

Stephanie Broadley

From: Graham Stephens [REDACTED]
Sent: 11 April 2023 10:40
To: Planning Policy
Cc: [REDACTED]
Subject: [EXTERNAL] RHUL_Englefield Green Neighbourhood Plan (RHUL representation) [STRI.47hn]
Attachments: 221125_RHUL Brownfield Register (Submission).pdf; 155825-STL-XX-00-DR-A-00010-Site Location Plan.pdf; 221106_EGVNP Representation by RHUL (6th Nov).pdf
Importance: High
Categories: Sent to Steph

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Dear Sir/Madam

RHUL_Englefield Green Neighbourhood Plan (RHUL representation)

In relation to the above Regulation 16 Draft Consultation suite of documents, please find below observations prepared and issued on behalf of **Royal Holloway University of London**.

Please note that the comments below draw upon our 6th November 2022 Neighbourhood Plan representation to the Forum and our 26th November 2022 Brownfield Register submission to Runnymede Borough Council. For completeness, and given that the Reg 16 Neighbourhood Plan content has not materially captured the majority of the comments and observations made by the University in its 6th November 2022 submission, this is attached. Also attached is our 26th November 2022 Brownfield Register submission, which includes an accurate site location plan for the Kingswood Hall site. This document is specifically relevant to the capacity of the Kingswood Hall site (as referenced in Policy ND4 of the Neighbourhood Plan). The 26th November 2022 submission aligns with the substantive content of the University's 6th November 2022 submission and reflects site specific capacity assessments undertaken by the University between the 6th November Neighbourhood Plan submission and the 26th November 2022 Brownfield Register submission. The comments below should be read alongside the attached.

We have endeavoured to cross-reference the content of the two earlier submissions with the comments below and the paragraph or section number of the Neighbourhood Plan suite of documents.

General Comments:

The following are general comments which would apply to the wider context of the Neighbourhood Plan and which are considered material to present an accurate, updated and current position influencing development in the Neighbourhood Plan area.

1. The Neighbourhood Plan does not refer to the university's acquisition of the Rusham Park site in 2017, or resultant February 2022 outline planning permission (LPA Reference: RU.20/0098), or September 2022 reserved matters approval (LPA Reference: RU.22/0394) for a student village comprising up to 1,400 student study bedrooms. The delivery of this scheme is material to and positively responds to aspects of student housing demand identified within the Neighbourhood Plan area.
2. Please see our October 2022 representation in relation to the absence of a bespoke Housing Demand Study due to concerns that student responses would distort the study findings.

Detailed Comments:

1. **Policy ND4: Coopers Hill (Cross-reference to Para 5.4 / Para 8.5 / AECOM Masterplan document (pages 52-62)).** This site-specific policy relating to Kingswood Hall states that only development proposals which are in accordance with the Masterplan document prepared by AECOM will be supported. This includes the quantum of development. As per our 6th November 2022 Neighbourhood Plan representation and our 26th November 2022 Brownfield Register (both attached), the University objects to this policy wording. The wording fails to acknowledge the Council and University's capacity assessments (which indicate a capacity of c170 units) and is contradictory to the Neighbourhood Plan Forum's response which states "*We have shown one way in which the site could be developed that we think is appropriate and sensitive, given its green belt status and wooded, rural setting*". Alternative arrangements are possible as part of a redevelopment of the site.

The policy also appears to conflict with Para 5.4 which states that there is "*some increased development (potential) on previously developed land at [Kingswood Hall] owned by RHUL in accordance with their own Estate Plan*". The capacity assessment included within the suite of Neighbourhood Plan documents appears to be based on a pre-determined set of principles prepared by consultants for the Forum and does not reflect the parameters which may be justified under the very special circumstances policy approach within Green Belts. The AECOM Masterplan is therefore conservative in its plans for the redevelopment of the site. The Masterplan is extremely limited in its exploration of the potential capacity of the site through reconfiguration, infilling and/or complete redevelopment as advocated by para 149 of the NPPF/Policy EE17 Local Plan 2030.

In summary, the university considers that the minimum number of residential units capable of being delivered in a residential redevelopment of the Kingswood Hall site is 157 and that the appropriate range (allowing for

alternative configurations) should be between 157 and 172 units (based on a 10% upward variance). The Neighbourhood Plan places the capacity at only 84 units. **For the reasons stated, RHUL does not support this aspect of the Neighbourhood Plan.**

The future of the Kingswood site will be informed by future technical impact assessments and design studies and considered in the context of national and local Green Belt policy. As such, the implication of a highly restricted set of development principles which would suggest a net loss of housing is **not supported**. Policy ND4 as drafted is recommended to be removed from the Neighbourhood Plan: by removing the reference to needing to be in accordance with the Masterplan, the residual text offers nothing which the Development Plan or NPPF guidance already covers.

If a site-specific policy is required, it is suggested that the following is adopted:

"The Neighbourhood Plan recognises that the future of the Kingswood Hall site may change during the Plan period. It is acknowledged that an increased development potential exists on previously developed land at Kingswood Hall. The Forum requests that Royal Holloway University of London engage with the Neighbourhood Plan Forum ahead of the formal submission of alternative use or redevelopment planning applications. The development capacity of the site will be determined by means of bespoke technical impact assessments and design studies. In support of the efficient use of land advocated by the NPPF and in line with Green Belt policy, alternative development proposals will have regard to the openness of the Green Belt unless very special circumstances are demonstrated."

2. **Policy ND1: Development within the Settlement Boundary.** This policy is too rigidly worded and is **not supported**. The Policy as drafted could be applied to refuse any proposal which would result in...."*additional traffic resulting from the development*". This would apply to all development. In accordance with NPPF para 111, "*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*". The Neighbourhood Plan should acknowledge that each major scheme will need a Transport Statement or Assessment to justify the development in terms of transportation implications and their

approach to supporting sustainable transport movements. **For the reasons stated, RHUL does not support this aspect of the Neighbourhood Plan.**

3. **Neighbourhood Plan – Section 12.** No reference is made to the ability for the public to access University assets, such as, but not limited to the Library, Chapel, Shop and catering facilities distributed across the Campus.
4. **Neighbourhood Plan - Para 12.4.** No reference is made to the Sports Facilities owned and operated by Royal Holloway University of London within the list of available facilities in the area. The facilities at Nobles Field off Prune Hill includes multiple all weather sports pitches, grassed pitches, gym and changing facilities for team based sports and is available for booking in the same manner as pitches elsewhere within Englefield Green. This should be captured within the Neighbourhood Plan and would recognise the wider community benefits provided by the University which are available to local community and sporting groups.
5. **Neighbourhood Plan – Para 15.8 (Car Use and Parking).** The Rusham Park permission has generated a financial contribution of £46,703.50 as a fifty percent university contribution towards the creation of controlled parking zones. This is not cited in the Neighbourhood Plan yet is material to the future management of car parking across Englefield Green and Egham. This payment would respond, in part, to issues presented in para 15.8 of the Plan. In addition, the Neighbourhood Plan does not refer to the ability of Royal Holloway University of London to utilise the acquired 408 capacity decked car park within the Rusham Park site (planning permission RU.20.0092 dated 21st January 2023). The use of this car park represents part of a campus wide car parking management plan to be developed and implemented in phases over the life of the Neighbourhood Plan. **For the reasons stated, RHUL does not support this aspect of the Neighbourhood Plan.**
6. **Neighbourhood Plan - Section 16.** The Neighbourhood Plan acknowledges in para 16.2 that the University developed a Masterplan (subsequently referred to as the “Estate Plan” within the University) in 2014 and that underpinned an outline planning application. The Plan does not expressly acknowledge that outline planning permission was granted on the 5th April 2015 and remains extant, with reserved matters capable of being submitted to secure the necessary approvals for compliant proposals to be delivered. The outline permission sets out a range of floor area and other parameters against which reserved matters will be determined.
7. **Design Codes and Neighbourhood Plan - Section 16:** The preparation of Design Codes, and in particular Code C0-06 “Students”, while presenting suggestions as to nature of future development proposals across the University estate, does not replace or supersede the underlying planning permission which exists. The status of the 2015 outline planning permission is material to several parts of the overall Neighbourhood Plan, including reference to student accommodation provision and location of development across the Campus, including land north of the A30. The 2015 permission has also facilitated considerable financial contributions towards off-site highway improvements in the wider area. This is not referenced in the Neighbourhood Plan as being a tangible community benefit resulting from the development of the campus in recent years. **For the reasons stated, RHUL does not support this aspect of the Neighbourhood Plan.**
8. **Non-Designated Heritage Asset Document (and summarised in the Neighbourhood Plan at Appendix D site reference 58).** These references list Sutherland House Lodge which is Grade II listed (and therefore a registered asset). As such, reference to this building should be removed from the Non-Designated List.

Royal Holloway University of London supports as a key aim of the Neighbourhood Plan *“to ensure that the development of the Royal Holloway University of London is in harmony with the development of the surrounding urban and rural areas”*. The University is pleased to see positive comments relating to the creation of *“a special ‘sense of place’ that comes from the past but can be added to in a contemporary way to combine the best of the old”* (Design Code C0-06 “Students”) when describing the Campus. The University is driven by a desire to improve the functionality, flexibility, building performance and attractiveness of the Campus for all and will work with stakeholders to ensure that the estate continues to be managed and transformed in a positive manner having regard to its cultural, community and heritage context and the operational needs of the institution. **For the reasons stated, RHUL supports these aspects of the Neighbourhood Plan.**

Ends

If Council Officers wish to discuss the content of the above in the context of our previous submissions on behalf of Royal Holloway University of London, please do not hesitate to make contact and we will be delighted to arrange a meeting with the University Estates Team.

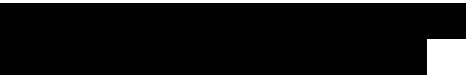
Kindest regards

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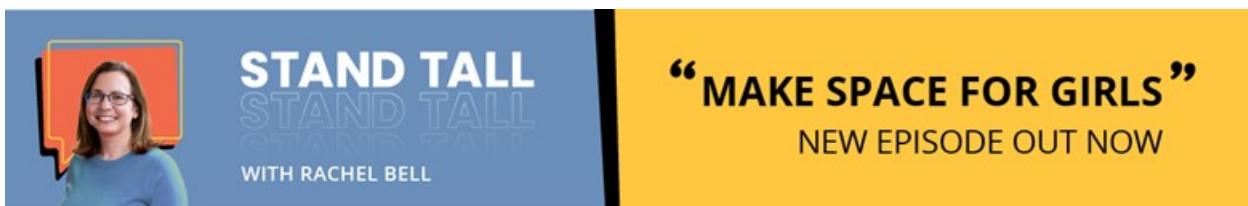
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