs will not be met. As such, the Local Plan proposes an allocation at the Byfleet Road site in New Haw to help meet these identified needs.

BD 1: Total amount of additional retail and commercial floorspace – by type

44. 2017/18 saw gains in both retail and commercial floor space. This was due to the completions of several large developments including RU.14/0435 Land at Station Road and RU.14/1699 Tamesis 1.

45. The relevant figures for the reporting period are in table 2 below.

Table 2 – Employment Land completions, gains and losses 2017/18

| Commercial Use Type | Net Addition/Loss (sqm) |
|----------------------------|------------------------------------|
| A1 | 5851 |
| A2 | 56 |
| A3 | 0 |
| A4 | -158 |
| A5 | 61 |
| B1a | 2994 |
| B1b | 0 |
| B1c | -294 |
| B2 | 434 |
| B8 | 406 |
| D1 | 617 |
| D2 | 2705 |
| Sui Generis | -1965 |

Housing Development

Key pieces of evidence produced in the reporting year:

Site Selection Methodology and Assessment (SSMA) (May and December 2018), Strategic Land Availability Assessment (SLAA) (2018). Site capacity analysis (May and December 2017), Strategic Housing Market Assessment-partial update (January 2018), Average unit size and minimum housing standards report (August 2017), Gypsy and Traveller Accommodation Assessment (January 2018), final Viability Report (January 2018).

Background

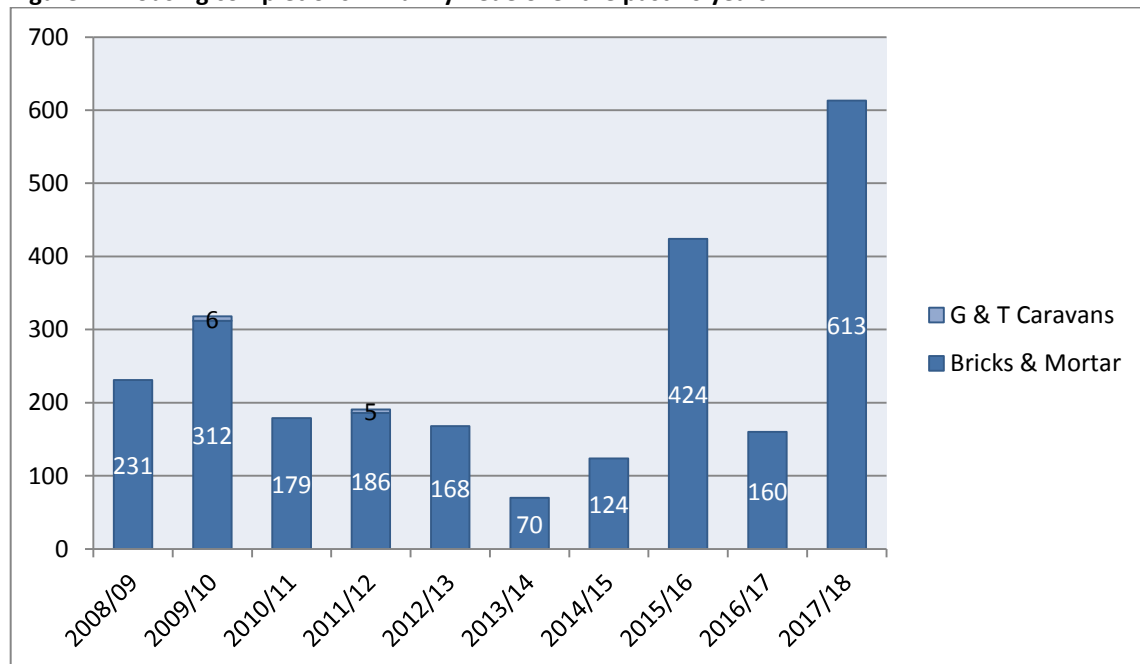
46. Housing delivery has been and remains one of the key national challenges, with Runnymede being no exception. The NPPF seeks to promote continuing economic and housing growth and sustainable development.
47. The NPPF also requires local planning authorities to identify sufficient land to meet their objectively assessed housing needs unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
 - the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area.
48. The Runnymede SLAA 2018 showed that there would be insufficient sites within the urban areas, on previously developed sites in the Green Belt and existing Local Plan housing reserve sites and windfalls to meet the needs set out in the 2018 SHMA. With the allocation of additional sites as set out in the draft Local Plan (the capacity of these sites has been robustly assessed through the Council's site capacity analysis), need would outstrip supply by 94 dwellings up to 2030.
49. The Council published its updated Site Selection Methodology Assessment during the course of the 2017/18 monitoring year and through this methodology, sites have been assessed in terms of their Green Belt performance, the existence of constraints which could affect their development potential and a range of sustainability criteria. This methodology has assisted the Council in identifying the most suitable sites for allocation in the Local Plan.

50. The Council's January 2018 Gypsy and Traveller Accommodation Assessment (GTAA) confirms that between 2015 and 2030, there is a need for 112 pitches for Gypsies and Travellers and 19 plots for Travelling Showpeople in the Borough.

H1 (a): Net additional dwellings in previous years

51. This year records 613 net dwellings for the period 2017/18. This high number is the result of completion of several large developments including Land at Wick Road (RU.14/1208) and Land at Station Road (RU.14/0435).

Figure 4 - Housing completions in Runnymede over the past 10 years



H2 (b1): Net additional dwellings for the reporting year

52. Runnymede recorded a total of 613 net additional dwellings in the 2017/18 reporting year. Runnymedes housing market area partner Spelthorne Borough Council recorded a total of 250 net additional dwellings in the 2017/18 reporting year.

H2 (b2): Bedroom information on additional dwellings

53. Information relating to bedroom numbers in new dwellings is monitored. History indicates that 2 bedroom dwellings are usually most common which is reflected in this 2017/18 monitoring year.

Table 3 – Size of Dwelling Units Completed 2017/18

| Dwelling Type | Previous | Proposed | Net |
|-----------------|-----------|-----------|-----------------------------------|
| 1 Bed | 2 | 135 | 133 |
| 2 Bed | 11 | 377 | 366 ⁶ |
| 3 Bed | 27 | 64 | 37 |
| 4 Bed and above | 12 | 89 | 77 |
| Student Units | 100 rooms | 621 Rooms | 521 Rooms (divided into 56 flats) |
| C2 Unit | 0 | 93 rooms | 93 rooms |

H2 (c): Net additional dwellings in future years

54.-The Council published the SLAA in January 2018, which supports the draft Local Plan consultation and which will be submitted with the submission Local Plan as part of the evidence base. A housing trajectory for housing expected in future years is included as part of the SLAA.

H2 (d): Managed delivery target

55. Please see paragraph 54 above.

H3: Net additional pitches (Gypsy and Traveller)

56. As set out in the Planning Policy for Traveller Sites (PPTS), which was issued by DCLG in March 2012 and updated in August 2015, it is the responsibility of local authorities to identify the number of travellers' pitches/plots that will be required based on local needs assessments.

57. Runnymede published a **Gypsy and Traveller Accommodation Assessment (GTAA)** in January 2018 which provides the basis for current need amongst the Gypsy and Traveller and Travelling Showpeople population over the next 15 years.

⁶ The C2 Units identified in planning application number RU.14/0085 Parklands is converted into housing by dividing this number by 3. It is allocated to 2 bedroom housing to reflect the most common number of development bedrooms found in the borough.

58. Two permanent pitches were recorded in the 2017/18 monitoring year. There are currently 10 temporary gypsy and traveller pitches within the borough. The Council is proposing that a number of pitches will be allocated in its emerging Local Plan to help meet identified needs.

H4: Gross and Net affordable housing completions

59. Runnymede currently exercises a policy that requires affordable housing to be provided on developments of 0.5 hectares or 15 units or above at the rate of 40% as set out in the Runnymede Borough Council Supplementary Planning Guidance (SPG) on Affordable Housing 2007. The target is set at 40% of total provision. The emerging Runnymede 2030 Local Plan contains policy SL20 which seeks, on the basis of its Local Plan viability evidence, to ensure that development of 11 net units provide 35% affordable units.
60. The 2018 SHMA sets out further information on the current affordable housing need and provides the evidence to support an approach towards the provision of affordable housing in the Borough over the period of the Runnymede 2030 Local Plan.

Table 4a - Affordable Housing Completions 2017/18

| Scheme | Gross Affordable units | Net Affordable Units |
|--|------------------------|----------------------|
| RU.13/0856 – Former Dera Site | 0 | 37 |
| RU.14/0435 – Land at Station Road | 53 | 41 |
| RU.11/0207 – Former Brunel | 0 | 36 |
| RU.14/1208 – Land at Wick Road | 0 | 22 |

Table 4b - Total net affordable housing provision 2017/18

| H5 | Social rent homes provided | Affordable Rent homes provided | Shared Ownership homes provided | Affordable homes total |
|-----------|-----------------------------------|---------------------------------------|--|-------------------------------|
| | 0 | 70 | 66 | 136 |

Environmental Quality

61. Runnymede's proximity to the River Thames and other rivers and watercourses makes the Borough particularly susceptible to flooding. According to information from the EA, approximately 30% of Runnymede is located in flood zones 2 and 3. The Council is currently updating its evidence base related to flood risk to underpin the emerging Local Plan.
62. These flooding issues are particularly important in planning for future housing. National and Local policy highlights the need to direct development away from areas of flood risk wherever possible following a sequential, risk based approach to the location of development-and taking into account the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property. If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The exception test is set out in the NPPF.
63. As a statutory consultee, the Environment Agency is consulted on certain applications that fall within the flood plain.
64. In Runnymede in November 2018 there were 11,626 residential properties in flood zone 2 and 6,541 residential properties in flood zone 3 at risk of flooding. With regard to commercial properties, 1,304 commercial properties in flood zone 2 and 517 commercial properties in flood zone 3 are at risk of flooding.

E1: Change in areas of biodiversity importance

65. Appendix 4 contains a list of sites considered to be 'areas of biodiversity importance' in Runnymede. Each of these holds at least one recognised designation. Definitions for each designation are included in the Appendix.
66. There were no known changes to any of the 'Areas of biodiversity importance' in 2017/18

Table 5- Changes to the list of areas of biodiversity importance

| | Loss | Addition | Total |
|----|------|----------|-------|
| E2 | 0 | 0 | 0 |

E2: Renewable energy generation

67. The Council has no policies or supplementary planning guidance in place at the current time which requires a defined percentage of the energy requirement of a new development to be met through the use of a renewable source.

68. Furthermore, as accurate information on the capacities of renewable technologies based on applications is not available, this indicator is not currently being monitored.

69. The Council consulted on the draft Local Plan in January 2018, in which a policy SD9 Renewable & Low Carbon Energy was included. Within this draft policy, it is stated that major development proposals will need to submit an energy statement to demonstrate how development proposals will implement the energy hierarchy of using less energy; supplying energy efficiently; and using renewable energy and that development of more than 1000 sqm will be expected to incorporate measures so that 10% of the energy requirements come from renewable and/or low carbon technologies. .

Duty to Co-operate

70. The 'Duty to Co-operate' became a legal requirement under the provisions of the Localism Act, which came into force in November 2011. In essence, it requires Local Planning Authorities such as Runnymede and other prescribed bodies to co-operate on strategic matters, so as to maximise the effectiveness of preparing Development Plan Documents and other Local Development Documents.
71. The NPPF confirms that local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.
72. Local Planning Authorities are also expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination, and recognise that co-operation should be a continuous process of engagement.

The Duty in the context of Runnymede 2017/18

73. The Council has, throughout the preparation of the 2030 Local Plan sought to liaise with, and work jointly with, neighbouring local authorities and other relevant organisations to deal with strategic issues that extend across local authority boundaries or that involve a number of different agencies. This collaborative work has taken many forms and includes:

- Organisations specifically set up to deal with regional and sub-regional issues. A good example is the Thames Basin Heaths Special Protection Area (SPA) Joint Strategic Partnership Board (JSPB), which was formed to ensure consistent and collaborative working to address issues arising from the potential impact of new

housing close to the Thames Basin Heaths SPA. This is an issue which affects 11 boroughs and districts in the region.

- The Surrey Planning Officers' Society (SPOA) comprises all the Surrey Heads of Planning. The Group meets monthly to agree joint working opportunities and arrangements, consider matters of cross boundary significance and to discuss all other issues of pan Surrey interest. It often delegates matters of detailed resolution to the Planning Working Group and the Development Management Group.

- The Planning Working Group (PWG) is a group of Planning Policy Managers in Surrey and the County Council that meets on average five times a year to discuss and resolve cross boundary policy issues, and share relevant information and experience.

74. Earlier in the plan making period (and prior to the 2017/18 monitoring year), the Council published its Duty to Cooperate Scoping Framework in October 2015. A Duty to Cooperate update statement was also published in July 2016. In the 2017/18 monitoring year the Council has produced and published the following additional Duty to Cooperate documents:

- Duty to Cooperate Update Statement (May 2017) to support the Additional Sites and Options public consultation.

- Duty to Cooperate Review (September 2017) which provides a concise, stand-alone report which reviews the discharge of the duty to cooperate to date as part of the preparation of the Runnymede 2030 Local Plan.

- Duty to Cooperate Update Statement (January 2018) to support the public consultation on the raft Local Plan.

75. These documents combined, along with those produced earlier in plan preparation and as described in paragraph 74 above provide a detailed overview of the continuous collaborative work that the Council has undertaken since work commenced on the preparation of the new Local Plan in relation to a range of strategic matters. The Council will continue to produce Duty to Cooperate update statements at key milestones during the remainder of the Plan preparation.

76. In addition to the above the Council has continued to respond to the public consultations held by other nearby and neighbouring Local Planning Authorities and other bodies as appropriate over the monitoring period.
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Section 2

Other Sources of Information

External Sources of Information

Data is collected about Runnymede and surrounding areas by external sources. Some of the key information available is shown below divided into the areas of economic, social and environmental data.

1. Economic Data Sources

- 1.1 The Office of National Statistics provides data that shows the cost of housing to income ratio. The most current information for Runnymede is for the year 2017. The data may be viewed at the following link:
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2017>
with historical information also available.
- 1.2 Nomis provides data that shows the percentage of the population claiming key benefits in Runnymede. The most current information available for Runnymede is for the year 2016. The data may be viewed at the following link:
<https://www.nomisweb.co.uk/reports/lmp/la/1946157333/report.aspx> with historical information also available.
- 1.3 Nomis provides data that shows academic qualifications within Runnymede. The most current information available for Runnymede is for the year 2016. This information may be viewed at the following link:
<https://www.nomisweb.co.uk/reports/lmp/la/1946157333/report.aspx> with historical information also available.
- 1.4 Nomis provides data that shows the overall employment rate and economic activity within Runnymede. The most current information for Runnymede is for the year 2017. This information may be viewed at the following link:
<https://www.nomisweb.co.uk/reports/lmp/la/1946157333/report.aspx>
with historical information also available.
- 1.5 Surrey provides data that shows the number of businesses within Runnymede. The most current information for Runnymede is for the year 2016. This information may be viewed at the following link:
<https://www.surreyi.gov.uk/dataset/business-demography>
with historical information also available.

- 1.6 Surrey provides data on gross value added income (gva) per person for Surrey. The most current information for Surrey is for the year 2017. This information may be viewed at the following link:
<https://www.surreyi.gov.uk/dataset/gross-value-added-income-approach-tables>
with historical information also available.

2. Social Data Sources

- 2.1 Public Health England provides data on health in Runnymede. The most current information for Runnymede is for the year 2017 and may be viewed at the following link:
<https://fingertips.phe.org.uk/profile/healthprofiles/data#page/1/ati/101/are/E07000212>
with historical information also available.
- 2.2 Surrey provides data on crime statistics in Runnymede. The most current information for Runnymede is for the year 2018 and may be viewed at the following link: <https://www.surreyi.gov.uk/dataset?q=crime%20>
with historical information also available.
- 2.3 Surrey provides data on resident's satisfaction with their local neighbourhood as a place to live. The most current information for Runnymede is for the year 2017 and may be viewed at the following link:
<https://www.surreyi.gov.uk/dataset/surrey-residents-survey-quarterly-data-satisfaction-as-place-to-live>
with historical information also available.
- 2.4 The Department of Education provides data on 16-18 years olds related to education, training and employment. The most current information for Runnymede is for the year 2016 and may be viewed at the following link:
<https://www.gov.uk/government/publications/neet-data-by-local-authority-2012-16-to-18-year-olds-not-in-education-employment-or-training>
with historical information also available.

3. Environmental Data Sources

- 3.1 Historic England provides data on buildings and gardens that are at risk. This information is updated as new data becomes available for Runnymede and may be viewed at the following link: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results?q=runnymede&searchtype=harsearch>.
- 3.2 Natural England provides data for Sites of Special Scientific Interest (SSSIs) within and adjacent to Runnymede. The most current information available for Runnymede is for the year 2016 and may be viewed at the following link: <https://designatedsites.naturalengland.org.uk/>
- 3.3 Surrey provides data for annual road traffic estimates (vehicles miles) for the county of Surrey. The most current information for Surrey is for the year 2017 and may be viewed at the following link: <https://www.surrey.gov.uk/dataset/annual-road-traffic-estimates> with historical information also available.
- 3.4 Surrey provides data on waste and recycling for Runnymede. Current information can be viewed for Runnymede at the following link: <https://www.surrey.gov.uk/dataset?q=waste%20and%20recy> with historical information also available.
- 3.5 The Department for Business, Energy and Industrial Strategy provides data on regional renewable statistics. The most current data for Surrey is for the year 2015 and may be viewed at the following link: <https://www.gov.uk/government/statistics/regional-renewable-statistics> with historical information also available.
- 3.6 Surrey provides data on CO2 emissions estimates. The most current data for Surrey is for the year 2016 and viewed at the following link: <http://www.surrey.gov.uk/ViewPage.aspx?c=datasetinformation&did=1358&v=4536> with historical information also available.
- 3.7 Surrey provides data on waste and recycling in Runnymede. The most current data for Runnymede is for the year 2016 at the following link: <https://www.surrey.gov.uk/dataset/collected-waste-statistics?q=recycling> with historical information also available.



4. Internal Information Sources

In addition to information produced externally relevant to Runnymede Borough Council, various data sources are produced in house within different departments. Some of the most relevant may be viewed below.

4.1 Large amounts of research and data have been produced in support of the Runnymede 2030 Local Plan. Information on the evidence base produced may be viewed at the following link:

<https://www.runnymede.gov.uk/article/15538/Evidence-Base-Documents->

4.2 Runnymede Borough Council produces a number of strategies and plans which are relevant borough wide or which cover the operational aspects of the Council.

These may be viewed at the following link:

<https://www.runnymede.gov.uk/article/14622/Strategies-and-plans>

4.3 In addition Runnymede Borough Council uses a performance management framework to monitor the following areas:

- Financial Position
- Key Corporate Performance/Activity Indicators
- Corporate Projects

Reports produced on the above areas may be viewed at the following

link : <https://www.runnymede.gov.uk/article/14623/Performance-management>

Appendix 1 – Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Authorities' monitoring reports

34. (1) A local planning authority's monitoring report must contain the following information—

(a) the title of the local plans or supplementary planning documents specified in the local planning authority's local development scheme;

(b) in relation to each of those documents—

(i) the timetable specified in the local planning authority's local development scheme for the document's preparation;

(ii) the stage the document has reached in its preparation; and

(iii) if the document's preparation is behind the timetable mentioned in paragraph (i) the reasons for this; and

(c) where any local plan or supplementary planning document specified in the local planning authority's local development scheme has been adopted or approved within the period in respect of which the report is made, a statement of that fact and of the date of adoption or approval.

(2) Where a local planning authority are not implementing a policy specified in a local plan, the local planning authority's monitoring report must—

(a) identify that policy; and

(b) include a statement of—

(i) the reasons why the local planning authority are not implementing the policy; and

(ii) the steps (if any) that the local planning authority intend to take to secure that the policy is implemented.

(3) Where a policy specified in a local plan specifies an annual number, or a number relating to any other period of net additional dwellings or net additional affordable dwellings in any part of the local planning authority's area, the local planning authority's monitoring report must specify the relevant number for the part of the local planning authority's area concerned—

(a) in the period in respect of which the report is made, and

(b) since the policy was first published, adopted or approved.

(4) Where a local planning authority have made a neighbourhood development order or a neighbourhood development plan (1), the local planning authority's monitoring report must contain details of these documents.

(5) Where a local planning authority have prepared a report pursuant to regulation 62 of the Community Infrastructure Levy Regulations 2010 (2), the local planning authority's monitoring report must contain the information specified in regulation 62(4) of those Regulations.

(6) Where a local planning authority have co-operated with another local planning authority, county council, or a body or person prescribed under section 33A of the Act, the local planning authority's monitoring report must give details of what action they have taken during the period covered by the report.

(7) A local planning authority must make any up-to-date information, which they have collected for monitoring purposes, available in accordance with regulation 35 as soon as possible after the information becomes available.

(8) In this regulation “neighbourhood development order” has the meaning given in section 61E of the Town and Country Planning Act 1990 (3).

Appendix 2 – Examination Inspector’s letter (April 2014)

To: Ian Maguire
Head of Planning
Runnymede Borough Council

Dear Mr Maguire

Runnymede Local Plan Core Strategy

1. Following the publication in February of my initial concerns regarding the Runnymede Local Plan Core Strategy (LPCS), a Hearing Session was held on 9th April to discuss the duty to co-operate (the duty) and the Council's broad approach to housing provision. My conclusions on those two matters are contained in the following paragraphs.
2. For the avoidance of doubt I have taken into account the planning guidance that was launched on 6 March 2014. This guidance does not change policy but sets out in the one document how existing policies should be applied.

DUTY TO CO-OPERATE

Preamble

3. In terms of the duty, the Council's evidence is largely contained within Core Document RUN 007 (and Addendum) but I have also taken into account the content of the submitted representations; the Statements on the matter in response to my Issues and Questions on Matter 1; and the discussion at the hearing session. I have also considered the Minutes of the Planning Working Group in Surrey - PWG (2012-2014) and the Surrey Planning Officers' Association¹ - SPOA (2012-2014) which were submitted by the Council after the hearing session.

Background

4. The Localism Act 2011 establishes the duty to co-operate (the duty). It stipulates that, in this case, the Borough Council is required to engage constructively, actively and on an on-going basis in the preparation of Development Plan Documents, so far as they relate to strategic matters. The engagement should include consideration of whether to consult on and prepare, and enter into and publish, agreements on joint approaches towards the preparation of planning documents. The Act also confirms that regard must be given to any guidance from the Secretary of State on the matter. That further guidance is primarily the National Planning Policy Framework (NPPF), supplemented by the planning guidance that was published in March.

¹ RBC/23 and RBC/24

5. The NPPF confirms that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those that relate to strategic priorities, such as the delivery of homes and jobs needed in an area. Strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in individual local plans. The implication is that local planning authorities should work together to assess the opportunities that exist for the substantiated unmet development requirements of one local authority to be met within the area of one or more nearby local authorities within the housing market area. The Act and the NPPF were published well before the LPCS was submitted for examination in 2014.
6. As well as the legal requirement regarding the duty, the LPCS must also be found sound, which includes a requirement for it to be positively prepared and effective. This means it must be based on effective joint working on cross-boundary strategic priorities.
7. I have taken into account the fact that there is no duty on local planning authorities to agree to accommodate the needs of a neighbouring authority but if that is the conclusion that has been reached, it must be based on clear and robust evidence and on a proper consideration of all the issues by all the relevant parties. I am also aware that nearby local planning authorities are at different stages in the plan making process, but that does not negate the requirement for co-operation.

Processes Undertaken

8. The Council did not establish a robust framework or methodology within which 'co-operation' could be progressed or monitored – for example in terms of frequency, issues to be addressed, outcomes to be anticipated, outcomes delivered and bodies to be involved. I accept that there is no specific requirement in the legislation to take a structured approach. However, the Council needs to demonstrate co-operation, co-ordination and continuous engagement and one way this may be achieved is through a more transparent process that can be appropriately managed and monitored.
9. Core document RUN 007, in paragraph 9, seeks to report how the Borough Council has co-operated with others during the preparation of the LPCS. The fifth bullet point refers to consultation and engagement with adjoining planning authorities and the County Council to discuss cross-boundary issues, although the issues are not specified. Paragraph 10 (third bullet point) takes the reader to Appendix B (Cross Boundary Co-operation with Neighbouring Authorities), which the paragraph states will demonstrate more clearly how the Council has discharged its responsibilities. In Appendix B is a list of nearby local planning authorities and a row entitled 'strategic cross-boundary issues and evidence of how these have been addressed'. However, there is no reference to housing or employment as being a strategic cross-boundary issue.
10. I was told at the hearing that this is only meant to be a list of issues where some progress has been made, although that is not clear in the document itself. The Council then referred me to Appendix D which is a list of meetings with other planning authorities. However, these meetings

were mostly held during the consultation period (14th Feb to 28th March 2013) and it specifically says that they are 'part of the consultation'. Issues discussed include Housing Strategy and the Strategic Housing Market Assessment/Housing Need but the issues are framed as questions and there is no question related to the housing and employment needs of the wider area. Whilst the involvement of nearby local planning authorities during periods of public consultation is appropriate, it could not accurately be described as constituting sustained joint working on an on-going basis. It also does not demonstrate that co-operation was sought in the early stages of plan preparation.

11. There is a row in the Table entitled 'Actions Arising from the Meeting' but there is no commitment to any further meetings or to the consideration of issues pertinent to the duty. The only such reference relates to Surrey Heath Borough Council (SHBC) where it is stated that it has raised duty to co-operate objections but there is no indication of any consideration of how or if those objections could be resolved.
12. Meetings with SHBC were held on 16th October 2012 and 11th April 2013. They related to the DERA site (which is on the boundary between the two authorities) and other strategic matters. It was agreed that 'housing shortfall' is a strategic matter but there is no indication of how any shortfall would be further considered.
13. I turn now to the Addendum to RUN 007, which covers the period June 2013 to January 2014. The Introduction states that the document 'seeks to detail the methods of co-operation and the outcomes'. The first section deals with the period between June and August 2013 but relates primarily to co-operation on a Strategic Housing Market Assessment. There was a meeting on 14th June 2013 at which representatives of planning departments across Surrey were present. A presentation was given by consultants, part of which referred to the duty. A briefing note was prepared following the meeting but although there is a section entitled 'Current Situation and Next Steps' there is no clear framework to demonstrate how it was intended to take the issue forward.
14. The Addendum then considers the period between August 2013 and January 2014. However, the only significant co-operation that is referred to is an e-mail sent by the Borough Council on 3rd September 2013 to 11 nearby local planning authorities which formed part of the public consultation exercise on the pre-submission version of the LPCS. This did not confirm that Runnymede could not meet its OAN – the question in the e-mail was framed loosely: *If it emerged that Runnymede was unable to accommodate the level of housing development sufficient to meet its objectively assessed need, would your Council be prepared to accept that a proportion of our housing requirement could be provided for in your area?*
15. Firstly this e-mail was sent very late on in the plan preparation process, way beyond the 'initial thinking' stage. Secondly the Council were aware at that stage that its OAN could not be met within the Borough, so it is a little disingenuous for the question to imply that the Council may not need to seek the co-operation of nearby local planning authorities.

16. I was told at the Hearing that because no positive responses were received to those e-mails, the Council saw no benefit in continuing the process. This does not demonstrate co-operation, co-ordination or continuous engagement. It does not reflect a pro-active approach. I understand that in many circumstances engendering co-operation is not an easy process but the Council appear to have given up at an early hurdle.
17. There appears to have been little involvement of elected Members. I was told that discussions about the duty took place at a Workshop on 26th March 2014 at which Council Leaders, Planning Portfolio Holders, Chief Executives and Heads of Planning were present. However, at the time of the Hearing there was no reported outcome from that meeting, although there was a reference to the potential for a Memorandum of Understanding² – albeit too late for me to take into account should it emerge.
18. In answer to my question 1.1³, regarding co-operation, the only organisational structure referred to which was 'set up specifically to deal with sub-regional issues' is the Thames Basin Heaths Special Protection Area Joint Strategic Partnership Board. There is no reference to any similar approach being taken with regard to meeting housing or employment needs.

Has Engagement been Constructive?

19. There has been engagement between nearby local planning authorities but in terms of meeting housing and employment needs I would not describe it as being focussed or thorough. A relatively small number of meetings have been held but there does not appear to have been any impetus or concerted effort to address the issues around strategic priorities. It has not been demonstrated that appropriate conclusions have been drawn at those meetings and that the Councils have acted on those conclusions. The meetings do not appear to have improved the likelihood of effective co-operation or progressed the matter in any significant way and they could not accurately be described as constructive.

Has Engagement been Active?

20. In the Minutes of the meetings that I refer to in paragraph 3 there are few significant references to the duty. At the meeting of SPOA on 20th September 2013 there is a reference (attributed to Runnymede Borough Council) to a signed letter of agreement and a Memorandum of Understanding 'through Surrey Leaders' but I am not aware of any progress being made on these. On 24th January 2014 there is a reference to the need to 'drive' the issue forward (i.e. the duty) but no timetable is given and there is no clear indication of how that 'drive' would be achieved.

² See paragraphs 2 and 3 of the Council's answer to my question 1.3 in document RBC/16.

³ See RBC/16

21. At the 28th February 2014 SPOA meeting there was a reference to the Workshop on 26th March 2014 (see paragraph 17 above) but I note that at the 28th March SPOA meeting it is recorded that there was 'some concern that the meeting on the 26th was not quite what was advertised'. In any event I have not been advised of the outcome of that Workshop which in any case was held after the submission of the LPCS.
22. In terms of PWG meetings there are a number of brief references to the duty and at the meeting on 13th April 2012 it was confirmed that 'the process should start as soon as possible' However, no detailed cross-boundary actions appear to have been agreed.
23. On the evidence that I have been given I am unable to conclude that the Council has been sufficiently active in trying to garner co-operation. There is little evidence that engagement has been active, or indeed constructive and collaborative. The number of meetings specifically to consider the issues appears to be relatively low and the reliance only on an exchange of e-mails between Councils (at the pre-submission stage) and some limited exchanges on the matter at the group meetings, does not demonstrate a sufficient level of activity.

Has Engagement been On-going?

24. Co-operation should start with the 'initial thinking' (NPPF paragraph 181) and evidence of effective co-operation should be demonstrated at the time the Local Plan is submitted. There is little evidence that this principle was embedded in the Council's approach during the earlier stages of plan preparation. The Act came into force in 2011 and the NPPF in March 2012. There would therefore have been the opportunity for the Council to consider its approach to fulfilling the duty prior to the publication of the plan for consultation in February 2013 and again before the second consultation in August 2013.
25. In a letter dated 3 April 2012, from the Chief Executive of Surrey Heath Borough Council to the Chief Executive of Runnymede Borough Council, it is suggested that a meeting be arranged to include discussion of the duty. Runnymede's Chief Executive confirmed that he would be pleased to take up the offer of a meeting⁴ but the representatives of both the Councils at the hearing confirmed that no such meeting took place. In my opinion this is an indication that engagement has not been on-going, despite opportunities being available for a constructive approach to be adopted from the outset. The first meetings that are specifically referred to as 'duty to co-operate meetings' were mostly held in February 2013 and are summarised in Appendix D of RUN 007 (see paragraphs 10 and 11 above). There is no indication that any further similar meetings were suggested or arranged. Engagement could not accurately be described as frequent or on-going and the evidence does not demonstrate that consideration of cross-boundary issues has been taking place from 'initial thinking'.

⁴ See RBC/20

Has Engagement been Collaborative?

26. My broad conclusion is that the evidence submitted by the Council does not demonstrate that appropriate mechanisms are in place to engender co-operation. Without clear objectives (which should have been established at the earliest opportunity following the commencement of the legal duty) regarding what the Council was seeking to achieve through co-operation, it is not possible to conclude that engagement has been collaborative. I accept that it is inevitable that different Councils will be at different stages in terms of plan preparation but I would have expected more robust evidence of collaborative engagement. No joint committees have been established specifically to address the Duty to Co-operate; no joint planning policies are proposed; and no Memoranda of Understanding have been signed. This reflects a lack of positivity and commitment to joint working.

Has Engagement been Diligent?

27. No in-depth analysis of the issues facing the local planning authorities in the wider area has been undertaken and no robust assessment of how those issues should be addressed has been prepared. There appears to be a lack of commitment to seeking a way forward. Therefore in terms of fulfilling the duty I would not describe the approach of the Borough Council as being diligent.

Has Engagement been of Mutual Benefit (the broad outcomes)?

28. Mutual benefit has not been sought yet alone achieved. As I have suggested elsewhere, it may not be possible to achieve a high level of mutual benefit but if that is the case then the evidence has to be available to demonstrate that at least the achievement of mutual benefit has been sought.

29. The Minutes of the Working Group Meetings (referred to earlier) do not report on any significant outcomes, for example there are no jointly commissioned documents proposed and this was confirmed by the Council at the Hearing.

30. The outcomes of the limited engagement are minimal and it can be concluded that strategic housing priorities across boundaries have not been properly addressed or co-ordinated and that any engagement has not been of mutual benefit.

Conclusion on the Duty to Co-operate

31. Co-operation should produce effective and deliverable policies on strategic cross boundary matters, which in this instance includes housing and employment. Effective co-operation is likely to require sustained joint working and there should be clear outcomes, one way or another. However, there is insufficient comprehensive and robust evidence to enable me to conclude that every effort has been made by Runnymede Borough Council to seek co-operation with other nearby local planning

authorities. Although there has been recent activity with regards to the duty, it is too late in the process for me to give it significant weight. It is an indication, however, that progress on the matter may be achieved in the near future.

THE COUNCIL'S BROAD APPROACH TO HOUSING PROVISION

32.Paragraph 159 of the NPPF advises that local planning authorities should have a clear understanding of housing needs in their area and should 'prepare a Strategic Housing Market Assessment to assess their full housing needs, working closely with neighbouring authorities where housing market areas cross administrative boundaries'.

33.The Council's Strategic Housing Market Assessment (SHMA) was published in 2009 and this identified a need for 1,316 dwellings a year (of which market housing is 775 dwellings). The Council accepted, however, that the weight to be attached to the SHMA is limited and it was confirmed that a new SHMA is being prepared, with completion scheduled by the end of this year. Bearing in mind the current SHMA is based only on the Borough boundary of Runnymede (and the Council are currently considering a SHMA based on a much wider geographical area⁵), I agree that it should be afforded little weight.

34.Although the Council does not have an up-to-date SHMA, covering a more appropriate housing market area, it has nevertheless concluded that its objectively assessed housing need (OAN) is 595 dwellings a year⁶. This figure is based on the interim 2011 based sub-national population predictions and the 2011 DCLG household projections. Although I have not tested the evidence on which the Council's conclusions are based, I note that a number of representors agree that the Council's OAN figure can be broadly justified on that basis.

35.Whilst I have attached some weight to the Council's findings, I remain concerned that the figures may not accurately reflect the situation over the housing market area as a whole and have not taken into account market signals (e.g. land prices, house prices etc.) or fully encompassed the needs for different types of housing.

36.Having concluded that the OAN is 595 dwellings a year, the Council considered the constraints to development in the Borough. These are identified in The Housing Context Technical Paper and include areas of flood risk, Green Belt and Special Areas of Conservation. I agree that these are significant constraints. Primarily as a consequence of these constraints, the Council has concluded that the housing target should be a minimum of 220 dwellings a year (i.e. 37% of OAN). This is a significant shortfall and further emphasises the need for the Council to have fulfilled the duty to co-operate in a more collaborative and robust way, with the objective of seeking to meet a greater proportion of its housing need, either within the Borough or elsewhere in an appropriately defined housing market area.

⁵ Area 55+ (see RUN 007 Addendum)

⁶ See Core Document RUN 019

37. Within the 3,300 additional dwellings proposed over the plan period, the Council is placing significant reliance on the DERA site (1,500 dwellings), which is currently identified as a major developed site in the Green Belt. This may be an appropriate strategy for the Council to follow but there needs to be a clearer justification for the release of this site, as opposed to other sites within the Green Belt. An Assessment of Reasonable Alternative Sites⁷ was undertaken by Barton Wilmore on behalf of Crest Nicholson and Aviva Investors (the promoters of the DERA site). The efficacy of such an approach was questioned by a number of respondents and although I understand that the impartiality of the authors could be questioned, the Council confirmed that it was satisfied with the approach taken.
38. My concerns relate more to the details in the Assessment which was published in 2012. Firstly the Report is prepared on the premise that the Council is seeking to provide 161 new dwellings a year, as opposed to the 220 referred to in policy LP02; and secondly, bearing in mind the significant shortfall in meeting housing need, there is insufficient justification as to why the minimum site thresholds have been set at 10ha and 300 dwellings. Smaller sites have only been considered 'in combination with other identified sites where these immediately adjoin one another'.
39. Policy LP02 identifies 5 reserve sites 'which may be required to meet long-term housing needs'. Although some of the sites are comparatively small, it is nevertheless my opinion that the Council should have given greater consideration to the role that these sites could play in helping to address the unmet housing needs in the short and medium term.
40. With regard to the Green Belt, I note that the Council is commissioning a Borough-wide Green Belt Review, which I was told will be completed by October 2014. This work will enable the Council to assess whether or not there are any potential sites that could be released from the Green Belt.

Conclusion on the Council's Broad Approach to Housing Provision

41. For the reasons given above I consider that the Council's evidence with regard to housing need and provision is not sufficiently robust. In other circumstances it may have been possible to suspend the Examination to enable the Council to undertake further work and I am mindful that work on the SHMA and the Green Belt Review is already programmed but is unlikely to be fully concluded until the end of this year. The Council would then need to consider amendments to the submission LPCS in order to accommodate the findings of the work, thus causing further significant delay to the Examination. In any event, whatever my conclusions may be with regard to housing provision, they would not overcome the failure to meet the duty to co-operate.

Overall Conclusion and the Way Forward

42. I am not satisfied that all available options for co-operation have been properly explored, that the Council has engaged constructively, actively

⁷ Core document RUN 022

and on an on-going basis and that the guidance in the NPPF has been given sufficient regard. My finding that the duty to co-operate has not been fulfilled is sufficient on its own to request that the Council withdraws the LPCS.

43. In terms of the Council's approach to identifying and seeking to meet housing demand I consider the evidence base to be inadequate, insufficiently up-to-date and not reflective of all relevant market and economic signals. The quality of the evidence not only has consequences for the Council's policies but also devalues any co-operation that may have been sought because it is reasonable to expect co-operation to be based on a strategy that seeks to boost significantly the supply of housing in a sustainable way.

44. In summary, whilst recognising the significant constraints to development within the Borough, I do not consider that the Council has positively sought opportunities to meet the development needs of Runnymede.

45. I understand that this is not the conclusion that the Council would have wanted. However, the up-dated SHMA will be completed by the end of the year, as will the Green Belt Assessment. These two documents, together with other existing evidence, will enable the Council to produce an up-to-date plan for the Borough, within a relatively short timescale, based on robust and justified information. This delay in plan preparation will also ensure that effective co-operation with other nearby local planning authorities can be sought. It was suggested at the Hearing that any delay to the adoption of the Plan may result in housing needs not being met in the short term and I agree that any delay in the plan making process should be avoided if possible. However, in order to be effective plans should be based on up-to-date appropriate evidence. That is not the case here and in these circumstances I must advise the Council to withdraw the Plan (under S22 of the Planning and Compulsory Purchase Act 2004 - as amended), up-date the evidence base and undertake a more rigorous assessment of cross-boundary issues. In so-doing the Council must ensure that it meets the requirements of the Duty to Co-operate. Having carried out the necessary consultation, sustainability and viability work, the Council should re-submit the Plan as soon as possible. The alternative would be for me to write my Report but it would conclude with a finding of legal non-compliance and unsoundness. I would be grateful if you could confirm the Council's position via the Programme Officer as soon as possible.

46. This also means that the Runnymede Community Infrastructure Levy: Draft Charging Schedule will have to be withdrawn because there will be no up-to-date relevant Plan for the area.

Yours sincerely

David Hogger
Inspector

29th April 2014

Runnymede Borough Council

Local Development Scheme

March 2018

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Section 1- Background

Introduction

- 1.1 The Planning and Compulsory Purchase Act 2004 introduced the requirement for Councils such as Runnymede Borough Council to prepare and keep up to date a Local Development Scheme (LDS).
- 1.2 The purpose of the LDS is to help the local community and other stakeholders in the development process to understand the range of plans that the Council has produced and intends to produce.
- 1.3 The 2004 Act was amended by provisions in the Localism Act 2011. Some of these provisions are relevant to the regulations relating to LDS. For example, the Council is no longer under obligation to submit a copy of its LDS to the Secretary of State to bring the Scheme into effect. Instead the Local Planning Authority must resolve that the scheme is to have effect and in its resolution specify the date from which the scheme is to have effect. The format of the LDS is a matter for the Council, but the regulations do specify a number of key points that the Scheme must address (including the subject matter and geographical area to which each document relates, and the timetable for the preparation and revision of the documents).
- 1.4 This LDS sets out the current development plan for the Borough and the planning work programme for the Council up to 2030 (subject to review). The Council will continue to maintain a 'live work programme' on its website www.runnymede.gov.uk/planningpolicy.

Background to the Runnymede Local Plan

- 1.5 There is a substantial amount of relevant history that is considered to be worthy of mention in this LDS. This can be summarised in the chronology below:

First Core Strategy - Withdrawn

- 1.6 The Council decided at its meeting on 19 July 2007 to withdraw the Core Strategy that it had submitted to the Secretary of State in February 2006. As the Core Strategy was withdrawn it was necessary to completely revise the LDS including the timing of document production. Subsequently changes to LDF Regulations and particular changes emerging from the Regional Spatial Strategy (RSS) led to the need for further changes. The opportunity was also taken to review the content and type of Local Development Documents (LDD's) that the Council intended to produce and to streamline the LDS to be fully reflective of the three year LDF programme.

Second Core Strategy - Withdrawn

- 1.7 The Council commenced work on its second Local Plan in 2008 and the Local Plan Core Strategy was submitted to the Secretary of State on 20 January 2014 for Examination. The Inspector appointed to hold the Examination chaired a one-day Initial Hearing session on 9 April 2014. On 29 April his Conclusions Letter was received by the Council. Besides being concerned that the Council's evidence with regard to housing need and provision was insufficiently robust, he also found that the Duty to Co-operate – established by the Localism Act 2011 - had not been fulfilled. The latter point was sufficient in itself for the Inspector to request the Council to withdraw the Local Plan

Core Strategy. The Planning Committee meeting of 25 June and Council meeting of 24 July authorised the withdrawal of the LPCS with immediate effect.

Structure of the new Runnymede Local Plan

- 1.8 The new Local Plan will contain all policies (both strategic policies and more detailed Development Management level policies), and all land use allocations necessary to guide development in the Borough up to 2030..
- 1.9 In view of the withdrawal of the second Core Strategy and the necessity of producing a new Local Plan, it is appropriate to devise a new LDS; this will be a 'living document', to be revised as circumstances necessitate during preparation of the Plan. This is the fifth iteration of the LDS that the Council has produced since starting work on the new Local Plan (October 2014, October 2015, April 2016, October 2017 and March 2018).
- 1.10 A series of timetables setting out more detail on the completion of the new Local Plan and the preparation of other documents is set out later in this document.

Section 2-LDS: Supporting Statement

Planning Policy Context for Runnymede

- 2.1 National, Regional and County level planning policies apply to Runnymede. The planning policies that will make up the Runnymede Local Plan and any supporting SPD's that are produced will need to comply with these policies and set out how they are to be applied at the local level to reflect local needs and priorities.

National Policy

- 2.2 The Government sets out its national planning policies in the NPPF (March 2012) and PPTS (August 2015). These policy documents replace the range of documents that previously provided the national planning policy context in a variety of formats (Planning Policy Statements, Planning Policy Guidance Notes and some Circulars). National policies should not be repeated in the Local Plan except to interpret into local circumstances. It should be noted that at the time of writing, the Government is currently consulting on proposals to revise the NPPF in a number of areas.
- 2.3 Furthermore, in March 2014, the Government launched the Planning Practice Guidance (PPG) as a web based resource. This guidance is also a material consideration in the plan making and development management processes.

Regional Policy

- 2.4 The adopted Surrey Structure Plan 2004 was originally saved for three years until December 2007. This plan was wholly replaced by the RSS for the region known as the South East Plan in May 2009 which covers the period up to 2026. The Government partially revoked the South East Plan on 25 March 2013 and the only retained policy relevant to Runnymede is NRM6 which relates to new residential development near the Thames Basin Heaths Special Protection Area. This policy requires the provision of mitigation to overcome identified harm to this habitat from recreational disturbance associated with additional residents in the nearby areas.

County Policy

- 2.5 The County Council produces a number of strategies and plans that must be considered as part of the development process. These are listed below as well as the years of adoption of the documents currently relied upon/referred to:

Part of the Development Plan for Runnymede

- Surrey Minerals Plan Core Strategy DPD (adopted July 2011)
- The Primary Aggregates DPD (adopted July 2011)
- The Surrey Waste Plan (adopted 2008 and currently being updated)
- The Aggregates Recycling Joint DPD for the Minerals and waste Plans (adopted February 2013)
- Minerals Site Restoration SPD.

Other relevant documents

- Surrey Connects Strategy and Action Plan (August 2011) (which has been informed by the Surrey Local Economic Assessment-December 2010)

- The Surrey Preliminary Flood Risk Assessment (adopted in June 2011)
- The Surrey Local Flood Risk Management Strategy 2017-2032 (latest version published in 2017)
- The Surrey Transport Plan (updated 2014).
- The Surrey Infrastructure Study (July 2017)
- The Surrey Hotel Futures Study (2015)

Enterprise M3 Local Enterprise Partnership

- 2.6 The Enterprise M3 is also considered worthy of mention. The LEP area stretches from the outskirts of London along the wider M3 corridor to the New Forest in the south and is one of the largest of the LEP's (by population) in the country with a population of 1.6 million and 86,500 businesses.
- 2.7 The Enterprise M3 Strategy for Growth was published in May 2013 and is also a non-statutory document, which should be considered as part of the plan making and development processes. Furthermore, the LEP also manages funding for local infrastructure on behalf of Central and European Government and produces a Growth Deal which seeks to allow significant investment in skills and technology centres, improvements to roads, sustainable transport measures and unlocking of housing developments to ensure the Enterprise M3 area remains at the forefront of technological development and innovation. Another document of note is 'Working Towards a Smarter Future: The Enterprise M3 Strategic Economic Plan (2014 – 2020)', which is the LEP's Strategic Economic Plan. This sets out that the majority of investment will be focussed on certain towns; two major investments in Egham – the Runnymede Roundabout and the Egham Sustainable Transport Package - are included in the Growth Package for Staines-upon-Thames. LEP funding is also available to other locations, especially for projects that support development and promotion of the Sci-Tech Corridor.

Local Level Documents (most relevant listed below in the context of this document but not an exhaustive list)

Saved Policies

- 2.8 A number of the policies from the Runnymede Borough Local Plan (2001) were 'saved' in 2004, with some being deleted. In April 2007 the Council's Planning Committee decided to save a wider range of policies from the 2001 Local Plan. On 25 September 2007 the Secretary of State sent a letter to Runnymede Borough Council, advising which of the 2001 Local Plan policies had been 'saved'; the Secretary of State's final list of saved Local Plan policies is shown in schedule 1.
- 2.9 It is intended that the adopted 2001 Local Plan and its saved policies will be replaced by the new Runnymede Local Plan when it is adopted. The new Runnymede Local Plan together with the relevant documents produced by Surrey County Council (as discussed in para 2.5), and South East Plan policy NRM6 will comprise the statutory development plan for the Borough.

Supplementary Planning Guidance

- 2.10 Until such a time that the Runnymede Local Plan is adopted, the Council's adopted Supplementary Planning Guidance (SPG) on issues including Affordable Housing, development in the Thames Basin Heaths SPA zone of influence, and Planning Obligations will continue to be relied upon (for a full list of the Council's existing SPG, please refer to Schedule 2 in this document).

The Evidence Base

Baseline Evidence

- 2.11 The Council's Policy and Strategy team has produced various baseline and contextual studies to underpin the Runnymede Local Plan. The final parts of the evidence base will be completed by mid April 2018. These documents will be managed and maintained by the Council's Policy and Strategy team officers, and will relate to:

- The physical, economic, social and environmental characteristics of the area
- The purposes for which land is used
- The size, distribution and composition of population, housing and employment uses
- Travel and communications: modes, volumes, direction, time and purpose
- Services and infrastructure including health, education, shops, leisure, highways, utilities, public transport; and
- Environmental evidence relating to biodiversity, and the condition of open space, SSSIs, water and air quality, flooding, etc..

- 2.12 It is anticipated that the following studies will make up the Council's evidence base:

- Functional economic area analysis
- Strategic Land Availability Assessment (SLAA) (housing completions and permissions; land availability monitoring)
- Strategic Housing Market Assessment (SHMA)
- Site Selection Methodology and Assessment
- Site Capacity Analysis
- Green Belt Reviews (GBR)
- Technical Review of Green Belt boundary
- Green Belt Villages Review
- Longcross Garden Village Infrastructure and Viability review
- Employment Land Review (ELR) and economic forecasting
- Town and Local Centres Study
- Centre Hierarchy
- Town and Local Centres Boundaries Review
- Masterplans for Chertsey and Egham
- The Surrey Hotel Futures Study
- Strategic Flood Risk Assessment (SFRA) (levels 1 and 2)
- Strategic Flooding Sequential Test
- Water Cycle Study
- Urban Area Character Appraisal
- Annual Monitoring Reports
- Transport Impact Assessment (TIA) and Strategic Highways Assessment Report
- Infrastructure Needs Assessment (INA)

- Infrastructure Delivery Plan (IDP)
- A320 Corridor Study
- Open Space Study (OSS) and Local Green Space Assessment
- Playing Pitch Strategy
- Travellers Accommodation Assessment (TAA)
- Local Plan Viability Assessment.

2.13 The evidence base will also contain documentation that details how the Council has sought to meet the requirements of the Duty to Co-operate.

Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)

2.14 The Runnymede Local Plan will be subject to SEA and SA in accordance with European Directives, national legislation and guidance. This will be co-ordinated by the Council's Policy and Strategy Team. The Local Plan will also be supported by a Habitats Regulations Assessment (HRA).

Monitoring and Review

2.15 The LDS will be subject to review and this will be reported in the Annual Monitoring Report (AMR). This will review the production of the Runnymede Local Plan documents against the timetable set out in the LDS and it will review the performance of existing 'saved' and emerging policies and proposals against national and local planning targets. It will also assess the need for new or updated Local Plan policies in light of new national or other guidance and any changes in local priorities.

2.16 The review will cover the period from 1 April to 31 March and the review process will be conducted during May and June of each year. The AMR will be published in December of each year. The AMR will form part of the evidence base as it will show trends and changes over time in the amount and location of development. Previous AMRs are displayed on the Council's website.

Resources

Internal resources

- 2.17 The table below identifies the in-house staff resources that will be available for the ongoing preparation of the Local Plan. Current resources are restricted and delivery of the content of the LDS will be challenging.

| Permanent Posts | % time | Notes |
|---|---------------|-----------------------------------|
| Corporate Director of Planning and Environmental Services | 5% | Full time |
| Local Plans Manager | 95% | Full time |
| Senior Policy and Strategy Team Officer | 70% | Part time – 90% of 0.8 fte |
| Senior Policy and Strategy Team Officer | 45% | Part time - 90% of 0.5 fte |
| Senior Policy and Strategy Team Officer | 90% | Full time |
| Policy and Strategy Team Assistant | 90% | Full time |
| Planning Information Officer | 90% | Full time |
| Graphics Officer | 5% | 10% of 0.5 fte |
| GIS Officer | 30% | Full time |
| Total – Permanent Posts | 520% | 5.2 FTE |
| | | |
| Time limited resources | | |
| Temporary Senior Policy and Strategy Team Officer | 90% | |
| Development Management Officer(s) | 10% | Equivalent to 10% of 1fte overall |
| | | |
| Total –Time limited resources | 100% | 1 FTE |
| | | |
| TOTAL - ALL | 620% | 6.2 FTE |

External Consultants

- 2.18 The Council has employed external consultants to undertake/peer review a number of the evidence base studies required, in particular where specialist technical advice has been needed.

Risk Assessment

Internal Resources

- 2.19 Ensuring an adequate budget to retain and recruit staff and pay for consultants to complete specialist aspects of evidence gathering is a key risk in meeting the timetable of the LDS. This risk can be partly managed through the consideration of seconding staff from elsewhere within the Council to support the Strategy and Policy Team when appropriate, and ensuring the correct skills are developed in house and budgets are kept under review as work progresses on the Local Plan.

- 2.20 Additional potential pressure has in recent times been placed on the Council to guarantee delivery of the Plan. The Government has given consideration to introducing new powers, and using existing powers under recent legislation, to 'intervene' if they feel local plan preparation is unduly delayed. While such intervention is of course a potential risk, it must be remembered that the ability and intention to make an 'intervention' in plan making is clearly aimed at Local Planning Authorities that are unnecessarily delaying their plans. Any such intervention is therefore unlikely to be used for a positive authority like Runnymede, which can clearly explain the reasoning behind its revised timetable, and which is actively seeking a plan that radically increases the supply of housing in its area.
- 2.21 Another matter that has implications for the production of the Local Plan is Neighbourhood Plans. These are locally created plans that constitute part of the development plan. Although they are created and driven by Neighbourhood Forums in Runnymede, such plans nevertheless do require some input from the Policy and Strategy team. The Thorpe Neighbourhood Forum is now working on its Neighbourhood Plan, and interest has been expressed in bringing forward a Neighbourhood Plan for Englefield Green.
- 2.22 Similarly, in achieving the Council's own LDS, it should be noted that the remit of the Policy and Strategy team goes further than simply dealing with the Local Plan. The work, and staffing in the team, both in terms of number of staff and expertise, will be monitored carefully to ensure that the work programme remains realistic and achievable.

Political Issues

- 2.23 Changes to political structure or direction can be a significant risk to a Plan, which takes a number of years from inception to adoption to complete. Runnymede has a stable political composition, which ameliorates this risk, but in order to ensure a consistency in the vision underpinning the Local Plan, Members are engaged throughout the Local Plan process. This engagement is through the Planning Committee, involvement in the Local Plan Members' Working Group and the SHMA Joint Member Liaison Group, and as part of their political responsibility for other Council strategies, including the Corporate Plan.

Soundness / Legal Challenge

- 2.24 Evolution in the interpretation of legislation by practitioners and PINS, usually demonstrated through other Examinations and sources is a key risk to the adoption of a Local Plan. To mitigate this risk, PINS will continue to be kept informed of Runnymede's progress with its emerging Local Plan so that they can alert the Council to any concerns regarding its soundness. Decisions issued by PINS and commentary within the industry and government will be monitored to ensure soundness is maintained.
- 2.25 Following the withdrawal of the Local Plan Core Strategy in July 2014, the Policy and Strategy team has been working to address the concerns raised by the Inspector (as summarised in section 1 of this LDS). This has included the production of a new Strategic Housing Market Assessment and also a Green Belt Review. Officers have also engaged with Members to put a robust framework in place (through the production of a Local Strategic Statement (LSS)) to ensure that the Council is better able to meet the requirements of the Duty to Co-operate.

External Resources

- 2.26 There is concern that the programme may be affected by the capacity of PINS to examine a large number of Local Plans and other DPDs over the next year. Statutory consultees such as the Environment Agency, Highways England, the County Council and adjoining local authorities may also have difficulty in handling the large number of consultation documents that they are likely to receive over this period. These factors may affect Runnymede's programme but are outside the Council's control.

Changes to the Local Development Scheme

- 2.27 The Annual Monitoring Report (AMR) will be the main mechanism for reviewing progress with the Local Plan and identifying any necessary changes. In certain circumstances it may be appropriate to change the LDS at short notice.
- 2.28 The protocol for such changes will be as follows:
1. Seek approval from Full Council for proposed change(s) to the LDS (with the LDS first going before the Planning Committee where the timetable allows); and
 2. Proceed through the formal stages of DPD/SPD production having received approval for the proposed change(s).

Section 3 - Local Plan Documents - timetables for production

Statement of Community Involvement

| | |
|--------------------------------|--|
| General | |
| Subject Matter | Statement setting out how the Council will engage with the local community in the preparation of the Runnymede Local Plan and other associated documents as well as in the determination of significant planning applications. |
| Geographical Area | Boroughwide and involving organisations beyond the Borough |
| Status | Required Document |
| Conformity | To meet the requirements of the planning regulations and have regard to the Council's Communications Strategy |
| Timetable | |
| Commencement | July 2014 |
| Public Consultation(s) | Oct 2014 |
| Date Adopted | December 2014 |
| Review Date | TBC |
| Production | |
| Organisational Lead | Local Plans Manager |
| Political Management | Planning Committee to approve consultation and participation processes and proposals; and review the representations made at the different stages of Plan preparation. Planning Committee to make recommendations to Full Council at the submission stage. |
| Internal Resources | Staff in the Policy and Strategy Team |
| External Resources | None identified |
| Stakeholder Resources | None identified |
| Data / Studies Required | Review of Regulations / Communications Strategy Consideration of potential of existing stakeholder links. Maintain Consultee database. |
| Action | Local Plans Manager / Officers in the Policy and Strategy Team |

Runnymede Local Plan

| | |
|--|--|
| General | |
| Subject Matter | The Runnymede Local Plan will set out all of the policies and land use allocations to guide development in Runnymede up to 2030. This will be based on an agreed vision for the Borough and a general strategy for its achievement. It will include a key diagram. |
| Geographical Area | Borough wide |
| Status | Development Plan Document |
| Conformity | NPPF, PPTS, nPPG, SAR, South East Plan policy NRM6. The document will have regard to the Corporate Plan for Runnymede, the results of monitoring and changes in evidence. |
| Timetable | |
| Preparation of Issues & Options | June 2016 (<i>completed</i>) |
| Consultation on Issues & Options | June to August 2016 (<i>completed</i>) |
| Consultation on Additional Sites & Options | May to June 2017 (<i>completed</i>) |
| Compilation of Draft Local Plan | October to December 2017 (<i>completed</i>) |
| Consultation on Draft Local Plan-Part 1 | January/February 2018 (<i>completed</i>) |
| Consultation on draft Local Plan and additional evidence base-Part 2 | May/June 2018 |
| Submit Plan to Sec of State | By 31 st July 2018 |
| Pre Examination Meeting | 2018 - dependent on the Secretary of State |
| Examination | 2018 - dependent on the Secretary of State |
| Estimated date for adoption | 2019 - dependent on the Secretary of State |
| Review date | TBC |
| Production | |
| Organisational lead | Local Plans Manager |
| Political management | Planning Committee to approve issues, options and proposals and review results of consultation. Either Planning Committee required to make recommendations to Full Council or direct/delegated Council approval at the submission stage. |
| Internal Resources | The Policy and Strategy team with support from GIS, Development Management and the Leadership Team Office (for Corporate Policy and Community Strategy input). |

| | |
|--------------------------------|---|
| External Resources | Stakeholders, specialist consultants as necessary |
| Stakeholder Resources | Studies/evidence produced by developers when seeking planning consent. e.g. Retail and Transport impact studies. Evidence and studies produced by Government agencies and infrastructure providers e.g. Surrey CC, Environment Agency, Natural England, DCLG, Thames Water, Health Authorities, Highways England.. |
| Data / Studies Required | Includes: SFRA, ELR, Retail Study, SHMA, SLAA, Site Selection Methodology and Assessment, Affordable Housing viability work, Transport Impact Assessment, Open space survey, Infrastructure Needs Assessment, Infrastructure Delivery Plan, Character Appraisal, GTAA, GBR, Technical Review of Green Belt boundary, FEA analysis, Town and Local Centres Study, Whole Plan Viability Assessment. |
| Action | Local Plans Manager / Officers in the Policy and Strategy team |

IDP and CIL DPD

| | |
|--|--|
| General | |
| Subject matter | CIL is a mechanism for collecting and pooling contributions from developers for the purpose of providing new/improved infrastructure required to support growth. Since 6 April 2015, the circumstances in which the Council is able to rely on section 106 contributions for this purpose has been limited. In view of this, if the Council wishes to fund infrastructure improvements in the Borough through developer contributions, it will need to implement a CIL charging regime as soon as is practically possible. The IDP is a key part of the evidence base supporting the formulation of the charging schedule and outlines the essential infrastructure needed to meet the demands of the growing population in the Borough. |
| Geographical Area | Boroughwide |
| Status | IDP-evidence based document, CIL-DPD |
| Conformity | CIL regulations (as amended), NPPF |
| Timetable | |
| Evidence base and early stakeholder engagement | 2018 – dates to follow in later edition of LDS |
| Public Consultation(s) | 2018 – dates to follow in later edition of LDS |
| Submission to Sec of State | 2019 – dates to follow in later edition of LDS |
| Pre examination meeting | TBC - dependent on the Secretary of State |
| Examination | TBC - dependent on the Secretary of State |
| Estimated date for adoption | TBC - dependent on the Secretary of State |
| Review date | TBC |
| Production | |
| Organisation lead | Local Plans Manager |
| Political Management | Planning Committee to approve proposed CIL charges at PDCS stage and DCS stage for public consultation. Planning Committee to make recommendations to Full Council at DCS and Submission stages. |
| Internal Resources | The Policy and Strategy team with support from GIS and Development Management |
| External Resources | Stakeholders |
| Stakeholder Resources | IDP: evidence from infrastructure providers (including SCC, Environment Agency and internal Council departments) on existing capacity, future provision, funding sources. CIL: Studies/evidence produced by developers when seeking planning permission, the Council's monitoring data and any data provided by developers during the preparation of the CIL viability |

| | |
|--------------------------------|---|
| | work. |
| Data / Studies Required | IDP: various-as produced by infrastructure providers. CIL: IDP, independent viability work to identify appropriate levels for CIL charges. |
| Action | Local Plans Manager / Officers in the Policy and Strategy team |

Policies Map

| | |
|--------------------------------|---|
| General | |
| Subject Matter | Map split into 3 parts (north of Borough, south of Borough and inset maps) showing the extent of policy areas referred to in all DPDs. |
| Geographical Area | Boroughwide |
| Status | Part of the Runnymede Local Plan |
| Conformity | To conform with adopted DPD's. |
| Timetable | To tie in with the timetable for the production of the Runnymede Local Plan (refer to relevant section of this document for further information in this regard). |
| Review Date | To tie in with the review of the DPD's. |
| | NOTE: The policies map will be revised at the same time that any Development Plan Document is revised or adopted. The policies map will show strategic allocations and the spatial coverage of policies. It will be submitted with the Runnymede Local Plan to the SoS by the end of July 2018. |
| Production | |
| Organisational Lead | Local Plans Manager |
| Political Management | Adoption delegated to the Corporate Head of Planning and Environmental Services. |
| Internal Resources | Policy and Strategy Team, GIS, IT support to web-enable |
| External Resources | None |
| Stakeholder Resources | None |
| Data / Studies Required | None |
| Action | Local Plans Manager / Policy and Strategy team officers /GIS |

Section 4 - Programme Management

- 4.1 Programme management will be the responsibility of the Local Plans Manager.
- 4.2 It is proposed to have two Examinations in Public: one for the Runnymede Local Plan (in 2018), and one for the Community Infrastructure Levy (CIL) (date to be confirmed).
- 4.3 A cross-party Members Local Plan Working Group provides elected members of the Council with an early opportunity to consider Local Plan matters in greater depth than is practicable at Planning Committee meetings. It comprises five elected members from the Planning Committee and is attended by officers from the Policy and Strategy team. The Local Plan Members Working Group scrutinises and comments on draft documents prior to consideration by the Planning Committee and approval for adoption by Full Council where appropriate.

Schedule 1 - Schedule of Policies Saved and Not Saved from the 2001 Runnymede Borough Local Plan

- 5.1. The Runnymede Borough Local Plan (Second Alteration) was adopted in April 2001. This document forms part of the Development Plan for Runnymede until it is superseded by the Local Plan documents proposed in this 2018 Local Development Scheme.
- 5.2. The schedule below lists all the 2001 adopted Local Plan policies and identifies which of them were 'saved' in September 2007. The weight to be accorded to the saved policies is dependent on their degree of consistency with the NPPF.

| 2001 Local Plan Policy | Policy title | Status at 2007 (i.e. saved or not saved by SoS direction) |
|------------------------|--|---|
| GEN1 | Phasing large scale development | Saved |
| GEN2 | Existing uses | Not saved |
| GB1 | Development within the Green Belt | Saved |
| GB2 | Thorpe settlement in the Green Belt | Saved |
| GB4 | Agricultural workers dwellings | Saved |
| GB5 | Outdoor sports & leisure | Saved |
| GB6 | Rebuilding & residential extensions in GB | Saved |
| GB7 | Re-use of rural buildings | Saved but context set at strategic level |
| GB8 | Safeguarding long term housing sites | Not saved |
| GB9 | Motorway service areas | Not saved |
| GB10 | Major Developed Sites in the Green Belt | Saved |
| GB12 | Wentworth | Saved |
| GB13 | Hurst Lane, Stroud | Saved |
| HO1 | Maximising housing potential | Saved |
| HO2 | Conversion of dwellings | Saved |
| HO3 | Dwelling type | Saved |
| HO4 | Housing Need | Saved |
| HO5 | New housing provision 1991-2001 | Not saved |
| HO6 | New housing provision post 2001 | Saved |
| HO7 | Housing provision post 2006 | Saved |
| HO8 | Phasing housing provision | Saved |
| HO9 | New Housing Development design etc | Saved |
| HO10 | Mobile homes, caravans | Saved |
| HO11 | Gypsy Caravan sites | Not saved |
| LE1 | General economic policy | Saved |
| LE2 | Scale, quality of econ dev in town centres | Not saved |
| LE3 | Economic development in Chertsey | Not saved |
| LE4 | Existing Economic Sites | Saved |
| SHO1 | General level of provision | Saved |
| SHO2 | Core areas in Town Centres-Acceptable Uses | Saved |
| SHO3 | Retail development within core areas | Saved |
| SHO4 | Town centres outside core areas | Saved |
| SHO5 | Local Shops (retail uses outside town centres) | Saved |
| SHO6 | Superstore developments, need & sequential test | Not saved |
| SHO7 | Uses within class A3 (Food and Drink) (<i>now</i> | Saved |

| 2001 Local Plan Policy | Policy title | Status at 2007 (i.e. saved or not saved by SoS direction) |
|------------------------|---|---|
| | <i>Classes A3 – A5 are related to food and drink premises although this is not reflected in the policy)</i> | |
| TC1 | Town Centre Strategies | Saved |
| TC2 | Town Centres outside Revitalisation Areas | Saved |
| TC3 | There is no TC3 policy | |
| TC4 | Addlestone Revitalisation Area | Saved |
| TC5 | 1-23 High St/2-4 Church Rd, 1 Simplemarsh Rd, Addlestone | Saved |
| TC6 | 6 - 22 High St | Saved |
| TC7 | 2-4 High St/1-11 Station Rd | Saved |
| TC8 | 13-21 Station Road /1 Crouch Oak Lane | Saved |
| TC9 | Chertsey Revitalisation Area | Not saved |
| TC10 | Pycroft Rd /Guildford Street access | Not saved |
| TC11 | Guildford St /Eastworth Rd/Pycroft junc | Not saved |
| TC12 | Guildford St / Pycroft Rd redev | Not saved |
| TC13 | Pycroft Rd / Guildford Street redev | Not saved |
| TC14 | Goosepool redev | Not saved |
| MV1 | Land use & transport studies | Not saved |
| MV2 | Highway works & traffic management | Not saved |
| MV3 | Transport infrastructure contributions | Saved |
| MV4 | Access and circulation arrangements | Saved |
| MV5 | Access to public transport | Saved |
| MV6 | Bus Facilities | Not saved |
| MV7 | Rail Services | Saved |
| MV8 | Lorry movements | Not saved |
| MV9 | Parking Standards | Saved |
| MV10 | Car park provision in town centres | Not Saved |
| MV11 | Private non-residential parking | Not saved |
| MV12 | Servicing Agreements | Saved |
| MV13 | Cyclists | Saved |
| MV14 | Pedestrians | Saved |
| NE1 | Use of agricultural land | Not saved |
| NE2 | Impact of new development | Not saved |
| NE3 | Fragmentation of agricultural holdings | Saved |
| NE4 | Intensive agriculture | Not saved |
| NE7 | Restoration - mineral sites | Saved |
| NE8 | Areas of Landscape Importance | Saved |
| NE10 | Landscape Problem Area | Saved |
| NE11 | Countryside management | Saved |
| NE12 | Tree protection | Saved |
| NE13 | TPOs | Saved |
| NE14 | Trees and development | Saved |
| NE15 | Landscaping schemes | Saved |
| NE16 | Sites of International and National Nature Conservation Importance. | Saved |
| NE17 | SNClS in the County | Saved |
| NE18 | Enhancement of SNClS | Saved |
| NE20 | Species protection | Saved |
| BE1 | Planning briefs/design guidance | Not saved |

Runnymede Borough Local Development Scheme. March 2018

| 2001 Local Plan Policy | Policy title | Status at 2007 (i.e. saved or not saved by SoS direction) |
|------------------------|---|---|
| BE2 | Townscape character | Saved |
| BE4 | Designation and review of Conservation Areas | Saved |
| BE5 | Development with in Conservation Areas | Saved |
| BE5A | Demolition in Conservation Areas | Saved |
| BE6 | Additional Design guidance for Developments in Conservation Areas | Saved |
| BE7 | Enhancement schemes in Conservation Areas | Saved |
| BE8 | Historic parks & gardens | Saved |
| BE9 | Proposals affecting Listed Buildings | Saved |
| BE10 | Development affecting the setting of Listed Buildings | Saved |
| BE11 | Demolition of Listed Buildings | Saved |
| BE12 | Change of Use of Listed building | Saved |
| BE13 | Buildings of Local Architectural or Historic Interest | Saved |
| BE14 | Ancient Monuments and Sites of Archaeological Interest | Saved |
| BE15 | Areas of High Archaeological Potential | Saved |
| BE16 | Preservation and Recording of Archaeological remains | Saved |
| BE17 | Chance Archaeological finds | Saved |
| BE18 | Control of advertisements | Saved |
| BE19 | Advertisement guidelines | Saved |
| BE20 | Unauthorised adverts | Not saved |
| BE21 | Horse keeping and riding | Saved |
| BE22 | Aircraft Noise | Saved |
| BE23 | Traffic Noise | Saved |
| BE24 | River Bourne floodplain land, Chertsey | Saved |
| BE25 | Access for the disabled | Saved |
| R1 | Recreational provision | Saved |
| R2 | Playing fields | Saved |
| R3 | Play areas in housing developments | Saved |
| R4 | Built recreation facilities - dual use | Saved |
| R5 | Mineral sites | Saved |
| R6 | River Thames leisure uses | Saved |
| R7 | Access to the River Thames | Saved |
| R8 | Chertsey Meads | Saved |
| R9 | Basingstoke Canal & Wey Navigation | Saved |
| R10 | Allotments | Not saved |
| R11 | Hotels & Guest Houses | Saved |
| R12 | Runnymede Meadows | Saved |
| R13 | Chertsey historic site | Not saved |
| R14 | Camping & caravanning | Not saved |
| R15 | Informal recreation e.g. walking | Not saved |
| R16 | Amenity space standards | Saved |
| SV1 | Land drainage | Saved |
| SV2 | Flooding | Saved |
| SV2A | Water quality | Saved |
| SV3 | Telecommunications | Saved |
| SV4 | Satellite dishes/antennae | Saved |
| C1 | Community Infrastructure Provision | Not saved |
| C2 | Day centres | Not saved |

Schedule 2 - Supplementary Planning Guidance and other existing local level policy guidance documents

5.3. The existing Supplementary Planning Guidance and other local level policy guidance documents listed in the schedule below are currently a material consideration in the determination of planning applications and in negotiating planning obligations.

| Document Title | Date Adopted | Saved Local Plan |
|--|---|--|
| Householder Guide SPG | July 2003 | HO9, BE2 |
| Trees Woodlands & Hedgerows SPG | July 2003 | NE12, NE13, NE14 |
| Addlestone Town Centre Strategy | September 1999 | TC1 |
| Surrey Design SPG | January 2002 (Surrey LGA) | BE2 |
| Residential extensions and Replacement Dwellings in the Green Belt SPG | November 2004 | GB6 |
| Shopfronts 1992 Design guidelines | 2001 Local Plan Appendix G (former Chertsey Cons Area leaflet 4/94) | BE2 |
| Shop Security (no date) | April 2001 (Local Plan Appendix I) | BE2 |
| Chertsey Conservation Area January 1998 | 2001 Local Plan Appendix J | BE6 |
| Egham Conservation Area | April 2001 (Local Plan Appendix J) | BE6 |
| SPG on Car Parking October 2001 (this document has 3 appendices) | Local Plan Appendix B | MV9, MV10 |
| Affordable Housing SPG | 13 December 2007 | HO4 |
| Renewable Energy Interim Advice Note (not an SPG) | February 2010 | |
| Planning Obligations SPG | December 2007 | |
| Thames Basin Heaths SPA SPG 2008 | March 2007 (revised November 2007 and November 2009) | Habitats Directive and SEP policy NRM6 |
| Housing sites Planning Brief SPG (Bridge Wharf, Chertsey, St Ann's Heath, Virginia Water, Franklands Drive, Addlestone, Wick Road, Englefield Green) | August 2001 | HO6 (reserve housing sites policy) |

Abbreviations

| | |
|--------|---|
| AMR | Annual Monitoring Report |
| CIL | Community Infrastructure Levy |
| DCS | Draft Charging Schedule |
| DPD | Development Plan Document |
| ELR | Employment Land Review |
| FEA | Functional Economic Area |
| GBR | Green Belt Review |
| IDP | Infrastructure Delivery Plan |
| INA | Infrastructure Needs Assessment |
| LDD | Local Development Document |
| LDF | Local Development Framework |
| LDS | Local Development Scheme |
| LPCS | Local Plan Core Strategy |
| LSS | Local Strategic Statement |
| NPPF | National Planning Policy Framework |
| NRM | Natural Resource Management |
| OSS | Open Space Study |
| PDCS | Preliminary Draft Charging Schedule |
| PINS | Planning Inspectorate |
| PPG | Planning Practice Guidance |
| PPTS | Planning Policy for Traveller Sites |
| RSS | Regional Spatial Strategy (which, for Runnymede, is the South East Plan) |
| SA | Sustainability Appraisal |
| SAR | Sustainability Appraisal Report |
| SCC | Surrey County Council |
| SCI | Statement of Community Involvement |
| SEA | Strategic Environmental Assessment |
| SEP | South East Plan |
| SFRA | Strategic Flood Risk Assessment |
| SHLAA | Strategic Housing Land Availability Assessment |
| SHMA | Strategic Housing Market Assessment |
| SPD | Supplementary Planning Document (The national or regional planning policies for which the Council has provided additional local guidance) |
| SPG | Supplementary Planning Guidance (additional guidance provided by the Council in support of adopted Local Plan policies) |
| TAA | Travellers Accommodation Assessment |
| TBHSPA | Thames Basin Heaths Special Protection Area |

Key Staff resources involved in Local Plan Production

| | |
|-------|---|
| CDPES | Corporate Director of Planning and Environmental Services |
| LPM | Local Plans Manager |
| PSO | Policy and Strategy Team Officers |
| GIS | Geographical Information Systems |
| DM | Development Management |

Appendix 4 – Areas of Biodiversity Importance

| Site Name | LNR | SNCI | SSSI | RAMSAR | NNR | Natura 2000 | |
|---|-----|------|------|--------|-----|-------------|-----|
| | | | | | | SAC | SPA |
| Abbey Lake Complex SNCI | | ✓ | | | | | |
| Addlestone Bourne at Birch & Hoyt Wood SNCI | | ✓ | | | | | |
| Basingstoke Canal | | | ✓ | | | | |
| Basingstoke Canal, Scotland Bridge to River Wey SNCI | | ✓ | | | | | |
| Birch Wood & Hoyt Wood SNCI | | ✓ | | | | | |
| Chertsey Bourne at Abbey Lake Complex SNCI | | ✓ | | | | | |
| Chertsey Bourne at Chertsey Meads SNCI | | ✓ | | | | | |
| Chertsey Meads SNCI | ✓ | ✓ | | | | | |
| Chertsey Water Works - Well Field SNCI | | ✓ | | | | | |
| Chobam Common [#] | | | ✓ | | ✓ | ✓1 | ✓2 |
| Fan Grove SNCI | | ✓ | | | | | |
| Hall's Farm Wood and Grassland SNCI | | ✓ | | | | | |
| Hardwick Court Farm Fields SNCI | | ✓ | | | | | |
| Knowle Grove SNCI | | ✓ | | | | | |
| Laleham Burway Golf Course SNCI | | ✓ | | | | | |
| Langham Pond | | | ✓ | | | | |
| Longcross Churchyard SNCI | | ✓ | | | | | |
| Monk's Walk North & West (incl. M3 Exchange Land) SNCI | | ✓ | | | | | |
| Pannells Farm SNCI | | ✓ | | | | | |
| Park Wood SNCI | | ✓ | | | | | |
| Queenwood Golf Course SNCI | | ✓ | | | | | |
| River Thames - Runnymede SNCI | | ✓ | | | | | |
| River Wey - Runnymede SNCI | | ✓ | | | | | |
| Riverside Walk, The Bourne SNCI | ✓ | ✓ | | | | | |
| Runnymede SNCI (including Cooper's Hill and Cooper's Hill Slopes) | | ✓ | | | | | |
| Simplemarsh Farm SNCI | | ✓ | | | | | |
| Spinney Wood SNCI | | ✓ | | | | | |
| The Dell - Ancient Woodland SNCI | | ✓ | | | | | |
| The Moat, Woodcock Farm SNCI | | ✓ | | | | | |
| Thorpe Hay Meadow | | | ✓ | | | | |
| Thorpe Park No.1 Gravel Pit [] | | | ✓ | ✓ | | | ✓ |
| Trumps Mill SNCI | | ✓ | | | | | |
| Wentworth Golf Courses - West Wood SNCI | | ✓ | | | | | |
| Wentworth Golf Courses - Duke's Copse and Wentworth Pond SNCI | | ✓ | | | | | |
| Wentworth Golf Courses - Fish Ponds Wood SNCI | | ✓ | | | | | |
| Wentworth Golf Courses - Knowle Hill SNCI | | ✓ | | | | | |
| Wentworth Golf Courses - Valley Wood (inc. Great Wood) SNCI | | ✓ | | | | | |
| Wey Navigation (including Addlestone Mill Pond) SNCI | | ✓ | | | | | |
| Windsor Forest | | | ✓ | | | ✓ | |
| Windsor Great Park (Combined) SNCI | | ✓ | | | | | |
| Woburn Park Stream SNCI | | ✓ | | | | | |

Local Nature Reserves (LNRs) are for both people and wildlife. They offer people special opportunities to study or learn about nature or simply to enjoy it.
source: <http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/lnr/default.aspx>

Sites of Nature Conservation Importance (SNCI) - is a designation used in many parts of the United Kingdom to protect areas of importance for wildlife at a county scale

Sites of special scientific interest (SSSIs) - are the country's very best wildlife and geographical sites. They include some of the most spectacular and beautiful habitats; wetlands teeming with wading birds, winding chalk rivers, flower-rich meadows, windswept shingle beaches and remote upland peat bogs.
source: <http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/sssi/default.aspx>

Ramsar Sites

Ramsar sites are wetlands of international importance, designated under the Ramsar Convention.
source: <http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/ramsars/default.aspx>

National Nature Reserves (NNR) - Many of the finest sites in England for wildlife and geology are National Nature Reserves. There are currently 222 across the country and almost all are accessible and provide great opportunities for people to experience nature.
source: <http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/nnr/default.aspx>


Special Areas of Conservation (SACs) - SACs are areas which have been given special protection under the European Union's Habitats Directive. They provide increased protection to a variety of wild animals, plants and habitats and are a vital part of global efforts to conserve the world's biodiversity.
source: <http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/sac/default.aspx>

Special Protection Areas (SPAs) - SPAs are areas which have been identified as being of national and international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the 'Birds Directive 1979' which provides enhanced protection given by the Site of Special Scientific Interest (SSSI) status all SPAs also hold.
source: <http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/spa/default.aspx>

Natura 2000 In May 1992 European Union governments adopted legislation designed to protect the most seriously threatened habitats and species across Europe. This legislation is called the Habitats Directive and complements the Birds Directive adopted in 1979. At the heart of both these Directives is the creation of a network of sites called Natura 2000. The Birds Directive requires the establishment of Special Protection Areas (SPAs) for birds. The Habitats Directive similarly requires Special Areas of Conservation (SACs) to be designated for other species, and for habitats. Together, SPAs and SACs make up the Natura 2000 series. All EU Member States contribute to the network of sites in a Europe-wide partnership
source: <http://www.natura.org/about.html>

Notes

[#] Thorpe Park No.1 Gravel Pit Is a component of South-West London waterbodies SPA
[*] Chobam Common not located in Runnymede, but its close proximity to the borough is significant
1 - Thursley, Ash, Pirbright and Chobham SAC
2 - Thames basin heaths SPA



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