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## REG.14: Residents and Local Business Consultation - 12th Sept. to 6th Nov. 2022

Comments Form for the Englefield Green Village Neighbourhood Plan

Email \*

[REDACTED]

Your Name

\*

Graham Stephens (for Stride Treglown, acting for Royal Holloway University of London)

Property Name and/or Number

\*

Kingswood Halls (Royal Holloway)

Street/Road Name

\*

Coopers Hill Lane

Postcode

\*

[REDACTED]

I confirm I have read and accepted the Englefield Green Village Neighbourhood Forum Privacy Policy \*

I have read and accepted the Englefield Green Village Neighbourhood Forum Privacy Policy Comments - (Please specify the EGVNP document and section that your comments refer to)

Royal Holloway, University of London RHUL would like to respond to the Englefield Green Draft Neighbourhood Development Plan (NDP) as follows:

Royal Holloway welcomes the work that has been carried out by the steering group in preparing the Draft Neighbourhood Development Plan for Englefield Green.

Perceived Neighbourhood Development Plan context as presented by the Forum:

The NDP is a conservative document with the focus on “little room for further development” based upon a perceived position that “the urban area is almost fully developed” and surrounded by “important and essential” Green Belt. The NDP does not allocate defined or opportunity sites for housing. It identifies that any new development will be restricted to “redevelopments of sites, infill between or behind existing buildings and some increased development in the already-developed” Royal Holloway operational sites.

Corrections:

There are some factual inaccuracies within the Neighbourhood Development Plan that the university wish to point out:

In section 13.22 of the draft NDP, the list of public houses in the area excludes The Packhorse. Royal Holloway would like it noted that the site boundary identified on the AECOM Masterplan is incorrect and does not accurately represent the parameters of the site.

Section 14.4 states that Community Infrastructure Levy (CIL) charge is non-negotiable and applied to residential and office developments. It would be clear to all if reference was made within the NDP to the fact that there is a £0 CIL charge levied in relation to student accommodation across the Borough.

Response in relation to Parking issues: (general observations relating to multiple references throughout the Draft)

The university rebuts the findings of the evidence gathering in respect of parking in Englefield Green and the responsibility for parking issues in the village falling to the university. Several attempts to introduce parking management schemes in Englefield Green have been met with reluctance from the local community. Recent parking data gathered by Surrey County Council did not identify Royal Holloway as a primary cause of the parking concerns in the village. The s106 agreement drafted in connection with the Student Village at Rusham Park has allocated £46,703.50 as a fifty percent university contribution towards the creation of controlled parking zones. The Neighbourhood Development Group will need to negotiate with Runnymede Borough Council in relation to the distribution of these funds.

Response in relation to NDP evidence base (Para 8.5):

The evidence for housing need in the designated area has not been collated, due to the NDP Forum taking a position that that the results of any local survey covering housing need would be skewed by input from students living in Englefield Green. Students form an integral part of the community of Englefield Green, and their opinion and housing needs should be considered, rather than excluded from evidence gathering for the Neighbourhood Development Plan. The NDP consultation was shaped to engage staff and students from Royal Holloway including, most recently, the deposit of a copy of the draft NDP on campus. The College feel that the subsequent exclusion of students from the opportunity to participate in housing need evidence gathering is not considered sound.

Response in relation to provision of specialist housing (Student Accommodation):

As stated in Runnymede Local Plan 2030, Royal Holloway is committed to minimise the pressure on the existing housing stock in the Borough through the provision of new plan compliant purpose built, as well as improved existing, student accommodation to meet the proposed growth in student numbers. This policy objective should be acknowledged within the Development Plan.

Response in relation to RHUL owned sites in the plan area (including but not limited to para 16.4):

Royal Holloway holds significant land assets within the Neighbourhood Plan Area.

Notwithstanding the preference expressed within the NDP for no further development by the university north of the A30, there may be operational benefits to bringing these sites forward to realise the ambitions and obligations of the university. Any development will, of course, be subject to the normal public engagement processes expected of major development proposals ahead of formal planning application / reserved matters submissions.

Response in relation to Kingswood Hall site specific references (including but not limited to Draft Policy ND4: Coopers Hill Site):

The Kingswood Hall site is owned by Royal Holloway. The site has a total capacity to accommodate c413 students, though only 352 students currently reside on site.

The site has been discussed within the emerging Englefield Green Neighbourhood Development Plan as a site with potential for limited redevelopment as residential accommodation. This redevelopment has been explored within the AECOM Masterplan. The AECOM Masterplan is 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. The Masterplan proposes redevelopment of the site to create 84 new Use Class C3 residential dwellings. However, taking into account the total capacity of the site (413 study bedrooms), this equates to an equivalent of 133 residential units (student bedrooms divided by 3.1 to achieve a Use Class C3 equivalence). The NDP is therefore suggesting a net loss of housing. The university challenges the NDP in this regard and suggests that the future capacity of the site in a residential redevelopment / repurposing scenario should be far higher than currently advocated by the draft Neighbourhood Plan.

The NDP does not allocate the site for housing nor does the plan endorse any Green Belt boundary or other adjustment to accommodate development. A NPD can devise policy that recommends land for housing in the Green Belt, should the Local Planning Authority be so minded in their emerging local plan. Royal Holloway will be retaining the option of redevelopment or repurposing of the Kingswood Hall site. Whilst the need at present is to develop student accommodation to meet the changing needs of the College, this need could be realised through disposal, a third-party provider, or as owner/occupier. The reduction in the number of student study bedrooms at Rusham Park (1,400 beds now consented in Phase 1 compared to the initial planning application submission in January 2020 of 2,000 beds) influences the demand for ongoing student accommodation. Intensification of student accommodation use across the Kingswood site may also offer long term resilience to the university. Royal Holloway may also consider the site for disposal for other (specialist) residential use if this was considered

appropriate in the future. The university is currently engaged in discussions with commercial property consultants to help inform its strategy for the site.

#### Closing remarks

Whilst the University welcomes the progress made in developing the NDP in Englefield Green, and reference within the plan to a site specific Masterplan, Royal Holloway believes that any Masterplan for the Kingswood Hall site would be best prepared by the university, who have close insight into the needs of the student body, the future of the university, understanding of the wider estate strategy, project interdependences and experience in devising and delivery phased Estate plans.