

## Table of Representations & Responses to the Runnymede 2040 Local Plan draft Sustainability Appraisal Scoping Report

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
Affinity Water	No comments	Noted.	N/A
Andrew Black Consulting obo Primhill Ltd	The council is required to carry out a review to assess whether the Local Plan requires updating. The review must be carried out no later than five years from the adoption date of the plan. The Council adopted the existing 2030 Local Plan in July 2020 and it is therefore considered prudent to begin this work now.	Noted.	N/A
	Paragraph 33 states that the review should take into account changing circumstances affecting the area, or any relevant changes in national policy.	Noted.	N/A
	The Planning Practice Guidance sets out a number of issues which authorities should consider when determining whether a plan should be updated.	Noted.	N/A
	Section 2 of the SA Draft Scoping Report sets out the consideration of the Review of Relevant Plans, Policies and Programmes. In relation to the Summary of the Local Plan's relationship to Economy and Employment the SA Draft Scoping Report states:  <i>The Local Plan review, as far as it is able to do so, should retain, strengthen and/or implement policies/actions which promote economic growth and development including for specific sectors and SME's as appropriate. The Local Plan should seek to improve the quality and offer of the towns through regeneration and ensure delivery of jobs through employment development, protect the Borough's most important/strategic areas of employment and promote</i>	Noted.	N/A

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	<p><i>tourism. The Local Plan should also ensure development is supported by the infrastructure needed to support economic development.</i></p> <p><b><i>The SA should include objectives which assess the impact (both positively and negatively) on economic activity, regeneration of the towns and tourism.</i></b></p> <p>Section 12 of the SA Scoping Report sets out the Baseline Information in relation to Economy and Employment and confirmed that the economy in Runnymede continues to perform well.</p> <p>The remainder of the baseline information concentrates solely on retail. It is therefore considered that much greater emphasis should be placed upon employment land, and specifically distribution space, within any future SA accompanying the Local Plan Review.</p> <p>The consideration of the future baseline within section 12 of the SA Scoping Report sets out the following in relation to employment land:</p> <p><i>Whilst there is some uncertainty as to how fast the economy will recover following the Covid-19 pandemic, it is likely, in the absence of the plan that over the medium to longer term the local economy will continue to grow, given the Borough's accessibility to London and Heathrow, working age population profile and high level of qualifications, continuing to make the Borough a desirable business location. As such, it is likely that the Borough's population will continue to be highly qualified</i></p>	<p>Noted.</p> <p>Further information on employment land /floorspace baseline information will be added to the SA Scoping Report</p>	<p>N/A</p> <p>Yes. Add employment land/floorspace baseline information</p>

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	<p><i>and have access to high earnings with low rates of unemployment compared to other areas.</i></p> <p><i>Nevertheless, the 2040 Local Plan should include/retain policies to continue Runnymede's economic success, ensure sufficient opportunities exist for employment land/floorspace come forward to meet demand and attract inward investment. This may however place pressure on the Green Belt and the 2040 Local Plan will need to balance these competing interests depending on the level of demand/supply of employment land/floorspace.</i></p> <p>As set out in the Planning Practice Guidance, consideration is required to the most recent Annual Monitoring Report which was published by the Council in January 2022.</p> <p>The report considers the performance of the Council against Objective 12 of the Local Plan which is to maintain the economic role of Runnymede in the wider area and sustain economic growth and competitiveness by protecting the most valued employment sites and supporting development of the Borough's Enterprise Zone at Longcross Park.</p> <p>The table sets out consideration of the amount of B use class lost or gained since 2015/16 and shows the following:</p>	<p>Noted. The Scoping Report can be updated to include the latest picture in terms of employment floorspace and losses</p>	<p>Yes. Add employment information from Monitoring Report</p>

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	<table border="1" data-bbox="481 268 1126 470"> <thead> <tr> <th>Year</th> <th>£(g)(i) (B1a)</th> <th>£(g)(ii) (B1b)</th> <th>£(g)(iii) (B1c)</th> <th>B2</th> <th>B8</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>0sqm</td> <td>0sqm</td> <td>0sqm</td> <td>0sqm</td> <td>0sqm</td> </tr> <tr> <td>2016/17</td> <td>12,705sqm</td> <td>25sqm</td> <td>79sqm</td> <td>0sqm</td> <td>-156sqm</td> </tr> <tr> <td>2017/18</td> <td>7,666sqm</td> <td>0sqm</td> <td>434sqm</td> <td>434sqm</td> <td>434sqm</td> </tr> <tr> <td>2018/19</td> <td>0sqm</td> <td>0sqm</td> <td>-925sqm</td> <td>-2,965sqm</td> <td>-4,471sqm</td> </tr> <tr> <td>2019/20</td> <td>0sqm</td> <td>0sqm</td> <td>0sqm</td> <td>0sqm</td> <td>0sqm</td> </tr> <tr> <td>2020/21</td> <td>-2,188sqm</td> <td>170sqm</td> <td>0sqm</td> <td>-217sqm</td> <td>285sqm</td> </tr> <tr> <td><b>Total</b></td> <td><b>18,183sqm</b></td> <td><b>195sqm</b></td> <td><b>-412sqm</b></td> <td><b>-2,314sqm</b></td> <td><b>-3,908sqm</b></td> </tr> <tr> <td colspan="5"><b>Total Employment Space (B Use Class) Lost/Gained in SEAs Since 1 April 2015</b></td> <td><b>+11,744sqm</b></td> </tr> </tbody> </table> <p data-bbox="481 512 1205 778">Whilst there has been a clear increase in B1 Office Space there have been significant losses of B1 (c), B2 and B8 floorspace across the borough in the last 6 monitoring periods. This is considered a significant factor which any future Local Plan Review must seek to address, particularly in light of the significant demand and unmet supply that is also set out within these representations.</p> <p data-bbox="481 887 1211 1018">The Inspector's Report for the Runnymede 2030 Local Plan was issued in May 2020 and sets out a number of considerations for the provision of employment land and states at paragraph 32 (with emphasis added):</p> <p data-bbox="481 1058 1205 1385"><i>While a significant change in the economic outlook has come about in recent months, its implications for the borough will be best considered in the review of the Plan in due course. I am satisfied that the employment land targets are justified and positively prepared. <b>On-going work with the bodies referred to above, including the Local Enterprise Partnership and the strategic planning group dealing with the proposals for expansion at Heathrow, will provide an updated framework for review of these targets in the future.</b></i></p>	Year	£(g)(i) (B1a)	£(g)(ii) (B1b)	£(g)(iii) (B1c)	B2	B8	2015/16	0sqm	0sqm	0sqm	0sqm	0sqm	2016/17	12,705sqm	25sqm	79sqm	0sqm	-156sqm	2017/18	7,666sqm	0sqm	434sqm	434sqm	434sqm	2018/19	0sqm	0sqm	-925sqm	-2,965sqm	-4,471sqm	2019/20	0sqm	0sqm	0sqm	0sqm	0sqm	2020/21	-2,188sqm	170sqm	0sqm	-217sqm	285sqm	<b>Total</b>	<b>18,183sqm</b>	<b>195sqm</b>	<b>-412sqm</b>	<b>-2,314sqm</b>	<b>-3,908sqm</b>	<b>Total Employment Space (B Use Class) Lost/Gained in SEAs Since 1 April 2015</b>					<b>+11,744sqm</b>	<p data-bbox="1234 504 1727 839">Noted. The Council will be undertaking an Addendum to its Housing &amp; Economic Needs Assessment (HEDNA) as part of the Local Plan review to check whether the employment forecasts are correct in light of uncertainty due to Covid-19 impacts and Census 2021. This will be used to inform future/reviewed policy requirements.</p> <p data-bbox="1234 876 1664 906">Inspector's comments are noted.</p>	<p data-bbox="1760 504 2018 568">Yes. See above re: monitoring.</p> <p data-bbox="1760 876 1816 906">N/A</p>
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	<p><i>The Plan's provisions for the supply of employment land, including market factors and the adequacy of the existing stock, are considered in Issue 5 below.</i></p> <p>Paragraph 215 of the Inspector Report goes on to state (with emphasis added):</p> <p><i>Overall, having regard to my findings on Policy IE1 below, I am satisfied that the Plan's provision for employment gives reasonable flexibility to accommodate the needs that are likely to arise in the Plan period, including in the B1c/B2/B8 classes. On the balance of all the evidence, Runnymede's employment land market appears to be operating well in supporting business needs, including inward investment, while helping to make optimum use of the existing employment land in a heavily constrained area. This is a balanced, sustainable approach and it is supported by close working with the Local Enterprise Partnership and neighbouring planning authorities to respond to business needs. <b>It is too early to assess whether economic consequences of the coronavirus pandemic may justify provision of more employment land in the borough, including for storage and distribution.</b></i></p> <p>The current Runnymede Local Plan 2030 is based on a significantly outdated evidence base such as the Employment Land Review 2016 and Function Economic Area Analysis which was published in June 2015. Since the Covid-19 pandemic the demand and supply of employment based uses particularly those for Transport and Storage has changed significantly.</p>	<p>Noted, the Council will be updating its employment evidence as part of the Local Plan review.</p>	<p>N/A</p>

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	<p>There is a significant new and updated evidence base which demonstrates the significant demand for warehouse space in the south-east and lack of supply coming forward which includes the Industrial &amp; Logistics Viewpoint produced by Colliers in January 2022 (appendix). This sets out the following in relation to the market in the South East:</p> <p><i>Demand for warehouse space 100,000+ sq ft in the London and South East Market reached a new record of 9.2 million sq ft in 2021, up 16.4% year on year as occupiers raced to secure space. When activity is analysed within the national context, take-up in the wider South East market (including London) accounted for a national share of 18.2%, the second largest after the Midlands.</i></p> <p><i>The London and South East markets continue to be characterised by a lack of development sites which is driving land values to new record levels. If we look at the growth of the average land value in the South East, this rose by 60.5% (year on year) in January 2022 from £1.6 million per acre to £2.5 million per acre.</i></p> <p>Statistics produced by the ONS in April 2022 show a significant increase in the number of business by premises for 'Transport and Storage' from 2011 to 2021 in comparison to other uses.</p> <p>The SHMA was updated in 2018 in advance of the submission of the Local Plan for examination. The</p>	<p>Whilst the update from Colliers is noted, this is one piece of evidence and is not Runnymede specific. In any event the Council will be updating its employment evidence as part of the Local Plan review and employment monitoring will be added to the scoping baseline.</p> <p>Noted. See response above re: updating employment evidence for Local Plan review.</p> <p>Whilst latest ONS household projections show lower population</p>	<p>No.</p> <p>No.</p> <p>N/A</p>

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	<p>Introduction to the SHMA states that the housing projections were based upon the 2014-based official population and household projections from ONS. The more recent household projections for Runnymede show that population is expected to grow at a significantly lower rate over the next 20 years than previously anticipated at the time of the preparation of the current Local Plan. With this in mind it is expected that the level of housing required for future iterations of the plan is likely to be lower, particularly in light of the good delivery in recent years from the council and the existence of a five-year housing land supply.</p> <p>The clear picture for the borough at the time of this review that there is a significant demand for new employment land, particularly that related with logistics against a chronic shortage of new and existing supply. This substantial change in position must be taken into account as part of the Local Plan Review as part of the matters which the Planning Practice Guidance suggests should be included:</p> <ul style="list-style-type: none"> <li>- <b>significant economic changes that may impact on viability.; and</b></li> <li>- <b>whether any new social, environmental or economic priorities may have arisen.</b></li> </ul> <p>This significant economic change is against a backdrop where the predicted population is now not predicted to grow at the previously forecasted rates. This would therefore suggest that a change to a hybrid scheme on this site to include both residential and enterprise zone</p>	<p>growth than anticipated, the Government's standard methodology (at the time of writing) still requires the Council to use 2014 population projections for determining housing need. Even so, should the standard methodology be revised by government which lowers Runnymede's housing need, this is likely to have knock on effects for employment requirements as well.</p> <p>Reference to PPG is noted, but as stated above the Council will be updating its employment evidence as part of the Local Plan review to determine the picture of employment land/floorspace demand/supply.</p> <p>See response above re: population projections.</p>	<p>No.</p> <p>No.</p>

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	<p>would be logical and should be factored into any local plan review.</p> <p>The current SA Scoping Report concentrates largely on the retail position of the economy. Whilst this remains important, this approach would overlook the more significant changes to employment land as set out.</p> <p><b>Bittams Lane, Chertsey</b>            Parcels B and C are allocated under Policy SL15 of the adopted Local Plan as a Housing Allocation for 120 net additional dwellings (increased from 110) and 2 net additional serviced Gypsy/Traveller Pitches. Policy SL15 identifies the Development Requirements associated with the allocation</p> <p>The site is extremely well connected with very good proximity to the Strategic Road Network of the M25 and A320. Extensive improvements to the existing road infrastructure is currently being implemented to incorporate the planned capacity increases from the committed development in this area.</p> <p>Since adoption of the Local Plan, Primhill has been continuing to work towards an application for development of the site. Notwithstanding the unresolved constraints of the site around noise and air quality, the increase in building costs has meant that the deliverability of the allocation in its current form may be difficult.</p>	<p>Noted, and as stated above the scoping report will be updated to include further information on the employment baseline.</p> <p>Policy SL15 only relates to the Bittams B site, Bittams C is covered by Policy SL16.</p> <p>It is not for the SA Scoping Report to consider the merits or otherwise of amending the existing Policy for the Bittams B site. Rather this is for the Local Plan review to determine based on a range of updated evidence and informed by later stages of SA.</p> <p>See response above.</p> <p>See response above.</p>	<p>Yes. Include employment baseline information.</p> <p>N/A</p> <p>No.</p> <p>No.</p> <p>No.</p>

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	<p>A number of options have been considered for development in accordance with the requirements of the allocation which are enclosed with these representations. A policy compliant masterplan has been produced which incorporates the required number and mix of dwellings, affordable housing and the incorporation of travellers pitches (2026_SK04 A). Following discussions with numerous interested parties, an alternative version of the scheme has been produced which incorporates a hybrid approach of both housing and commercial units (2026_SK03). This option would include the provision of 60,000sq ft of enterprise park alongside approximately 90 dwellings and also the provision of traveller pitches.</p> <p>It is anticipated that the commercial floorspace would consist of low rise, single storey buildings aimed at logistics and distribution occupiers with a particular focus on 'last mile' delivery. CBRE define last mile logistics as having the following characteristics:</p> <ul style="list-style-type: none"> <li>- Edge of a town/city to reach 'chimney pots' within an hour</li> <li>- Good access to national (for goods in) and local (for delivery) road network</li> <li>- E-shape or T-shade configuration (possibly cross docked)</li> <li>- Circa 30,000 – 50,000 sq ft (definitely sub 100,000 sq ft)</li> <li>- Low site cover (circa 20-25%)</li> <li>- 8 – 10 metres eaves (no need for much racking as stock is not held in situ for long)</li> <li>- Plenty of loading doors and a significant yard</li> <li>- Good site circulation</li> </ul>	See response above	No.

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	<p>The proposed commercial space would meet all these characteristics. The provision of 8-10m high industrial / commercial units along the frontage of the site with the A320 would assist in providing noise mitigation to the remaining residential dwellings and other existing properties in Bittams Lane.</p> <p>Discussions are ongoing with Surrey County Council regarding a potential CPO for land at the southern end of the site adjacent to St Peters Way to accommodate improvements to the M25/A320 junction. This would not impact on the delivery and implementation of any of the options suggested.</p>	<p>See response above.</p> <p>See response above.</p>	<p>No.</p> <p>No.</p>
Cllr A Berardi	<p>Scoping Report has a section on Biodiversity and Green/Blue Infrastructure (GBI) aimed at providing a baseline on these key areas. However, limited information is provided on GBI, especially on green corridors present in Runnymede.</p>	<p>Noted. The Council's mapping identifies land which provides a GBI function including green corridors. However, this information requires updating to confirm typologies and quantity. As such, including information on the current extent of non-statutory GBI in the SA scoping may give a misleading picture of the actual baseline. Further information on Runnymede's GBI can be added, provided this gives an accurate baseline position and is available. To note, all of the green corridors currently identified on the Council's mapping are also covered by national/local nature conservation</p>	<p>Yes. Add further detail on GBI where this can be accurately identified/quantified.</p>

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	<p><b>Enhancing Connectivity</b></p> <p>English landscape is unique in the world, characterised by a matrix of intensively managed agricultural land, urban areas and semi-natural habitats. Connecting the remnant patches of semi-natural habitats are linear features such as rivers, hedges, streams, and transport verges. These linear 'green' corridors allow the migration of species between habitats, preventing the collapse of our remaining green spaces through inbreeding and localised species extinction. This is especially significant as we face extreme weather patterns which will require a more connected landscape for species to move out of spaces that are no longer suitable to live in and into more suitable spaces.</p> <p>Natural England, 'Making Space for Nature: A review of England's Wildlife Sites and Ecological Network', Professor Sir John Lawton chaired the compilation of overwhelming evidence demonstrating how our natural environment provides us with a range of life saving and enhancing benefits. These benefits are described as 'ecosystem services' and include the provision of food, clean water, materials, flood defences and carbon sequestration. Biodiversity underpins most, if not all, of these crucial ecosystem services. In Runnymede, we rely on our natural habitats to mitigate extreme flooding, summer heatwaves, air pollution and noise, and to capture and store carbon. Without these crucial</p>	<p>designations which have already been taken into account in the SA Scoping.</p> <p>Noted. The SA Scoping can be updated to reinforce the role green corridors play in species migration.</p> <p>Noted, reference to ecosystem services can be made in SA Scoping.</p>	<p>Yes. Set out role of green corridors.</p> <p>Yes. Add reference to ecosystem services.</p>

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	<p>ecosystem services provided by nature, our livelihoods and wellbeing would be in a much worse position.</p> <p>Report's Executive Summary states:            "Ecological networks have become widely recognised as an effective response to conserve wildlife in environments that have become fragmented by human activities. An ecological network comprises a suite of high quality sites which collectively contain the diversity and area of habitat that are needed to support species and which have ecological connections between them that enable species, or at least their genes, to move. Over 250 ecological networks are being planned or implemented at international, national and regional levels around the world, including in some parts of the UK. Provision for ecological networks is made in a number of international treaties and agreements but England has not yet met its commitments under these agreements. Taking steps to do so, however, will deliver a range of benefits for people as well as wildlife, because of the range of ecosystem services that resilient, coherent ecological networks can provide."            (Lawton et al, 2010, p.V).</p> <p>In Runnymede, natural habitats are under increasing pressure from the cumulative effect of new developments for housing and transport. Direct loss of habitats and fragmentation of biodiversity networks is further exacerbated by the noise, light and air pollution that these developments often bring with them. Runnymede's habitat loss and fragmentation is further exacerbated by the increasing effects of climate change, which impacting species composition and</p>	<p>Noted.</p> <p>Noted. The SA Scoping recognises climate change as an issue/problem for biodiversity as well as protection and enhancement of designated sites, the GBI network and securing Biodiversity Net Gain (BNG). SA Objective 1 also seeks to conserve and enhance biodiversity, habitats, species, ecosystem services and GBI</p>	<p>N/A</p> <p>No.</p>

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	<p>structural dynamics of natural habitats through, for example, the increasing incidence of wildfires, floods, droughts and tree windthrow.</p> <p>However, carefully planned and strategic development in our borough can provide opportunities to increase the protection and integration of biodiversity habitats, creating viable natural networks that also protect us and contribute to our wellbeing. This is why it is particularly important for the Sustainability Appraisal Scoping Report to establish a strong Green/Blue Infrastructure baseline for assessing the impact of the emerging Runnymede 2040 Local Plan.</p> <p><b>The legislative context</b></p> <p>Following our departure from the EU, the UK Government has set out a framework that establishes ambitious environmental targets under the Environment Act 2021. These include the objective to halt the decline in natural species by 2030 and the committed to protect 30 per cent of our land and sea by 2030 ('30 by 30'). A key mechanism to deliver these ambitious targets is the establishment of a Nature Recovery Network (NRN). The aim of the NRN is to increase connectivity through</p>	<p>with decision aiding criteria for the SA including avoiding habitat fragmentation, avoiding net loss of ecological resources and delivery of Local Nature Recovery Strategies. Any information from Local Nature Recovery Strategies can be integrated into future iterations of SA when available.</p> <p>See response above re: GBI baseline</p> <p>Noted. The NRN is a commitment in the government's 25 Year Environment Plan, which is referred to in the list of Plans, Policies &amp; Programmes in Appendix A of the SA Scoping Report. The objectives of the 25 Year Environment Plan are reflected in SA Objective 1 and its decision aiding criteria.</p>	<p>Yes. See above.</p> <p>No.</p>

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	<p>creating and restoring additional habitat including wildlife corridors and stepping stones between existing natural habitats.</p> <p>By 2042, the NRN aims to:</p> <ul style="list-style-type: none"> <li>• restore 75% of protected sites on land (including freshwaters) to favourable condition so nature can thrive</li> <li>• create or restore 500,000 hectares of additional wildlife-rich habitat outside of protected sites</li> <li>• recover threatened and iconic animal and plant species by providing more, diverse and better-connected habitats</li> <li>• support work to increase woodland cover</li> <li>• achieve a range of environmental, economic and social benefits, such as carbon capture, flood management, clean water, pollination and recreation.</li> </ul> <p>It therefore makes complete sense to align NRN's 2042 objectives with the Runnymede 2040 Local Plan.</p> <p><b>What Runnymede Borough Council had done so far on Green/Blue Infrastructure</b></p> <p>One of the documents that begins to engage with the challenge of protecting and enhancing ecological connectivity is RBC's Green and Blue Infrastructure Supplementary Planning Document. The document names the following areas as major contributors to ecological connectivity in the borough:</p> <ul style="list-style-type: none"> <li>• Colne Valley Regional Park blue/green corridor</li> </ul>	<p>Noted, however it is not the role of the GBI SPD to provide detail on the Borough's GBI assets, including those listed as corridors and features. Rather the SPD sets out guidance for developers in how they can best take account of and incorporate GBI into their developments.</p>	<p>No.</p>

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	<ul style="list-style-type: none"> <li>• River Thames &amp; Runnymede Meadows blue/green corridor</li> <li>• Windsor Great Park green corridor</li> <li>• Thames Basin Heath green corridor</li> <li>• Wey Valley blue/green corridor</li> <li>• Basingstoke Canal blue/green corridor</li> </ul> <p>However, beyond naming these corridors, actual locations, width and ecological status of these areas is not explored in detail. In fact, the only indication of where these corridors might lie is provided in a map that is "illustrative only...intended to represent a high level spatial framework for the strategic planning and management of Green and Blue Infrastructure Assets at the local level, The map is based on current available data." (RBC Green and Blue Infrastructure Supplementary Planning Document, p.6) (Figure 3). In order for a meaningful contribution to the strategic planning and management of Green and Blue Infrastructure Assets at the local level, it is imperative that a more detailed analysis is carried out. There is a clear opportunity to include this analysis in the Green and Blue Infrastructure baseline within the Sustainability Appraisal report.</p> <p><b>What Runnymede Borough Council needs to do to improve its Green/Blue Infrastructure plans: Corridor Identification Methodology</b></p> <p>Purpose of the SA is to serve as a benchmark against which the emerging Runnymede 2040 Local Plan, when judged against reasonable alternatives, has the potential to achieve environmental, economic and social</p>	<p>See response above re: GBI Baseline and its accuracy. Whilst SA Scoping can include details of quantity/typology (where accurate) it is not considered the role of SA/SEA to undertake detailed analysis of each GBI asset or corridor, rather this would be for a GBI Strategy or detailed review. The Local Plan could refer to a GBI strategy in policies but is not the document to set this out in detail and neither is it the document to set how GBI should be managed.</p> <p>Noted.</p>	<p>No.</p> <p>N/A</p>

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	<p>objectives as set out by government legislation and policy.</p> <p>The SA will therefore enable the council, Runnymede's communities and other stakeholders to evaluate whether the emerging Runnymede 2040 Local Plan is actually able to direct improvements in environmental, social and economic conditions, and to identify and mitigate any potential adverse effects that the plan might have. The SA can therefore be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. This is why establishing a solid and coherent evidence base in the Sustainability Appraisal's baseline is so important, and why a much stronger Green and Blue Infrastructure baseline needs to be included.</p> <p>Natural England have proposed a methodology for identifying 'Nature Networks' (Natural England, 2020) which could be adapted for the unique characteristics of Runnymede's environs. For example:</p> <p><b>STEP 1 Mapping of existing physical green infrastructure assets</b></p> <p>The process could be started by creating a baseline dataset of existing green corridor assets, such as those listed in the Green and Blue Infrastructure Supplementary Planning Document. This could be achieved by pulling together Geographical Information System (GIS) and online data from RBC Council, Thames Valley Environmental Records Centre, Surrey Wildlife Trust, The Woodland Trust, Natural England</p>	<p>Noted, whilst the SA takes into account the evidence underpinning the plan, it does not test it per se, it tests the Plan as a whole and its policies which should be informed by the evidence. See response above re: GBI Baseline.</p> <p>Noted, however this is considered more appropriate for a GBI or Local Nature Recovery Strategy rather than a SA Scoping Report or Local Plan.</p> <p>Noted. Many of these assets are already mapped, however see response above re: GBI or Local Nature Recovery Strategy.</p>	<p>Yes. See above</p> <p>No.</p> <p>No.</p>

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	<p>and other environmental/conservation organisations. This would cover sites already in existence such as open space, nature reserves, waterbodies and woodland.</p> <p><b>STEP2 Mapping of green infrastructure corridors</b></p> <p>Meetings convening conservation professionals and local wildlife enthusiasts could then be arranged. Participants could be asked to examine maps which included all the data collected from Step 1 and use their local knowledge of land use, land ownership, planning policy and local initiatives, to identify green corridors and networks. These proposed green corridors could then be analysed in terms of their functionality and connectivity. Natural England examined various studies which included definitions of green infrastructure functions and agreed a list of fifteen functions. These combined habitat conservation with compatible public goals such as recreation, flood risk mitigation and environmental health protection. The fifteen functions identified were:</p> <ol style="list-style-type: none"> <li>1. Open space – Contains open space assets such as parks and woodlands;</li> <li>2. Biodiversity – Contains one or more sites of significant wildlife value;</li> <li>3. Landscape – Contains at least one landscape feature worthy of protection or enhancement ;</li> <li>4. Products from the land – Includes areas in agricultural or food production;</li> </ol>	<p>See response above re: GBI or Local Nature Recovery Strategy.</p>	<p>No.</p>

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	<p>5. Mitigating flood risk – Contains floodplain, areas at risk from flooding or areas where green infrastructure could be used to reduce run off into flood risk areas;</p> <p>6. Contribution to mitigating climate change – Contains areas which are, or could be, managed for non flooding climate change mitigation through, carbon sequestration in areas such as woodlands;</p> <p>7. Health – Includes Air Quality Management Areas or locations with populations with poor health where green infrastructure can be used to increase outdoor activity or address pollution issues;</p> <p>8. Accessibility – Contains rights of way allowing access by foot, cycle or horse riding along the corridor;</p> <p>9. Recreation – Contains formal and informal outdoor recreational assets such as golf courses, play areas and sports pitches;</p> <p>10. Education – Visitor centre or site already used for environmental education;</p> <p>11. Cultural – Contains gardens, cemeteries, historic features or buildings with public access;</p> <p>12. Tourism – Includes tourism assets which would form part of at least a day trip for people from outside the immediate area;</p> <p>13. Poor quality environment – Contains existing poor quality environments which could be improved with investment in green infrastructure;</p> <p>14. Land and property values – Areas where investment in green infrastructure would be likely to positively affect local land and property values;</p> <p>15. Economic growth – Includes areas where development is proposed and increased green infrastructure is likely to attract further economic investment e.g. higher value industry.</p>		

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	<p>RBC's approach could adapt and simplify the above functions. For example, biodiversity/habitat aspects (e.g. presence of Local Wildlife Sites, open spaces, including uninterrupted corridors such as streams and railway lines) could be prioritised in that many of the other functions (climate change mitigation, health, education, tourism, property values, economic growth) are directly linked to the presence of spaces of significant wildlife value (see Fisher and Fischenich 2000, Parkyn 2004, Lee et al. 2004).</p> <p>During the meetings, participants could first be asked to see how single functions of green corridors can be linked, for instance connecting conservation areas such as Local Wildlife Sites together into corridors. The second task could be to link multifunctional assets together such as connecting a designated nature area, to a lake, to a woodland, to a recreational site.</p> <p>Participants can also be asked to consider realistic opportunities to increase green infrastructure and connectivity. Corridors could then be defined on maps using physical linear features on the ground such as streams and rail lines and to ensure future legibility (see Spellerberg and Gaywood, 1991, for an excellent analysis of the importance of linear features for defining green corridors).</p> <p><b>STEP 3 Creating a hierarchy of corridors</b></p> <p>The next stage would involve the working group reviewing the green infrastructure corridors they defined in the first meetings in order to:</p> <ol style="list-style-type: none"> <li>1. Check the corridor boundaries</li> </ol>		



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	<p>regional conservation planning, green corridor widths can be identified at 3 levels:</p> <p>Regional Corridors - &gt;500 m in width. These are primary landscape connections providing dispersal for individual species, but crucially, constituting habitats in their own right. This would enable the migration of whole ecosystems during periods of rapid climate change. There is already evidence that, with a warming climate, southern species are migration northwards. If their migration is impeded, then whole ecosystems may go extinct as their original location changes in climate and they are unable to translocate.</p> <p>Sub-regional Corridors- &lt;500m and &gt;300m in width. These may not be large enough to provide substantial species habitat, but ought to be wide enough to cater for species movement and dispersal while not as substantial in width as regional corridors.</p> <p>Local Corridors - &lt;300m in width. These are smaller, less defined linkages that provide local connection of remnant patches of vegetation and landscape features such as streams. They may occasionally be less than 50m in width and as such may be influenced by edge effects. The evidence for establishing the absolute minimum width comes from recommendations for wildlife overpasses and culverts over and/or under major transport infrastructures. For example, one of the first overpasses built in North America is situated in Utah over Interstate 15 south of the town of Beaver. This was built in 1975, is 7.5 meters wide and has considerable evidence of deer migration. Studies in</p>		

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	<p>Europe have recommended a minimum width of 30 m for roe deer (Woess &amp; Grillmayer, online). For small mammals, migration routes as small as 0.3m – 1 m in width are adequate, as long as these stretches are not too long (Clevenger et al. 2001; McDonald &amp; St Clair 2004).</p> <p>The working group should take into consideration this evidence, the current composition of identified green corridors (in small sections, these pass through urban areas) and the political will for supporting green infrastructure. A minimum width of 10m (5m on either side of a waterbody/railway) may prove to be acceptable for target species (such as badgers) while proving politically acceptable.</p> <p><b>Recommendations for Managing Green Corridors in Runnymede which could be included in Neighbourhood Plans</b></p> <p>A strong green corridor policy direction in the Runnymede 2040 Local Plan can then cascade down to a range of actions, including influencing Neighbourhood Plans. For example, the 'Ascot, Sunninghill and Sunningdale Neighbourhood Plan' is ground-breaking in being one of the first Neighbourhood plans to explicitly include green corridor maps and policies (Figure 4 and Box 1)</p> <p>A green corridor strategy could also be championed at Neighbourhood Plan level with the aim of maximising ecological processes and corridor functions for the benefit of wildlife and the local community:</p>	<p>Noted. The SA Scoping Report identifies 2040 Local Plan will require policies for protection &amp; enhancement of GBI network which includes green corridors. This is also reflected in SA Objective 1 and its decision aiding criteria.</p> <p>This will be a matter for Neighbourhood Plans.</p>	<p>No.</p> <p>No.</p>

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	<ul style="list-style-type: none"> <li>• Maintain and increase vegetation cover and habitat quality to maximise connection between larger remnants of habitat. This should include retaining vegetation cover and structure including groundcover, shrub layer and canopy species, and logs on the ground. We especially recommend aggressive enforcement of existing regulations restricting illegal tree felling through Tree Preservation Orders, regulations against the dumping of soil, waste, and refuse in the green corridors, and restricting farming, gravel mining, and building in corridor streams and floodplains.</li> <li>• Where corridors comprise steppingstones of remnant vegetation, management should aim to replace hard boundaries such as brick walls with more permeable boundaries such as hedges, and the enhancement and revegetation of the corridors to increase vegetation cover and make better linkages. This will help dispersal of wildlife populations between larger remnants and ensure genetic interchange and seasonal wildlife movement.</li> <li>• Where possible, alongside the local corridors, protect or restore a continuous strip of native habitat at least 200 m wide along each side of the corridor strip. Buffer strips can protect and improve water quality, provide habitat and connectivity for many species, improve quality of life for neighbourhoods, and increase adjoining property values (Fisher and Fischenich 2000, Parkyn 2004, Lee et al. 2004). Recommended buffer widths to sustain stream and wetland plant and animal communities vary from 30 to 500 m (Wenger 1999, Fisher and Fischenich 2000, Wenger and Fowler 2000, Environmental Law Institute 2003). At a minimum,</li> </ul>	<p>List of bulleted points are not a matter for the SA Scoping Report. Enforcement of existing regulations and management of corridors are largely beyond the scope of the Local Plan.</p>	<p>No.</p>

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	<p>buffers should capture the stream channel and the terrestrial landscape affected by flooding and elevated water tables (Naiman et al. 1993). Wider buffers are needed to protect edge sensitive bird species from nest predation and parasitism. We recommend delineating a buffer that extends 200 m beyond each side of a waterbody corridor.</p> <ul style="list-style-type: none"> <li>• Provide specific habitat resources and ecological needs, particularly for threatened species (e.g. suitable substrate areas for badger sets and nest boxes for bird species);</li> <li>• Maximise corridor function by the control of invasive species such as Japanese Knot Weed, Himalayan Balsam and Cabbage Skunk Weed, and careful management of feral/domestic animals (in the UK, between 55 and 275 million wild animals are killed by domestic cats every year) ;</li> </ul>		
CBRE obo Ashill	<p>Scoping Report includes a comprehensive approach to the Sustainability Appraisal for the purpose of the Local Plan 2040.</p> <p>With respect to the decision aiding framework as set out in Table 15-1, we have the following suggested additions:</p> <p>SA Objective 5 – Add new criteria – Does the proposal avoid the need for development in flood zones 2 &amp; 3?</p>	<p>Noted.</p> <p>SA Objective 5 already has a decision aiding criteria to 'ensure people, property and businesses are protected from Flooding' and therefore the additional criteria is not considered necessary.</p>	<p>N/A</p> <p>No.</p>

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	<p>SA Objective 6 – Amend criteria – Will it <del>avoid</del> <b>provide opportunities</b> to <del>contributing to</del> <b>reduce</b> congestion and reduce travel demand?</p> <p>SA Objective 7 – Amend criteria – Will it help to achieve walkable neighbourhoods <b>with access to local goods and services</b>?</p> <p>Add new criteria – Will it support priority transport projects i.e. A320?</p>	<p>Considered important to ensure that Local Plan growth aims to avoid contributing to congestion and reducing travel demand at the outset, rather than just provide opportunities to reduce congestion.</p> <p>Achieving walkable neighbourhoods will require accessibility to a range of local goods and services and as such it is not considered necessary to explicitly reference this.</p> <p>The A320 transport project will be completed by the time the 2040 Local Plan is adopted and need not be referenced. General support for other priority transport projects (if identified) would need to be assessed against the decision aiding criteria of 'providing opportunities to reduce carbon emissions', 'avoid contributing to congestion and reduce travel demand' and 'achieve walkable neighbourhoods'. Support for a priority transport project does not necessarily render a site or policy more sustainable in SA terms and/or support the objective to reduce greenhouse gas emissions. As such, no change is considered necessary.</p>	<p>No.</p> <p>No.</p> <p>No.</p>

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	<p>SA Objective 8 – Add new criteria – Will it provide homes close to jobs?</p> <p>P67 states '<i>should the 2040 Local Plan release Green Belt for development, allocations will need to be sustainably located, on areas of least environmental quality and have regard for the transition between the urban area and wider landscape</i>'. Both sites promoted by Ashill (Land at Stroud Farm &amp; Land at Xmas Tree Farm) respond positively to this objective and provide opportunities to provide a clearer delineation between the Green Belt boundary and existing built form.</p>	<p>SA Objective 7 decision aiding criteria already include helping to achieve walkable neighbourhoods and this could be tested in SA as access to employment areas based on standard walk times.</p> <p>Noted, however it is not the role of the SA Scoping Report to consider the sustainability or otherwise of promoted sites. This will be considered in later iterations of SA.</p>	<p>No.</p> <p>N/A</p>
Private Individual	<p>1. it covered significant ground and relevant topics</p> <p>2. it does not draw on any lessons learned or successes from the product of the last Local Plan to inform the future - when will that be done?</p>	<p>Noted.</p> <p>SA Scoping Report sets out the sustainability/environmental baseline as it is now using information available at the time of writing. Given that the 2030 Local Plan has only been in place for two years the Council's monitoring of the plan will not yet have picked up on medium/longer trends in policy performance. However, the future baseline scenarios attempt to predict how the sustainability/ environmental baseline will evolve moving forward based on trends/patterns in the</p>	<p>N/A</p> <p>No.</p>

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	<p>3. Could have given more valuable feedback if I had had a briefing on what role this document plays in the Local Plan. Being given a 135 page and fairly dense document with no information to help me how to tackle reading it, leaves me wondering (i) how I can best contribute; and (ii) whether circulating it to the Citizens' Panel is paying only lip service to the practice of doing it. In the future, please could you help me/us be better contributors?</p>	<p>baseline information including with the adopted 2030 Local Plan in place.</p> <p>Noted. The role of SA scoping is to set out the sustainability/environmental baseline for the Borough as it is now and how it might evolve in the future without the 2040 Plan in place. The SA scoping can then pick up on any trends in the baseline and identify issues which the 2040 Local Plan should seek to address (as far as it can) and set out a framework for assessing the sustainability of the 2040 Plan. The Council will be holding a series of public events/exhibitions and consultations over the course of 2040 Local Plan preparation and as such there will be further opportunities to discuss and engage in the Local Plan process including on the Sustainability Appraisal process.</p>	N/A
Egham Residents' Association	<p>The need for development to be "sustainable" (in keeping with the 1987 definition quoted in paragraph 1.1) is the underlying theme of this document. And the Egham Residents' Association (ERA) welcomes the extra stress on this message in planning policy that has come with increasing realisation of the threat to the planet, mankind and all other life forms from global warming.</p>	Noted.	N/A

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	<p>We are sceptical, however, of the extent to which a shift in rhetoric reflects a real change in thinking and awareness of the depth of the problem. Many politicians and policy advisers have become fluent in talking green talk. But how many of them are really ready to do the green walking that will be necessary to avert environmental disaster?</p> <p>We've been asking this about the Surrey 2050 Place Ambition, which talks about "good growth" but also identifies Egham as one of nine primary growth towns in the county and makes little attempt to show how all this growth will be different from the (bad or not so good) growth that has been a feature of the past.</p> <p>Similarly, this "Runnymede 2040" document loses no time in stating that the Local Plan updating will be setting out "Runnymede's growth ambitions over the years 2025-2040".</p> <p>Should there not also be an early acknowledgement in it that the need to counter the threat of global warning may now make economic growth of the type and scale commonly seen in the last century impossible to achieve for some, if not many, years? And should not such a statement be echoing policy statements coming from and beyond Whitehall?</p>	<p>Noted. The SA Scoping Report sets out a series of Objectives in the Sustainability Framework against which future plan policies/sites will be assessed. This includes objectives on climate change and reducing greenhouse gas emissions which may be further strengthened when the final Scoping Report is published.</p> <p>Noted. The Surrey 2050 Place Ambition identifies Egham as a primary centre, however it will be for the 2040 Local Plan to determine growth levels in that area taking account of all available evidence underpinning the plan.</p> <p>Correct. The 2040 Local Plan will set out how much growth can be accommodated in Runnymede over the period 2025-2040 and where this should occur.</p> <p>Appendix A of the SA Scoping Report identifies key messages/objectives from other relevant plans/policies/programmes which have informed the SA Objectives against which the 2040 Local Plan will be assessed. This includes international/national/local plans/policies on climate change. The</p>	<p>No.</p> <p>N/A</p> <p>No.</p> <p>No.</p>

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	<p>ERA has been making it clear over its almost 40 year existence where it stands on the main development issues facing the town. We are proud of our town, its history and its ongoing resolve to defend its character, which frequently involves battles to try to ensure that development is “good” and sustainable.</p> <p>We like to think that this resolve is reflected in the character of the Magna Square development, and we hope that this will be repeated in the plans for ‘Gateway East’ or the Egham Precinct site and other town centre schemes that are set to come forward. We very much welcome the addition of the Runnymede ‘Design Guide’ to the 2030 Local Plan, and we trust that it will in no way be weakened going forward to 2040.</p> <p>Egham’s location makes it highly attractive to developers, but this brings threatened pain as well as gain. Our community often feels under siege as development scheme after development</p>	<p>SA Scoping section on climate also sets out the baseline situation now and how this is likely to evolve in the absence of the 2040 Local Plan (a policy off approach). However, it is not for SA Scoping to assume whether past delivery can or cannot continue into the 2040 Local Plan period, rather this will be for supporting evidence and future iterations of SA to demonstrate.</p> <p>Noted.</p> <p>Noted. The SA Scoping Report section on landscape/townscape highlights that the 2040 Local Plan should include/retain policies for high quality design. The Design SPD will continue to be a material consideration in decision taking.</p> <p>The Council consider all planning applications against the development plan unless material circumstances dictate otherwise.</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p>

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	<p>scheme comes off the drawing board. The word 'sustainable' does not come quickly to mind as some of these proposals are unveiled. We look to Runnymede Council for protection against undesirable and unsustainable development, but we don't always get it (and that's putting it mildly).</p> <p>One of the main - and surely unsustainable - development schemes that would seriously affect Egham and Runnymede is the proposed Heathrow Third Runway. Given the context of global warming it is mind-boggling that this monstrous dinosaur of a project still has some life in it. But it does, and it is stated in this document (paragraph 13.16) that "a third runway at Heathrow Airport may be delivered, significantly increasing the number of air passenger and freight flights with potential for increasing vehicle trips on the local and strategic networks".</p> <p>How can such a sentence appear in a document about sustainable planning against a background of global warming? Shouldn't the document be pointing instead to the obvious contradiction?</p> <p>We would like to see a rail link from Heathrow to Staines (and thereby other parts of Surrey) without a Third Runway. But it seems to us - notwithstanding the hope expressed in this document - that the former is conditional on the latter.</p>	<p>Noted, however the Runnymede Local Plan will have no control over whether airport expansion at Heathrow comes forward or not and as such it is not the role of Runnymede SA Scoping to consider the benefits/disbenefits of this. However, SA Scoping and the 2040 Local Plan cannot ignore the fact that there is still a possibility of expansion coming forward over the Local Plan period and the impacts of this on the Plan need to be taken into account.</p> <p>See comment above.</p> <p>Noted. Southern Rail Access may not be contingent on airport expansion but no decisions on this have been made to date.</p>	<p>No.</p> <p>No.</p> <p>N/A</p>

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	<p>Our objection to further Heathrow expansion is also rooted in concern about pollution from additional aircraft and motor vehicles, and pressure for further widening of the M25.</p> <p>Being based in Egham, where pollution has already led to the establishment of an AQMA (Air Quality Management Area) pushing out from the boundary of the M25, we are somewhat bemused by the statement in paragraph 7.4 of this document that "air quality in Runnymede is generally good".</p> <p>How is this squared with the findings of research conducted by Imperial College, London, which led to a report recently in the Surrey Advertiser (May 6th) that pollution levels in "Egham High Street, close to the M25, were in the 98th percentile... of the most polluted areas in the UK"?</p> <p>We think that section 7 of this document (on "air and noise") generally understates the problems it addresses.</p>	<p>See comments above.</p> <p>Noted, however looking at data from air quality monitoring stations across the Borough, the majority of stations do not report an exceedance of air quality targets/limits. This information is shown in Appendix B, Table B-5 of the Scoping Report.</p> <p>Whilst there is no monitoring station for High Street, Egham, the report notes that NO<sub>x</sub> at the monitoring station at 19 Vicarage Road (adjacent rail crossing) does exceed targets. However, all other monitoring stations in Egham do not exceed limits/targets for NO<sub>x</sub>. The Council's Air Quality Modelling Report for the 2030 Local Plan also shows both NO<sub>x</sub> and PM reducing over time and below limits/targets for air quality.</p> <p>See comments regarding air quality monitoring above. The SA Scoping also identifies air quality as an issue and recommends the 2040 Local Plan allocations should consider impact to and from air quality.</p>	<p>N/A</p> <p>No.</p> <p>No.</p> <p>No.</p>

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	<p>For some years now, facilitating the meeting of housing targets set by Whitehall has been the over-riding purpose of the planning system and Local Plans. In Runnymede this has been possible only through the removal of land from the designated Green Belt. Consequently, Runnymede Council has presided over and consented to the shrinking of the Green Belt from 79pc of the land in the borough to 74pc in just five-six years. This is a truly shocking and damning diminution in such a short time.</p> <p>It has been driven by politicians who sometimes talk about the Green Belt being "sacrosanct" but then show through their actions that it is sacrosanct except when it isn't. If continued, areas of land on the southern edge of Egham will inevitably be extracted from the Green Belt, and eventually the town will coalesce with Virginia Water through Stroude. Drip by drip, that process is already under way.</p> <p>The housing targets for the borough that have led to this are set by means of an algorithm that takes no account of the Green Belt. (So it would be the same as it is now if none of the land in the borough were in the Green Belt.) This is beyond ridiculous; it leaves a choice between cutting into the Green Belt and building</p>	<p>The reduction in Green Belt land from 79% to 74% is a result of the 2030 Local Plan, not a gradual erosion through planning consents over 5-6 years. Until adoption of the 2030 Local Plan the percentage Green Belt in Runnymede has remained static (79%) since the Borough's first Local Plan in 1986, which confirmed Green Belt extent from the Surrey Development plan of 1958.</p> <p>Noted, however the NPPF sets out that Green Belt designation can be removed in exceptional circumstances, which was proven at the 2030 Local Plan examination. The Council's Green Belt review identified areas of land which did not perform strongly against Green Belt purposes and which could be released from development. This took account of Green Belt purposes such as avoiding the coalescence of settlements and encroachment into the countryside/sprawl.</p> <p>Runnymede's housing need is derived through a standard methodology set by government.</p>	<p>No.</p> <p>No.</p> <p>No.</p>

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	<p>upwards; and politicians of all stripes ought to be protesting and demanding change. Instead, all too often, they roll over and give in.</p> <p>At long last, change on this front is in the air. There has been talk at Westminster of the abandonment of central housing targets. So far, however, there has been little clarity. So, given the paramount importance in the planning system of meeting housing targets, how can RBC at this time even start the process of reviewing the 2030 Local Plan? Aren't its planners operating in a dense fog? * (See addendum below. It seems to us that the statements attributed to Housing and Communities Secretary Michael Gove by his Cabinet colleague Kwasi Kwarteng are potentially of considerable significance in the process of reviewing the Runnymede 2030 Local Plan.)</p> <p>This is not the only major housing/planning problem. Many Egham residents have offspring who would love to live here but cannot afford to. Rather a lot of one-bedroom accommodation has been built in the town in recent years, but hardly any of it has been constructed for or is affordable to would-be first-time buyers brought up locally. They are not helped by the charging of over £350 a week for 'luxury' one-bedroom accommodation.</p> <p>We are aware, of course, that the Rusham Park 'student village' should help considerably towards easing this problem. It can reasonably be expected too that a significant number of student HMOs will revert to being family homes, and this is something else that needs to be properly addressed in the updating of the</p>	<p>Local Authorities must now review their plans every five years from the date of adoption of the last plan. As such, Runnymede must complete the review of the plan (including time for consultation and examination) by 2025.</p> <p>Noted, however the 2030 Local Plan expects sites of 10 more units to deliver 35% of those units as affordable. The SA Scoping Report highlights the affordability of housing as an issue which should be addressed in the 2040 Local Plan.</p> <p>The Council's housing need evidence base will be updated as part of the Local Plan review and will take account of the need for student accommodation. The 2018 SHMA identifies that 70% of new market</p>	<p>No.</p> <p>No.</p> <p>Yes. Identify mix of housing delivery as an issue.</p>

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	<p>Local Plan. Runnymede Council's 2018 SHMA Update document showed that in 2016-36 approximately 65pc of the additional homes required are 3 bedroom or 4-bedroom. We have no figures for the actual percentage achieved so far in the Egham area, but it can be nothing like that. Further to this, Runnymede Council must seriously amend, if not scrap the "students" part of Policy SL23 in the 2030 Local Plan; it is horribly laissez faire and can be summarised as "More off-campus student accommodation: bring it on!" This policy has much to answer for.</p> <p>As is highlighted in this document, Runnymede is fortunate in having a thriving economy with a very low unemployment rate. Here in Egham, however, a number of office buildings – including Prestige House and Centrum House - have been converted in recent years to flats. This trend reflects a shift to working from home and will have been exacerbated by the Covid outbreak. But it needs monitoring in case it becomes a concern and there should be some acknowledgement of this in the Local Plan review.</p> <p>Policies for keeping a close eye on the High Streets in the borough, including Egham's, are also needed. Magna Square has given Egham's town centre new hope, and we have the promise of Gateway East to come. But there is the danger of an underlying continuing decline.</p>	<p>units should be 3 &amp; 4 bed housing, but also 75% for 2 and 3 bed units. The Council's latest monitoring data (2021 Annual Monitoring Report) shows 64% of all housing delivered since adoption of the 2030 Local Plan as 2 &amp; 3 beds and 19% as 3 and 4 beds. 100% of affordable delivery has been 1 &amp; 2 bed units where the target is 65% and 30% for 3 bed units. This can be highlighted as an additional issue in the SA Scoping Report. The Local Plan review may consider reviewing Policy SL23.</p> <p>The conversion of Prestige House and Centrum House were consented under permitted development and this is highlighted as an issue in the SA Scoping Report. The Council undertakes regular monitoring of its employment floorspace as is set out in the Annual Monitoring Report. Further information on employment floorspace monitoring will be added to SA Scoping.</p> <p>Noted. The SA Scoping identifies the vitality/viability of the Borough's Town Centres as an issue and that the 2040 Local Plan should include/retain policies to consolidate vitality/viability and improve attractiveness.</p>	<p>Yes. Add information on employment floorspace monitoring.</p> <p>No.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>This document offers little comfort to Egham on the issue of flooding, though it poses a big risk not least because of the cutting back of the River Thames Scheme - and we find this most unsatisfactory and perplexing.</p> <p>Similarly, it distances itself from the subject of gravel-raising though the Egham area is very much threatened by it. This too is unacceptable. Runnymede Council should be very much involved in the struggle to stop gravel-raising at Whitehall Farm and Milton Park Farm, and should be supporting the proposal to ban all such activity within a kilometre of residential property or schools.</p> <p>A hands-off stance on these issues is thoroughly out of place in a document proclaiming a much better approach to the sustainability of development. It is not, as it were, sustainable.</p> <p>Since this response was written and sent in its original form to RBC, we have learned that Cabinet Minister and Spelthorne MP Kwasi Kwarteng has had a further</p>	<p>SA Scoping raises flood risk as an issue and recommends 2040 Local Plan include/retain policies to ensure NPPF sequential approach to flood risk is followed, give support to the River Thames Scheme and ensure development is resilient to climate change impacts.</p> <p>The issue of allocating or controlling development for gravel/mineral extraction is beyond the scope of the 2040 Local Plan being a matter for the Minerals &amp; Waste Plans prepared by Surrey County Council who are the consenting authority for such schemes. Nevertheless, Runnymede will continue to make representations to the County Council in it's review of mineral policies and sites and on individual applications when they come forward.</p> <p>See comments above.</p> <p>Comments are noted, however there has been no change (to date) in the approach to meeting housing requirements as set out in the NPPF.</p>	<p>No.</p> <p>No.</p> <p>No.</p> <p>N/A</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>discussion with Michael Gove, the Housing, Communities and Local Government Secretary.</p> <p>Following this, Mr Kwarteng sent an email to Spelthorne councillors that concluded:</p> <p><i>I have now had a very constructive meeting with Mr Gove. I can confirm that Mr Gove again stressed to me that Councils can decide their own housing requirement once they have considered their ability to meet their own needs in their area. This includes taking local circumstances and constraints into account, and the Secretary of State is aware of the constraints of the Green Belt and reservoirs in our Borough. Councils must adopt a sound plan, which as well as being effective and consistent with national policy should also take the views of local people into account.</i></p> <p>I hope that this confirmation that Councils can decide their own housing requirement is helpful.</p>		
Environment Agency	<p><b>Relevant Plans and Programmes and Sustainability Objectives/Key Messages</b></p> <p>Appendix A have listed the Relevant Plans and Programmes which should be regarded in preparing the local plan. As Runnymede is also within the River Thames catchment, the Thames Abstraction Licensing Strategy (<a href="http://publishing.service.gov.uk">publishing.service.gov.uk</a>) should be included in the list of Relevant Plans and Programmes. Other action plans in regard to Biodiversity and Fisheries should be considered as relevant plans and programmes.</p>	Noted. Thames Abstraction Licensing Strategy to be added to list of plans, policies & programmes.	Yes. Add Thames Abstraction Licensing Strategy.

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p><b>Problems and issues</b>  Agree with the environmental problems/issues (particularly regarding our remit - biodiversity, land and soil, water, air and noise, climate, material assets, waste as listed in Table 3-2) that have been highlighted and which the 2040 Local Plan could help to address.</p> <p><b>SEA Objectives</b>  We have reviewed the objectives and the associated decision aiding criteria listed in Table 15-1 and we consider the biodiversity, land and soil, water, air and noise and climate objectives, acceptable. It will be useful to include objectives for Waste and Material Assets which promotes waste reduction and the re-use of resources to minimise the use of natural resources Runnymede. Appendix 1</p> <p><b>Baseline Information</b>  We consider the baseline information sources listed for the following factors; biodiversity, land and soil, water, air and noise, climate, material assets, waste to be satisfactory. If the local planning authority require any further information such as on flood risk from the Environment Agency, please contact us. It is stated in Table 6.3 that Runnymede is in an area of serious water stress as well as has waterbodies deteriorating due to ecological/chemical problems, it is therefore important to also refer to the Wey and Thames abstraction licensing strategies.</p> <p><b>Framework and assessment – section 15</b>  It is stated in section 15 that 'The sustainability framework is a decision aiding tool to ensure the</p>	<p>Noted.</p> <p>Noted. Decision aiding criteria under SA Objective 3 can be amended which promotes waste reduction and re-use of resources.</p> <p>Noted. Thames abstraction strategy to be added to list of plans, policies and programmes. Wey abstraction strategy is already included in Appendix A of SA Scoping Report. Both can be referenced in Table 6-3.</p> <p>Noted.</p>	<p>No.</p> <p>Yes. Amend decision aiding criteria in SA Objective 3.</p> <p>Yes. Add Thames Abstraction Licensing Strategy and reference in Table 6-3.</p> <p>N/A</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>consistent appraisal of Local Plan policy options, policies, allocations and other elements which make up the plan.'</p> <p>It will be useful to see an assessment framework for the sites that will be allocated in the local plan in the Environmental Report. This work is necessary anyway for assessing the sites early on that will be suitable for various development types within the local plan.</p> <p>It will also be useful for the framework to clearly outline the likely significant effects on the environment from these topics, biodiversity, fauna, flora, soil, water, air, climatic factors, material assets. These effects should be graded, for example, into, positive, neutral, and negative effects.</p> <p><b>Monitoring</b> We are happy to note in section 16.3 that 'A framework (which is linked to the objectives in the SA/SEA) for monitoring the significant effects of the 2040 Local Plan will be proposed in the SA/SEA at Issues &amp; Options stage.'</p>	<p>The same Assessment Framework (SA Framework) will be used to consider the effects of potential site allocations. Each potential site allocation / policy will be scored from double negative through to double positive on the basis of the criteria listed in the scoping report.</p> <p>See above.</p> <p>A monitoring table will be presented in the environmental report containing a series of monitoring parameters for each of the sustainability objectives.</p>	<p>No.</p> <p>N/A</p> <p>N/A</p>
Historic England	Content that the Scoping Report for the Runnymede Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.	Noted	No.
Lichfields obo Thorpe Park	Thorpe Park Resort welcomes the recognition in the SA of the Resort's position as a main tourist attraction within the Borough and the need for the Local Plan	Noted.	No.

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>Review to support enhancing the tourism offer within Runnymede. Thorpe Park Resort is a unique attraction in the Borough due to its function as a theme park with associated hotel accommodation and its location. This unique position requires a unique solution in terms of how policy assesses and guides development at the Resort, including flood risk, when considering new development at the site. We note that the draft SA recognises in Table 6-3 that a review of the Strategic Flood Risk Assessment should inform the Local Plan Review. Thorpe Park Resort supports this and encourages the Council to consider a bespoke policy or policy approach to flood risk at Thorpe Park Resort.</p>		
Private Individual	<p>Firstly, concerning that the comments regarding global warming and achieving net zero are not forceful and dynamic enough. For example, there is no reference to working towards increasing the insulation in new builds, so that retrofitting doesn't have to take place at great expense.</p> <p>The horror of Heathrow airport expansion is barely mentioned, with the increase in emissions that that would entail, no matter what the airport claims. And how exactly is the council going to encourage people to use</p>	<p>Noted. However, the role of the Scoping Report is to set out the existing baseline and how this may evolve in the future in the absence of the 2040 Local Plan. Nevertheless, the Council may include further decision aiding criteria for SA objectives that seek to strengthen assessment of policies/sites against climate change impacts. The energy performance of new buildings is controlled through the Building Regulations, although the Council may consider this issue further through the Local Plan Review.</p> <p>The potential expansion of Heathrow Airport is beyond the scope of the 2040 Local plan to control. However, reference is made in the SA Scoping</p>	<p>No.</p> <p>No.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>buses, trains, bikes and walk? They should be doing much more now - for example the new development in Egham has no new cycleways to it round the main road, nor has the junction turning right to the stations been altered to make it safe for bikes. If this apathy is indicative of how the council thinks and works now, why will a new document saying all the right things make them any more progressive?</p> <p>As to the comments regarding preserving the green belt where possible, and protecting the natural world, again I will believe that when I see it. For example, a hotel in Englefield Green in the green belt has been greatly enlarged, and four houses have been built extra to the planning permission which the developer is now applying for retrospective permission. These are tree houses, which must have a detrimental impact on wildlife, as must the large lights all along the entrance for which retrospective permission was also obtained. This developer has influential friends and is a party donor, which I would love to think has nothing to do with the above leniency. So maybe you can see why I would like this document to be innovative, with ideas as to how the council could achieve the goals.</p>	<p>Report to potential expansion and the Local Plan will need to take account of this.</p> <p>The SA Scoping Report identifies that car use and journeys are an issue and that the Local Plan should promote sustainable patterns of development and improve the attractiveness and connectivity of active and sustainable forms of travel to maximise travel choice. The Council is also working with Surrey County Council to deliver a walking/cycling strategy for the Borough.</p> <p>The SA Scoping highlights protection and enhancement of protected sites and green/blue infrastructure as an issue as well as securing biodiversity net gain and recommends including/retaining policies to ensure this. The SA Objectives also seek conservation/enhancement of biodiversity, habitats, species, ecosystem services including green &amp; blue infrastructure. No decision has been taken at this stage of plan making as to whether further areas of Green Belt should be released for development. Should it be the case that further release is proposed, the SA Scoping recognises that the Local</p>	<p>No.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
		<p>Plan should ensure release is sustainably located and on areas of least environmental quality.</p> <p>In terms of the hotel in Englefield Green, it is not the role of the SA Scoping Report to comment on the merits/impacts of individual planning applications.</p>	
Private Individual	<p>As a member of your Citizens' Panel, I'm pleased to have the opportunity to comment upon the above Local Plan (LP). Here I shall confine my comments to just three important topics: air quality, flooding and gravel quarrying. A definition of sustainable development is helpfully given early in the document (LP paragraph 1.1): "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs".</p> <p><b>Air pollution in Runnymede</b>  Quote from the current issue of the local newspaper: "Surrey towns top the table for air pollution" on page 7 of the Runnymede &amp; Spelthorne Edition of the Surrey Advertiser, Friday May 6th. Egham High Street is in the 98th percentile of the most polluted areas in the UK. This comes from a study made by Imperial College London, which demonstrates that even rural parts of the County are exposed to dangerously high toxicity. The pollutants in question are fine particulate matter (PM2.5 and PM10) and nitrogen dioxide (NO2). These pollutants are hazardous to human health; and clearly tackling this serious problem in Runnymede should have the highest priority.</p>	<p>Noted, however the SA Scoping Report is not the Local Plan. The SA Scoping Report sets out the sustainability/environmental baseline for the Borough and how this may evolve in the future in the absence of the 2040 Local Plan as well as setting the framework for how the 2040 Local Plan will be assessed in future iterations of SA.</p> <p>Noted, air quality monitoring stations are located across the Borough for NOx. The majority of stations do not report an exceedance of air quality targets/limits and this information is shown in Appendix B, Table B-5 of the Scoping Report.</p> <p>Whilst there are no monitoring stations for High Street, Egham, the report notes that NOx at the monitoring station at 19 Vicarage Road (adjacent rail crossing) does</p>	<p>N/A</p> <p>No.</p>

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	<p>The Clean Air Strategy of the Department for Environment, Food and Rural Affairs (DEFRA 2021) is to reduce PM2.5 concentrations across the UK (LP page 100 of Appendix A). The World Health Organization (WHO) guideline level is 10 µg/m3. The aim is to reduce by 50% the number of people living above this level by 2025.</p> <p>The National Planning Policy Framework (NPPF 2021) is quoted (in LP paragraph 7.18, Table 7-3; and, again at LP page 101 of Appendix A): "preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution".</p> <p>Regarding both air and noise pollution, Sustainability Objective (SA) 6 (at LP paragraph 15.3, Table 15-1) asks the question, "Will it [a development proposal] ensure that development minimises exposure to poor</p>	<p>exceed targets. However, all other monitoring stations in Egham do not exceed limits/targets for NOx. The Council's Air Quality Modelling Report for the 2030 Local Plan also shows both NOx and PM reducing over time and below limits/targets for air quality. Nevertheless, the SA Scoping identifies air quality as an issue and recommends the 2040 Local Plan allocations should consider impact to and from air quality.</p> <p>Noted.</p> <p>Noted.</p> <p>The role of SA Objectives and their decision aiding criteria is not to assess individual planning applications, but is a tool to assess how Local Plan options/policies and</p>	<p>N/A</p> <p>N/A</p> <p>No.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>air quality and noise pollution; and does not add to air/noise pollution in the wider area?"</p> <p>Any planning application for a proposed development or activity which adds to air pollution near people should therefore be rejected.</p> <p><b>Flooding in Runnymede</b></p> <p>The River Thames Scheme (RTS) receives only a brief mention (LP paragraph 6.16) and yet it will have a profound impact on fluvial flooding in Runnymede. As a separate parallel channel, it will make a massive improvement to the sustainability of living near the Thames and its tributaries; and help to combat the adverse effects of climate change. Residents will remember the devastating floods in recent years (e.g. 2013/2014) which rendered them homeless for months and even years. Warmer wetter winters and heavier summer downpours will increase the risks of flooding (LP paragraphs 6.22 and 8.3). Parts of Runnymede Borough are also at serious risk of groundwater flooding.</p> <p>Sustainability Objective (SA) 5 (at LP paragraph 15.3): To increase resilience to climate change, including flood risk: "Will it ensure that people, property and businesses are protected from flooding?"</p> <p>NPPF (para 159) is quoted at LP page 104 of Appendix A: "Inappropriate development in areas at risk of flooding should be avoided by directing development</p>	<p>potential allocations perform in sustainability terms. It will be the Local Plan which sets out the policies against which planning applications will be considered (having itself be assessed through the SA process).</p> <p>Noted. Reference is made to the River Thames Scheme in the SA Scoping Report, particularly in the current baseline and future baseline for 'water'. The SA Scoping also highlights flooding as an issue and recommends that the 2040 Local Plan includes/retains policies which ensure the NPPF sequential approach to flood risk is followed, sustainable drainage is sought and gives support delivery of the River Thames Scheme.</p> <p>Noted.</p> <p>Noted, again however it is not the role of the SA Scoping to make decisions</p>	<p>No.</p> <p>N/A</p> <p>N/A</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". Planning applications which increase the risk of flooding should be rejected.</p> <p><b>Gravel quarrying in Runnymede</b></p> <p>There are current proposals, from Hanson and Cemex, to quarry sand/gravel at Milton Park Farm and at Whitehall Farm, respectively. In addition, an aggregates recycling facility is proposed by Hanson at Milton Park Farm, close to a primary school. (These sites are mentioned at LP page 108, quoting the Surrey Minerals Plan Primary Aggregates Development Plan Document 2013 and the Surrey Aggregates Recycling Joint DPD 2013.)</p> <p>Quarrying sand/gravel at Milton Park Farm or Whitehall Farm could seriously interfere with both the containment of flood water and the flow of groundwater, leading to an increase in flood risk. This is another significant consideration for refusal of these two planning applications. In addition to loss of air quality and greater risk of flooding, other constraints include excess numbers of heavy goods traffic on minor roads and at level-crossings; and unacceptable noise in proximity to houses.</p> <p>Alternative sources of sand/gravel are the River Thames Scheme (RTS) and imports from outside the County.</p>	<p>on individual planning applications. This will be the role of the Local Plan.</p> <p>Noted.</p> <p>The issue of allocating or controlling development for gravel/mineral extraction is beyond the scope of the 2040 Local Plan being a matter for the Minerals &amp; Waste Plans prepared by Surrey County Council who are the consenting authority for such schemes. The County Council will however need to take account of the environmental impacts of such schemes in their plan making and decision taking capacity. Nevertheless, Runnymede will continue to make representations to</p>	<p>N/A</p> <p>No.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>Bearing in mind the long distances that fine particulate matter (especially PM2.5) can travel; a general working rule for sustainability should be imposed: "No planning application for quarrying minerals closer than 1 kilometre (5 furlongs) from residential dwellings or schools will be granted".</p>	<p>the County Council in its review of mineral policies and sites and on individual applications when they come forward.</p>	
Private Individual	<p>Reassuring to read that population numbers by age are largely dissimilar to previous census, with large working age group.</p> <p>Concerns are based around increasing the population further, by building such a large quantity of new housing and the suggestion that this should be sensitively balanced with using green belt. This is never possible and as stated in the policy, green belt and recreational land is invaluable to a healthy society.</p> <p>Stated in the policy that there has been a massive rise in the amount of private vehicles on the road. As a result, the amount of pollution is increasing chiefly from car fumes with 2 busy motorways passing through also. How does the council intend to improve the congestion already being overwhelming, when considering building so many new dwellings? The existing highways are already in miserably poor repair, which is further</p>	<p>Noted. Scoping report will be updated to include Census 2021 population data which may reveal different projections/age structure to that currently presented in the draft Scoping Report.</p> <p>Noted, however the SA Scoping does not make any decisions on whether land in the Green Belt should be released for development, but recognises that if it is, this is an issue and any release should ensure it is sustainably located, on land of least environmental value and has regard for the transition between the urban area and wider landscape.</p> <p>SA Scoping does not set policy. The SA Scoping reveals that most journeys to work in Runnymede are made by car and this has increased by 3% between 2011 and 2020. The SA Scoping identifies high levels of journey by car as an issue and recommends the 2040 Local Plan</p>	<p>No.</p> <p>No.</p> <p>No.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>exacerbated by heavy traffic and constant digging to add further facilities for new homes.</p> <p>Flora and fauna - most species of plant and animal is declining, how on earth will a larger population, reduction on green belt land, more pollution help this?</p> <p>It is mentioned about supplying support services for a larger population, however whilst primary and secondary care do not fall necessarily under local government remit, there is no mention of it. The provision is inadequate currently at best and with more people, traffic, pollution, overcrowding one would expect this to deteriorate. This is exacerbated by a poorly paid workforce (no London weighting) paying London prices to rent or buy. I am assuming however there is local government input in social care though which also suffers the same.</p>	<p>includes/retains policies which support highway improvement schemes and improving the attractiveness and connectivity of active and sustainable transport infrastructure as well as delivering sustainable patterns of development to maximise travel choice and reduce travel demand.</p> <p>SA Scoping recognises the importance of conserving and enhancing biodiversity as an issue and recommends Local Plan policies include/retain policies to protect designated sites for nature conservation, priority habitats and the green/blue infrastructure network as well as securing biodiversity net gain.</p> <p>The Council will be updating its infrastructure evidence base in due course which will include information in the existing capacity and future requirements for primary/secondary healthcare. However, the provision of such services are beyond the scope of the 2040 Local Plan and it is for health providers to acknowledge the growth coming forward in Local Plans and factor this into their forward plans. Surrey County Council are responsible for provision of social</p>	<p>No.</p> <p>No.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>People using cycles will inevitable diminish due to lack of safe roads to ride on.</p> <p>It is clear that Runnymede is more densely populated than Surrey and England generally, so my question still remains as to why the area needs to be made more unpleasant to live in.</p>	<p>care and as with other health providers need to factor Local Plan growth into their forward plans.</p> <p>See comments above re: car journeys.</p> <p>Noted, however, the Council has to plan to meet the housing and other development needs of the Borough, balancing this against the need to protect the environment.</p>	<p>No.</p> <p>No.</p>
National Highways	<p>Welcome recognition for 'Surrey's 2050 Future Place Ambition' to safeguard employment land and premises within town centres where they are close to sustainable transport (Table 2-12: Issues/Problems for Economy &amp; Employment), which will help reduce reliance on journeys by private car, especially single occupancy trips.</p> <p>We note the comment (Future Baseline para 13.10) that transport evidence which supported the 2030 Local Plan showed that the growth set out in the 2030 Local Plan caused issues to arise on the A320. We are working closely with Surrey County Council to facilitate delivery of A320 scheme which includes improvements to M25 Junction 11.</p> <p>We also note recognition that the high levels of car ownership in Runnymede are likely to continue into the future and that the 2040 Local Plan will need to ensure continued support for highway projects which improve traffic flow at identified hotspots through updates to the</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted and support welcomed.</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>IDP and including/retaining policies for infrastructure delivery. It further states that the 2040 Local Plan should support strategies and projects which aim to improve the connectivity and attractiveness of active and sustainable transport infrastructure in Runnymede and that the 2040 Local Plan will need to ensure it delivers sustainable patterns of development to maximise opportunities sustainable travel choices. We support the approach towards more sustainable infrastructure and focusing development around sustainable travel options.</p>		
Natural England	<p><b>Relevant Plans and Policies</b>  Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;</p> <ul style="list-style-type: none"> <li>• Green infrastructure strategies</li> <li>• Biodiversity plans</li> <li>• Rights of Way Improvement Plans</li> <li>• Shoreline management plans</li> <li>• Coastal access plans</li> <li>• River basin management plans</li> <li>• AONB and National Park management plans.</li> <li>• Relevant landscape plans and strategies.</li> </ul> <p><b>Key sustainability issues and objectives</b>  With regards to the topics of particular relevance to our remit, we welcome that the following have been scoped into the report and that SA objectives 1, 3, 4, 5, 6 and 7 address these topics:</p> <ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Designated sites</li> <li>• Green/Blue Infrastructure</li> </ul>	<p>Noted. Plans relating to these topics have been included in the list of plans, policies and programmes where available and applicable. Surrey Rights of Way Improvement Plan to be added.</p> <p>Noted.</p>	<p>Yes. Add Surrey Rights of Way Improvement Plan to list of PPPs.</p> <p>N/A</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<ul style="list-style-type: none"> <li>• Land and Soil</li> <li>• Water</li> <li>• Air and noise</li> <li>• Climate</li> <li>• Landscape</li> </ul> <p><b>Designated sites</b> At this stage we cannot identify which particular designated sites may be significantly affected by the Local Plan but we suggest that the following designations, amongst others, are taken in to consideration when creating any future site allocations:</p> <ul style="list-style-type: none"> <li>• Site of Special Scientific Interest (SSSI);</li> <li>• Special Area of Conservation (SAC);</li> <li>• Special Protection Area (SPA);</li> <li>• Ramsar Site;</li> <li>• National Park;</li> <li>• Area of Outstanding Natural Beauty;</li> <li>• Heritage Coast; and</li> <li>• Site of 20 ha or more of best and most versatile agricultural land.</li> </ul> <p>Natural England understands that a Habitat Regulation Assessment will be undertaken for the Runnymede Local Plan. This should address the protection of relevant designated sites, including those listed above. The outcomes of this assessment should also inform future versions of the SEA.</p> <p><b>Evidence Sources</b> Please see the pdf attached to this email as 'Local Plan Evidence Sources' for our advice on sources of local plan evidence on the natural environment.</p>	<p>Noted.</p> <p>Noted. Confirm that Runnymede Borough Council will be undertaking HRA of the Local Plan.</p> <p>Noted.</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p><b>Monitoring and indicators</b> As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).</p> <p>The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p> <p>Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> <li>• Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.</li> <li>• Percentage of major developments generating overall biodiversity enhancement.</li> <li>• Hectares of biodiversity habitat delivered through strategic site allocations.</li> </ul> <p>Landscape:</p> <ul style="list-style-type: none"> <li>• Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact.</li> </ul> <p>Green infrastructure:</p>	<p>Noted. Monitoring for the current Local Plan includes indicators for biodiversity under Objective 9 of the 2030 Local Plan.</p> <p>Noted. Future iterations of SA will set out significant effects monitoring and will take into account the examples given by Natural England where feasible.</p>	<p>N/A</p> <p>N/A</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<ul style="list-style-type: none"> <li>• Percentage of the city's population having access to a natural greenspace within 400 metres of their home.</li> <li>• Length of greenways constructed.</li> <li>• Hectares of accessible open space per 1000 population.</li> </ul>		
Private Individual	<p><b>CONTENT</b>  <b>1.1 Errors and omissions regarding New Haw</b></p> <p>Figure 3-1: Location of Ramsar, SPA and SAC does not reflect the Runnymede Borough maps which show that the area is within the Thames SPA , the SSSI (EE9) Impact area relevant to the Basingstoke Canal encompasses a large part of New Haw (see RBC Map below).</p> <p>Whilst the report state that the south of the borough is bounded by the Basingstoke canal it omits to say that it is only part of the southern boundary and in fact the main river the Rive Ditch runs under the Basingstoke Canal and re-emerges running parallel to the Addlestone side of the mainline railway between the Wey Navigation and Byfleet and New Haw station.</p> <p>The Rive Ditch have been flooding properties in Byfleet Road and Fairwater Drive since 2015 on an annual basis, the most recent being August 2021. Not only do properties get flooded from the river, the field is waterlogged throughout the year due to a very high</p>	<p>Figure 3-1 shows all SPA, SAC and Ramsar sites within or adjacent the Borough. The whole of Runnymede does not lie within the TBH SPA, although areas do lie within the 400m-5km buffer zone and SSSI impact areas although these are not a bar to development and not shown on Figure 3-1. Location of SSSI in the Borough have been omitted from Figure 3-1 in error and will be added.</p> <p>Noted. SA Scoping can be amended to reference southern boundary being part formed by the Rive Ditch.</p> <p>Section 6 of the SA Scoping Report sets out the baseline of the water environment in Runnymede. Map 6-2 in the Scoping Report identifies all areas of the Borough at risk from</p>	<p>Yes. Update Figure 3-1</p> <p>Yes. Update para 6.1 to refer to Rive Ditch.</p> <p>No.</p>

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	<p>water table, only 0.6m below the surface. The woodland on it should probably be described as wet woodland. No mention of this is made in the section on Flooding, and Table 6-3: Issues/Problems for Water must include and assessment of the land between Byfleet Road, New Haw and the Wey Navigation and the Rive Ditch.</p> <p>Also omitted from the report related to Air Quality is the fact that for a number of years until the summer of 2021, following a request to Environment Health, there had been no diffusion tubes located in Byfleet Road. Since the increasing volume of traffic on the A318, the proximity of the railway and the M25 elevated section, air quality including dust and particles has been a problem. Data from the diffuser tube now located at the junction of Byfleet Road and Westfield parade must be taken into consideration when assessing traffic and air pollution. There has also been no account taken of the impact of traffic beyond Addlestone Town Centre AQMA. The A318 continues south from Addlestone town centre and takes virtually traffic shown north to</p>	<p>fluvial flooding including the area affected by the Rive Ditch. The issues and problems identified in section 6 include that 'extensive areas of the Borough are likely to remain at highest risk from flooding' and recommends the Local Plan include/retain policies to implement the sequential approach to flood risk and support the River Thames Scheme. As such, it is not considered necessary or reasonable for a strategic level assessment such as SA Scoping to identify every pocket of land that may be at risk from fluvial flooding when this is covered by the issue and recommendation for the whole Borough.</p> <p>Noted, however SA Scoping can only set out the baseline environment based on available data sources. These have been shown in Table B-5 in Appendix B of the Scoping Report which shows the locations and data from all Runnymede diffuse tube monitoring since 2016 and as such data beyond the AQMA in Addlestone has been taken into account where it is available. Reference to the diffuser tube at Byfleet Rd/Westfield Parade is noted and to date no exceedance of air quality targets have been recorded</p>	<p>Yes. Add reference to monitoring at Byfleet Rd/Westfield Parade.</p>

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	<p>south on the Map 7-2: Extent of Addlestone AQMA and takes it via Brighton Road, New Haw Road and Byfleet Road, where there is congestion and the one-way bridge - this road is heavily used by the emergency services on a daily basis. These roads are increasing exponentially with the approvals for new and enlarging vehicle generating businesses in this area of South Runnymede and adjacent business in Elmbridge and Woking.</p> <p>Currently there are applications for the extension of excavation at Addlestone Quarry Byfleet Road, (200 HGV movements a day), an application for warehousing and distribution development on the Greenfield site between (Byfleet Road A3i8) and the Wey Navigation (200 Vehicles a day). SCC has recently granted an application for a waste Transfer station (200 vehicles a day) off Oyster Lane (Change of name from Byfleet Road A318 at the railway bridge)</p> <p>Since 2019 additional traffic has occurred on the A318 between Addlestone and the A245 due to increased</p>	<p>at this station. This will be added to the SA Scoping. The Council also undertook a Borough wide Air Quality Assessment as part of its evidence to support the 2030 Local Plan. This assessment identified that air quality should improve over time (with adoption of the 2030 Local Plan) and is referenced in the SA Scoping Report future baseline for Air &amp; Noise. In terms of traffic levels, the Council will undertake further transport modelling work as part of the evidence to support the Local Plan review which will take account of existing traffic levels including the impact of recent planning approvals and any planned growth proposed in the 2040 Local Plan.</p> <p>See comment above.</p> <p>See comment above.</p>	<p>No.</p> <p>No.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>volumes of traffic from Ocado, Tesco, Amazon, Hermes, FedEx and others who have distribution centres within the Byfleet and Brooklands industrial estate adjacent to the Runnymede Boundary. These volumes of traffic must be taken into consideration in the new Plan</p> <p>Regarding Climate change, in Section 8 on Climate Change there is no mention in either here or in the air quality section about the beneficial use of green areas for absorbing greenhouse gases - this needs to be considered especially when development of green belt or greenfield sites is proposed.</p> <p>A clear area where Runnymede could benefit from employing this type of climate improvement would be the land between Byfleet Road and the Wey Navigation - instead of developing the site it could be cultivated to anything from a peat bog to a wetlands centre, making good use of the already wet woodland areas and high water table which is prone to both flooding from the Rive Ditch and pluvial flooding from the high water table</p> <p>Section 9 contain an error at 9.5 and should read</p> <p>9.5 The major local highways within the Borough and wider area include the A30 London Road which runs from the Meadows Gyrotory in Camberley to Staines.  <a href="#">The A320 links Woking with Junction 11 of the M25 and St Peter's Hospital. Junction 11 also links via the A317 Weybridge and from the first roundabout on the A317</a></p>	<p>Noted, however the role of SA is to set out the current environmental baseline and how this may evolve in the future in the absence of the 2040 Local Plan. However, reference can be made to the benefits of green infrastructure for carbon capture and urban cooling.</p> <p>Noted, however the use of the Byfleet Road site is be a matter for the 2040 Local Plan not the SA Scoping Report.</p> <p>Reference to the A318 can be added to the SA Scoping para 9.5, however the level of detail suggested is not considered necessary.</p>	<p>Yes. Add benefits of green infrastructure on climate change.</p> <p>No.</p> <p>Yes. Add A318 to para 9.5.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<p>also links via the A318 to Addlestone town centre (see reference to Addlestone AQMA), thence to Brooklands and Byfleet Industrial Parks, the A245 and A3. The A318 is also compromise at Byfleet and New Haw station by the single file traffic under the Railway bridge Corrected text in Blue. The correction is relevant because of the Air quality issues and traffic issues previously mentioned. See map below</p> <p><b>1.2 General observation regarding the content</b></p> <p>Large tables, such as Table 1-3: Compliance with the SEA Regulations would be better located in the appendices as this is primarily a reference between the document and SEA Regulations.</p> <p>There appears to be a lot of repetition particularly within tables. In Table 2-1: Relevant Plans and Programmes and Sustainability Objectives/Key Messages the first paragraph of each topic is description of what needs to be retained, if possible and the second paragraph essentially states 'The SA should include objectives to address.....'. why the need for the second paragraph if it always reflects the desire of the first paragraph.</p> <p>Table 3-2: Issues/Problems for Biodiversity&amp; Green/Blue Infrastructure, raised the question regarding the column heading and what they imply. This is all about how the Plan will meet NPPF Requirements/ Targets and implies that issues and problems exist</p>	<p>Noted, however it is considered that signposting how the SA Scoping meets the requirements of SEA Regulations is best placed in the main report to ensure prominence.</p> <p>The first paragraph in each section in Table 2-1, sets out a summary of the key messages/objectives derived from the list of plans, policies and programmes which the Local Plan should seek to achieve. The second paragraph sets out how these key/messages/objectives should be taken into account in SA objectives against which the 2040 Local Plan will be assessed.</p> <p>Table 3-2 (and other tables highlighting issues/problems) do not show how the plan will meet NPPF requirements/ targets. The</p>	<p>No.</p> <p>No.</p> <p>No.</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?																
	<p>within the existing plan and what should be done to meet the NPPF requirement. I believe the emphasis should be changed top positively show how well RBC is doing in achieving the targets and would suggest the following.</p> <table border="1" data-bbox="483 467 1211 624"> <thead> <tr> <th data-bbox="483 467 689 624">NPPF Requirements and Relationship to Other PPPs</th> <th data-bbox="694 467 804 624">Source</th> <th data-bbox="808 467 999 624">Aims / Targets of the requirements</th> <th data-bbox="1003 467 1211 624">How Local Plan meets these goals</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>It is particularly noticeable in Table 2-12: Issues/Problems for Economy &amp; Employment where the following is stated as an issue, when clearly it is not <i>'Runnymede continues to be an area of high economic performance.'</i></p> <p>So, if the NPPF requirement must be addressed in the SEA report it would read far better as:</p> <table border="1" data-bbox="483 962 1211 1147"> <thead> <tr> <th data-bbox="483 962 689 1147">NPPF Requirements and Relationship to Other PPPs</th> <th data-bbox="694 962 837 1147">Source How Local Plan meets these goals</th> <th data-bbox="842 962 1032 1147">Aims / Targets of the requirements</th> <th data-bbox="1037 962 1211 1147">How Local Plan meets these goals</th> </tr> </thead> <tbody> <tr> <td data-bbox="483 1150 689 1394">NPPF-make sufficient provision for: employment, retail, leisure and other commercial development.</td> <td data-bbox="694 1150 837 1394">Baseline Information</td> <td data-bbox="842 1150 1032 1394">The 2040 Local Plan should include/retain policies which maintain Runnymede's</td> <td data-bbox="1037 1150 1211 1394">Runnymede continues to be an area of high economic performance</td> </tr> </tbody> </table>	NPPF Requirements and Relationship to Other PPPs	Source	Aims / Targets of the requirements	How Local Plan meets these goals					NPPF Requirements and Relationship to Other PPPs	Source How Local Plan meets these goals	Aims / Targets of the requirements	How Local Plan meets these goals	NPPF-make sufficient provision for: employment, retail, leisure and other commercial development.	Baseline Information	The 2040 Local Plan should include/retain policies which maintain Runnymede's	Runnymede continues to be an area of high economic performance	<p>issues/problems set out are derived from the baseline environmental data set out earlier in that section and key messages/objectives of all relevant plans, policies and programmes (the most pertinent shown in the final column). The table then explains how the 2040 Local Plan could seek to address the issues highlighted by the environmental baseline and other PPPs.</p> <p>Note, Table title should be 12-12 and this will be amended.</p> <p>See comment above re: what the tables are showing.</p>	<p>Yes. Amend numbering of Table 2-12.</p> <p>No.</p>
NPPF Requirements and Relationship to Other PPPs	Source	Aims / Targets of the requirements	How Local Plan meets these goals																
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	<p>Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt</p>		<p>economic performance but will need to balance against travel demand.</p>		<p>Noted, however margin widths are considered to be appropriate.</p> <p>Whilst this change could be made this is likely to make the document longer.</p> <p>Noted, subheadings could be listed in the contents page, although this would make the contents page longer.</p>	<p>No.</p> <p>No.</p> <p>Yes. Add sub-headings to contents.</p>
<p><b>2 PRESENTATION</b></p>						
<p>2.1 Page layout</p>						
<p>This is a large document and a challenge to read. I believe that if narrower margins were used it would not only reduce the number of pages, it would also make the reading of table much easier.</p>						
<p>For large tables in particular, they would be far easier to read if they were presented in landscape format. The reference to margin width also includes those table already presented in landscape format.</p>						
<p><b>2.2 Contents Numbering</b></p>						
<p>There is only high level numbering of the document on the Contents Page. It would make it easier to follow and read if for instance the heading 1 was shown as follows:</p>						
<p>1. INTRODUCTION</p>						
<p>1.1 Sustainable Development</p>						
<p>1.1.1 There are many definitions of</p>						

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	<p>1.1.2 There is now an international 1.2 Sustainability Appraisal and Strategic Environmental Assessment 1.2.1 Section 19(5) of the Planning &amp; Compulsory 1.3 THE PURPOSE AND METHODOLOGY OF SA/SEA 1.3.1 The SA/SEA Methodology 1.4 Area 1.5. The Runnymede 2040 Local Plan</p> <p>I think also that Table 1-3: Compliance with the SEA Regulations, would be better as an appendix and potentially AREA and The Runnymede 2040 Local Plan, need separating as separate topics as on initial read all appear to be part of Methodology,</p> <p><b>2.3 Comment:</b></p> <p>SA/SEA and the2040 Local Plan (Points 1.33 and 1.34) would be better place in the Foreword</p>	<p>See comments above re: signposting to SEA Regulations.</p> <p>Considered that paragraph 1.33 gives content to the process and is appropriate where it is. Paragraph 1.34 will be deleted as consultation on SA Scoping has been completed.</p>	<p>No.</p> <p>Yes. Delete para 1.34.</p>
Point Consultancy obo Re-creo	<p>Re-creo is promoting land at Addlestone for residential development and is engaging with successive stages of the preparation of the Local Plan as consultation opportunities arise.</p> <p>Addlestone is the main town in Runneymede District, and Re-creo's site is on the immediate periphery of the town. Development at this location would have high accessibility to the town's good range of services and facilities. The site is urban fringe in character, is not of</p>	<p>Noted.</p> <p>Noted.</p>	<p>N/A</p> <p>N/A</p>

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	<p>high landscape quality, and nor does it contain any significant environmental assets. It is well contained by the A320 and its accompanying earthworks which create an effective edge to the settlement.</p> <p>One of the simplest and most powerful ways for spatial planning to promote sustainable development – in accordance with the statutory objective of planmaking from s38 of the 2004 Act – is for development provision to be made close to where the need is arising and in ways which enhance accessibility to facilities and services. The allocation of this site in the forthcoming Local Plan would be entirely consistent with the overriding aim of planning legislation and national planning policy.</p> <p><b>2. The Scoping Report and Sustainability Appraisal</b></p> <p>Our submissions on the Scoping Report are informed from the experience of carrying out a large number of sustainability appraisals and indeed from challenging the use of many others alongside the preparation of local plans.</p> <p>Our experience is that the way a sustainability appraisal has influenced the preparation of local plans is an increasingly important part of their examination. Planning inspectors are regularly questioning whether the sustainability appraisal of a local plan has been 'adequate'. This term whilst regularly used in inspector's questions, gives a misleading impression of where the bar is set. The real tests of a sustainability appraisal are whether:</p>	<p>Noted, however the Council also needs to consider other factors when considering potential allocation sites. In any event this a matter for the Local Plan process and not the role of the SA Scoping Report.</p> <p>Noted.</p> <p>Noted.</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p>

Representor	Summary of Representation	Council's Response	Amend SA Scoping?
	<ul style="list-style-type: none"> <li>• It is undertaken in a genuinely independent and objective manner</li> <li>• It is challenging in terms of always asking whether there a better alternative from the point of view of promoting sustainable development;</li> <li>and</li> <li>• It has demonstrably had a positive influence on the emerging plan through successive iterations of its preparation.</li> </ul> <p>Our submission is written with the expectation that the examination of the Runneymede Local Plan will look for this relationship between the sustainability appraisal and the submitted Local Plan.</p> <p>The Scoping Report has a vital role in setting out the methodology for the sustainability appraisal. The sustainability appraisal in turn has a vital role in ensuring that the submitted local plan does as well as it can in furthering the interests of sustainable development. The promotion of sustainable development is the statutory objective of plan-making, and sits above all else in national planning policy. There is a statutory requirement to undertake and publish a sustainability appraisal of a local plan, and (from the SEA Regulations) for the environmental effects of reasonable alternatives to be reported upon.</p> <p>This may not expressly require the spatial strategy most likely to deliver the best contribution to sustainable development to be chosen, but once real alternatives have been identified and tested it effectively becomes</p>	<p>Noted.</p> <p>Noted. The role of the SA/SEA is to ensure that potential environmental effects of reasonable alternatives to the plan are given full consideration in the plan-making process alongside social and economic issues.</p> <p>Noted, however paragraph 35 of the NPPF sets out that a plan is justified if based on an 'appropriate strategy'. This will be for the 2040 Local Plan to determine based upon an up to date</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p>

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	<p>unacceptable to do otherwise. At very least, very convincing reasons would have to be provided if the most sustainable approach is not chosen.</p> <p>The objectives of the Sustainability Framework in the Scoping Report, posed mainly as questions, are generally applauded as covering the issues that properly characterise more sustainable development, and doing so in a targeted and manageable way with relatively little overlap. If performance against these objectives or criteria is rigorously used in making choices in the emerging Local Plan, in the formulation of the spatial strategy and in selecting sites to implement the spatial strategy, the Local Plan should do well in promoting more sustainable development. If not, then the Plan will be open to considerable criticism, including against the four tests of soundness at paragraph 35 of the NPPF July 2021 (the Framework).</p> <p>Every one of the objectives that are most relevant in a spatial planning context would support precisely the location and form of development that is being promoted through the Local Plan by Re-creo.</p> <p>By reference to the Sustainability Framework at section 15 of the Scoping Report, we are pleased to see that green belt is not identified as a sustainability issue – hence avoiding a mistake local planning authorities all too frequently make. Green belt designation is a consequence of a policy to achieve certain purposes, though these are very vague with little spatial specificity to guide what should and shouldn't be green belt. The</p>	<p>evidence base including the SA Environmental Report.</p> <p>Noted.</p> <p>Noted. The merits or otherwise of any site will be a matter for the Local Plan process and evidence which will include future iterations of SA.</p> <p>Noted.</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p>

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	<p>operation of green belt generally acts to bring about patterns of development that are inconsistent with the locations and forms of development that spatial planning should be promoting to bring about more sustainable development.</p> <p>Whilst green belt is not identified as a sustainability issue in the Scoping Report, and so not relevant to the appraisal process, some confusion is potentially raised by then including discussion of green belt in the further sections of the Scoping Report. This appears in the landscape/townscape section of the Baseline Information (section 11 of the Scoping Report). The most relevant sections from the Scoping Report are presented for the reader's convenience, as follows:</p> <p><i>11.12 The extent of Green Belt designation and its associated functions will continue to be protected, even in the absence of the plan, given the general presumption against development set out in the NPPF and 2030 Local Plan. The general presumption, whilst a policy designation not a landscape or environmental designation, should also give continuing protection to the Borough's landscapes given that all land outside of the Borough's urban areas is Green Belt.</i></p> <p><i>11.13 In this respect the 2040 Local Plan should include/retain policies for the control of development in the Green Belt and design policies should have regard to landscape character. In the event that further Green Belt release occur due to pressures from population growth, the 2040 Local Plan will need to ensure that any such areas are located sustainably, in areas of least</i></p>	<p>Noted, however all land outside of the urban area in Runnymede is Green Belt and although not a landscape designation, it will play some role in protecting the Borough's landscapes given the general presumption against development in such areas.</p>	<p>No.</p>

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	<p><i>environmental quality and plan for the transition between the urban area and adjacent landscape and its setting.</i></p> <p>These paragraphs provide a correct explanation of the relationship between green belt policy and landscape issues. Landscape quality is not a factor in designating green belt and shouldn't be a factor in applying green belt policy, including in changing green belt through a local plan as the Framework provides for (site selection for a local plan can be otherwise informed by consideration of landscape quality). However, landscape character assessment techniques can be useful in understanding the contribution of parts of the green belt to the achievement of the purposes for including land in the green belt.</p> <p>We are pleased to note the last sentence of paragraph 11.13 of the Scoping Report. It is entirely evident that the green belt in Runnymede will have to change – it did so the adopted Local Plan, and as stated by the Council, all of the land outside the current extent of the settlements is designated as green belt. The site promoted by Re-creo at Addlestone conforms precisely to what the Council states that any Local Plan allocation of hitherto designated green belt land must do.</p>	<p>Noted.</p> <p>Noted, however the SA Scoping Report makes no decision on Green Belt release as this will be a matter for the Local Plan. The SA Scoping simply states that if this were to happen, then release should promote sustainable patterns of development, be on land of least environmental quality and have regard to the transition between the urban area and wider landscape.</p>	<p>N/A</p> <p>No.</p>
Surrey County Council	No comments	Noted.	N/A
Transport for London	No comments	Noted.	N/A