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Report on Englefield Green Village Neighbourhood Development Plan 2022-2030

An Examination undertaken for Runnymede Borough Council with the support of Englefield Green Village Neighbourhood Forum on the January 2023 submission version of the Plan.

Independent Examiner: Derek Stebbing BA(Hons) DipEP MRTPI

Date of Report: 4 September 2023

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Main Findings - Executive Summary

From my examination of the Englefield Green Village Neighbourhood Development Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – the Englefield Green Village Neighbourhood Forum (the Forum/EGVNF);
- the Plan has been prepared for an area properly designated – the Englefield Green Village Neighbourhood Area, as identified on the map at page 8 of the Plan;
- the Plan specifies the period to which it is to take effect – from 2022 to 2030; and,
- the policies relate to the development and use of land for a designated neighbourhood plan area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Englefield Green Village Neighbourhood Development Plan 2022-2030

- 1.1 Englefield Green is a village within Runnymede borough in the north-west of Surrey and is the site of a historic village set around the Green which is believed to have been an Anglo-Saxon forest clearing. The area historically consisted of farmsteads and small cottages. In the eighteenth century, the village's **proximity to Windsor** and to the Royal Court led to members of the gentry constructing houses around the Green, further encouraged by improvements to the local road network. As part of the Enclosure Act 1814, the Green was exempt from enclosure and retained for the pleasure and enjoyment of the surrounding houses. The area of the village centred on the Green was first designated as a Conservation Area in 1970, which was extended to include the wooded area to the north of the Green in 1978.
- 1.2 Following the Enclosure Act, further new development was forced away from the Green. This included large houses and institutions set in **extensive parkland. Other development consisted of labourers' cottages** built around sandpits on Harvest Road. In 1865 a mansion in neo-Gothic style was built for Albert Grant on the site of Ankerwyke

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Purnish to the east of the Green. Following his bankruptcy in ca. 1870, it was extended and became the Royal Indian Engineering College. A number of neo-vernacular style villas were constructed along Coopers Hill Lane for senior staff at the College. The College has more recently been redeveloped into a mix of apartments and affordable housing units.

- 1.3 Immediately south of the Green is the settlement of Englefield Green, which was developed from the mid-nineteenth century onwards around Harvest Road, South Road, Victoria Street, St. Judes Road and Bond Street. **It was described on some maps as 'New Egham' as the town of Egham lies 1.6 km to the east.** To the west of Englefield Green is Windsor Great Park, which was historically the hunting ground for Windsor Castle. There is an entrance to the Park from Englefield Green at Bishopsgate Road. To the east is Runnymede, a water meadow on the banks of the River Thames near Egham, and famous for the sealing of the Magna Carta by King John in 1215. Overlooking Runnymede is the Commonwealth Air Forces Memorial. To the south-east of the village is the campus of Royal Holloway, University of London (RHUL), set within 55 hectares of woodland, with over 12,000 undergraduate and postgraduate students and over 2,000 staff.
- 1.4 Englefield Green had a population of 10,607 at the 2011 Census, but this excludes the student population. It is situated close to the M25 motorway (via junction 13) and the A30 road to the south-west. The nearest railway station is at Egham, with services to London (Waterloo), Chertsey and Reading. The village has a number of schools, with three state-sector primary schools and a number of independent preparatory schools. There is not a secondary school within the village, and students travel to schools elsewhere, mainly to schools in Egham. There is a range of community, sports and leisure facilities within the area, including a cricket pitch and **pavilion on the Green. The village's shopping area is focused on Victoria Street and St. Jude's Road, although a number of former shops at Victoria Street have been closed and converted to other uses, including office and residential use.**
- 1.5 The Borough of Runnymede is unparished, and there are two electoral Wards, Englefield Green East and Englefield Green West, covering the village. The designated Neighbourhood Area is, with minor exceptions, the area covered by these two Wards (see also paragraph 3.2 below).

The Independent Examiner

- 1.6 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Plan by Runnymede Borough Council (the Council/RBC), with the agreement of the Forum.
- 1.7 I am a chartered town planner, with over 45 years of experience in planning. I have worked in both the public and private sectors and have experience of examining both local plans and neighbourhood plans. I have also served on a Government working group considering measures

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to improve the local plan system and undertaken peer reviews on behalf of the Planning Advisory Service. I therefore have the appropriate qualifications and experience to carry out this independent examination.

- 1.8 I am independent of the qualifying body and the local authority and do not have an interest in any of the land that may be affected by the Plan.

The Scope of the Examination

- 1.9 As the independent examiner, I am required to produce this report and recommend either:

(a) that the neighbourhood plan is submitted to a referendum without changes; or

(b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or

(c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

- 1.10 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) (**'the 1990 Act'**). The examiner must consider:

- Whether the plan meets the Basic Conditions.
- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) (**'the 2004 Act'**). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - **it does not include provisions and policies for 'excluded development';** and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) (**'the 2012 Regulations'**).

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1.11 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.12 **The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act.** In order to meet the Basic Conditions, the neighbourhood plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with and not breach European Union (EU) obligations (under retained EU law)¹; and
- meet prescribed conditions and comply with prescribed matters.

1.13 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of **Habitats and Species Regulations 2017 ('the Habitats Regulations')**.²

2. Approach to the Examination

Planning Policy Context

2.1 The Development Plan for this part of Runnymede Borough Council, not including documents relating to excluded minerals and waste development, consists of the Runnymede 2030 Local Plan (RLP), adopted July 2020, which covers the period from 2015 to 2030. RBC has commenced a review of the adopted Local Plan. It is anticipated that the review will extend the Plan period to at least 2040. **The Council's** most recent Local Development Scheme (LDS) (September 2020) indicated that a Regulation 18 Issues and Options consultation would take place in August/September 2022 followed by a further Regulation 18 consultation on the draft Review Plan in May/June 2023. Regulation 19 pre-submission consultation was programmed for January/February 2024, with formal

¹ The existing body of environmental regulation is retained in UK law.

² This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

adoption being anticipated in July 2025. The third of my questions (see paragraph 2.8 below) relates to the progress of the Local Plan Review.

- 2.2 The adopted Local Plan contains a suite of 70 policies, of which Policies SD1-SD9 relate to the Plan's strategy for sustainable development. Policy SL5 is a housing allocation policy for the development of a minimum of 100 dwellings on land at Blays House, Blays Lane, Englefield Green during 2022-2027, as one of the Local Plan's strategic housing sites for the period up to 2030. The policy sets out the following requirements:

"This 2.86ha site is located on the southern side of Englefield Green and will deliver a high quality development that will:

- a) Make provision for a minimum of 100 net additional C3 dwellings;*
- b) Take account of site boundary vegetation in the design, layout and landscaping of the site especially fronting Wick Road and the north boundary of the site. This will need to be demonstrated and implemented through an appropriate landscaping strategy;*
- c) Safeguard biodiversity at the Windsor Great Park SNCI in the design and layout of the site through an appropriately designed green infrastructure buffer and through provision of boundary vegetation and landscaping take account of the objectives and targets for Biodiversity Opportunity Area TV01. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans;*
- d) Ensure that the Locally Listed Park House and its setting is maintained and enhanced;*
- e) Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site specific Travel Plan and Transport Assessment and improve the pedestrian footway between the site and London Road;*
- f) Make a financial contribution(s) towards the provision of early years, primary and secondary school infrastructure either through S106 or CIL (or its successor);*
- g) Avoid impact to the Thames Basin Heaths SPA through an approved scheme of mitigation which makes provision for the delivery of SANG and a financial contribution(s) towards SAMM;*
- h) For the avoidance of doubt, in relation to open space requirements for the site (Policy SL26) it will be expected that open space provision for children and teenagers will be provided on site wherever possible, whilst a financial contribution towards*

off site outdoor sports facilities and allotments will be required. Beyond this it is expected that the applicant will provide or contribute to any other infrastructure identified at application stage which is necessary to make the site acceptable in planning terms. It should be noted that an ordinary watercourse runs along/through the site which could present a flooding risk. This should be addressed in the Flood Risk Assessment which would be expected to be submitted with any planning application at the site. The potential for an ecological buffer to be provided around the watercourse will also be expected to be explored and implemented where it is feasible to do so.”

The Plan takes account of this strategic site allocation in Section 8 (Housing) (see paragraph 4.22 below).

- 2.3 RLP Policy SL27 (Local Green Space) designates seven Local Green Spaces across the borough, of which one is within the Plan area, as follows:
- Arboretum at Royal Holloway University of London.
- 2.4 The Basic Conditions Statement (at pages 4-7 and 9-12) provides an assessment of how the policies proposed in the Plan have regard to national policy and are in general conformity with the relevant strategic policies in the adopted RLP. Having been adopted in 2020, the RLP provides an up-to-date strategic planning context for the Neighbourhood Plan, and this has enabled the Neighbourhood Plan and its policies to be prepared.
- 2.5 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 20 July 2021. All references in this report are to the 2021 NPPF and its accompanying PPG.

Submitted Documents

- 2.6 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Englefield Green Village Neighbourhood Development Plan 2022-2030 submission version (January 2023) and its Appendices;
 - the Strategic Environmental Assessment and Habitats Regulations Assessment Screening Statements and Determinations (February 2023);
 - the Basic Conditions Statement (February 2023);
 - the Consultation Statement (January 2023);
 - all the representations that have been made in accordance with the Regulation 16 consultation;³ and

³ View at: [Neighbourhood planning – Runnymede Borough Council](#)
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- the request for additional clarification sought in my letter of 12 May 2023 to RBC and the Forum and their responses dated 24 May 2023 (RBC), 28 May 2023 (Forum) and 30 June 2023 (Forum).⁴

I have also taken into account an e-mail from RBC dated 11 July 2023 **regarding the matters raised in the Forum’s response dated 30 June 2023** together with a further letter from RBC dated 27 July 2023 (see also paragraphs 2.9 and 2.10 below).

Supporting Documents

2.7 I have also considered the various supporting documents to the submission Plan, including:

- Design Codes (January 2023) (AECOM);
- Masterplan Document (December 2022) (AECOM);
- Biodiversity and Green Spaces in Englefield Green (February 2022) (Surrey Wildlife Trust Ecology Services);
- Englefield Green Placemaking & Movement (September 2022) (i-Transport);
- Placemaking – A Preliminary Study (December 2022) (Englefield Green Neighbourhood Forum);
- A Survey of Non-Designated Heritage Assets in Englefield Green Forum Area (December 2021, and updated December 2022) (Englefield Green Neighbourhood Forum);
- Views Report (August 2022) (Englefield Green Neighbourhood Forum);
- Demographics Section (September 2020) (Englefield Green Neighbourhood Forum);
- History Section (December 2022) (Englefield Green Neighbourhood Forum);
- Responses of Englefield Green residents to the Local Walking and Cycling Infrastructure Plan (LCWIP) for Runnymede (November 2021) (Englefield Green Neighbourhood Forum); and
- Housing Audit (March 2022) (Englefield Green Neighbourhood Forum).

I have also taken into consideration the draft Consultation Version of the Englefield Green Conservation Area Appraisal and Management Plan. This was supplied to me by the Council on 13 June 2023, following its reference in the Regulation 16 consultation response made by the Council and the updated Schedule of Non-Designated Heritage Assets and Locally **Listed Assets (dated 21 June 2023) supplied as part of the Forum’s** response to my Questions (see also paragraph 2.9 below).

⁴ View at: [Neighbourhood planning – Runnymede Borough Council](#)
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Examiner Questions

2.8 Following my appointment as the independent examiner and my initial review of the draft Plan, its supporting documents and representations made at the Regulation 16 stage, I wrote to the Council and the Forum on 12 May 2023 seeking further clarification and information on four matters contained in the submission Plan, as follows:

1. As part of my initial assessment of the Plan, I noted the representations that had been submitted concerning potential changes to land presently comprising part of the Englefield Green Cemetery, including a War Memorial. These changes are identified in detail on Drawing No. ITL17528-GA-002 of the supporting technical document **"Englefield Green Placemaking & Movement", prepared by i-Transport LLP in September 2022**. My assessment of the draft Plan was that **this matter is one part of the bigger project described as "In order to create an identifiable centre to the village of Englefield Green" as listed at Section 17, Page 56 in the draft Plan**. The project is therefore aspirational at this stage. However, in order that I can address the various matters raised in the representations that had been made, I invited the Qualifying Body and the Council to provide me with a fuller statement on the status of the project. In particular, I wished to know whether the project forms part of any capital project programme of the Borough Council or Surrey County Council (as Highways authority), whether any further design work is being undertaken separate to or following the i-Transport study, whether there is any budgetary provision made for the project (including its design) and what is the projected timetable for the delivery of the project? I noted that the project will require the acquisition of some land in third party ownership, including land within the Cemetery.
2. With regard to Non-Designated Heritage Assets (Policy HE2 and Annex D in the draft Plan), **I noted the Council's representations concerning the extent and nature of the justification for the potential designation of a total of 290 buildings and structures as Non-Designated Heritage Assets (NDHAs) within the Plan area (and listed within 161 entries at Annex D)**. In my experience, this is above the normal level of NDHAs expected in a Plan area of this size. I had studied the supporting **technical document "A Survey of Non-Designated Heritage Assets in Englefield Green Forum Area" (dated December 2021 and updated December 2022)** and, from my initial assessment of that document **and the list at Annex D, I shared the Council's concerns that a significant number of the buildings proposed for designation as a NDHA would appear to lack the special architectural, historic or local significance that merits and justifies such designation**. Although not exclusively, this would seem to be the case with a significant number of the residential properties included at Annex D. The Council had identified a number of such properties in their representations. To assist me, I invited the Qualifying Body to review the content of the above-mentioned technical document and to prepare a note identifying

the eligibility of each of the buildings and structures in terms of their importance according to the following criteria: Asset Type; Age; Rarity; Architectural and Artistic Interest; Group Value; Archaeological Value; Historic Interest; and Landmark Status. (I further noted that it would not be necessary to repeat the justification contained in the technical document, but I would expect the note to take account of the **comments contained in the Council's representations to Policy HE2 and its supporting text on this matter**).

3. With regard to the Review of the Runnymede 2030 Local Plan, I sought confirmation from the Council that the Review is progressing in accordance with the timetable contained in the Local Development Scheme (LDS), as approved on 2 September 2020.
 4. With regard to draft Policy CF2, I noted from the draft policy and from Policies Inset Map 1 (at Annex B, page 61, in the draft Plan) that three school playing fields are identified as proposed Local Green Spaces. I therefore requested that the Qualifying Body advise me whether there is any additional use of these playing fields by the local community for non-school purposes. I also requested larger-scale plans showing the proposed boundaries for each of the proposed Local Green Spaces, which in the case of the three school playing fields should clearly define that the Local Green Space designation would only cover the playing fields and no other part of the school premises or its curtilage.
- 2.9 In response to my letter of 12 May 2023, the Borough Council provided me with a response to the questions listed above on 24 May 2023⁵ and the Forum provided its responses on 28 May 2023⁶ and 30 June 2023⁷. I have taken full account of the additional information contained in these responses as part of my assessment of the draft Plan, alongside the documents listed at paragraphs 2.6 and 2.7 above.
- 2.10 On 11 July 2023, the Borough Council requested (by e-mail) that it be able to respond to matters that were **raised in the Forum's response of 30 June 2023. I agreed to this request and asked that the Council's response be submitted by 4 August 2023.** The Council provided a further response on 27 July 2023.
- 2.11 To avoid unnecessary repetition in subsequent sections of this report, I refer to the questions and to the responses from the Council and Forum by their relevant number, e.g. Question No. 1. Readers should refer to paragraph 2.8 above, and to the response documents from each Council for the full text of questions and responses.

⁵ View at: [Neighbourhood planning – Runnymede Borough Council](#)

⁶ View at: [Neighbourhood planning – Runnymede Borough Council](#)

⁷ View at: [Neighbourhood planning – Runnymede Borough Council](#)

Site Visit

- 2.12 I made an unaccompanied site visit to the Neighbourhood Plan Area on 3 June 2023 to familiarise myself with it and visit relevant sites and areas referenced in the Plan, evidential documents and representations.

Written Representations with or without Public Hearing

- 2.13 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections and comments regarding the Plan and presented **arguments for and against the Plan's suitability to proceed to a referendum**. I am satisfied that the material supplied is sufficiently comprehensive for me to be able to deal with the matters raised under the written representations procedure, and that there was not a requirement to convene a public hearing as part of this examination. In all cases, the information provided has enabled me to reach a conclusion on the matters concerned.

Modifications

- 2.14 Where necessary, I have recommended modifications to the Plan (PMs) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications in full in the Appendix to this report.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Plan has been prepared and submitted for examination by the EGVNF. An application to the Council for the designation of the proposed Neighbourhood Area and for the designation of the Forum as the Qualifying Body for the preparation of a neighbourhood plan was made in 2019. The Borough Council's **Planning Committee** formally designated both the Neighbourhood Area and the Forum on 13 November 2019, following public consultation for six weeks between 10 September and 22 October 2019.⁸
- 3.2 The Neighbourhood Area was initially proposed to be the area within the boundaries of **the Council's two electoral Wards of 'Englefield Green East' and 'Englefield Green West'**. However, following preliminary community consultation, the boundary of the proposed Neighbourhood Area was revised, by rationalising the area and excluding some areas that were not considered to be relevant for the purposes of the Neighbourhood Plan (for example parts of the protected Windsor Great Park) and

⁸ View at: [Meeting of Planning Committee on Wednesday, 13th November, 2019 – Runnymede Borough Council](#)

including certain other areas, such as properties that are on the edge of Ward boundary limits but whose occupants identify themselves as being residents of Englefield Green both geographically and communally.

- 3.3 The designated Neighbourhood Area is shown on the map (Map 1) at page 8 in the submission Plan and at Figure 1 in the Basic Conditions Statement. I am satisfied that the Englefield Green Village Neighbourhood Plan is the only Neighbourhood Plan in the designated area.
- 3.4 The EGVNF is the Qualifying Body for the preparation of the Plan. The preparation of the Plan has been led by the Englefield Green Neighbourhood Forum Steering Committee, which was established in December 2019, comprising a number of local residents and other interested members of the community. In accordance with the Constitution of the Forum, membership of the Steering Committee was open to people living, working or studying within the Plan area, with its membership being approved at each Annual General Meeting of the Forum.

Plan Period

- 3.5 The draft Plan specifies (on the front cover and in Section 1) the period to which it is to take effect, which is from 2022 to 2030. The Plan period encompasses the remaining part of the plan period for the adopted RLP (up to 2030). I make a recommendation and proposed modification PM21 (see paragraph 4.88 below) with regard to the future review of the Plan to take account of the emerging review of the adopted RLP. I take into **consideration the Council's response to Question No. 3, which confirmed** that the emerging Local Plan Review had been paused (in September 2022) and also the recent decisions of **the Council's Planning Committee** held on 28 June 2023⁹ that *"work on the next iteration of the Local Plan should be based around the option for preparing a Plan under the new plan-making arrangements that are due to be published by the Government. Once the Government had published its next iteration of the National Planning Policy Framework, a new Local Development Scheme be produced based around the option of preparing a Plan under the new plan-making arrangements, and brought back to Planning Committee, prior to being taken to Full Council for final approval. The Planning Committee would receive a further update on this, ideally at the October 2023 meeting of the Committee"*.

Neighbourhood Plan Preparation and Consultation

- 3.6 The Consultation Statement and its Appendices sets out a comprehensive **record of the Plan's preparation and its associated engagement and** consultation activity between November 2019 and Autumn 2022. The decision to undertake the preparation of the Neighbourhood Plan was

⁹ View at [Minutes Template \(runnymede.gov.uk\)](https://www.runnymede.gov.uk)

taken in 2019, with the Neighbourhood Plan Steering Committee being constituted in December 2019 following the designation of the Neighbourhood Area and the Forum by the Council in November 2019. During early-2020 preliminary engagement work focused on a questionnaire survey of residents and businesses, the development of a dedicated web-site (www.egvplan.org.uk) and the use of social media for developing community awareness. A major public questionnaire together with a business survey were launched in July 2020, supported by e-mail and media campaigns. Public events were difficult to hold during this period due to the Covid-19 restrictions, and the first Public Open Session was not held until September 2021.

- 3.7 The preparation of the Plan and the associated community engagement and consultation has involved four main stages, as follows:
- Stage 1: Initial work, community engagement and survey work (Early-2020 to Spring 2021).
 - Stage 2: Continuing survey work and two Public Open Sessions held in September 2021, accompanied by a flyer distributed to every household in the Neighbourhood Area (Spring 2021 to Autumn 2021).
 - Stage 3: Preparation of draft Plan, Design Codes, other supporting studies and pre-submission consultation on the draft Neighbourhood Plan (Regulation 14) (Autumn 2021 to Autumn 2022).
 - Stage 4: Submission to the Council (Regulation 15), Regulation 16 consultation and submission for examination under Regulation 17 (January to April 2023).
- 3.8 Stage 1 was focused upon the preliminary community engagement and survey work described above and the identification of the themes and topics that would be covered by the Plan.
- 3.9 Work was concentrated during Stage 2 on securing the views of residents **and businesses, through the residents' questionnaire and business survey**, and from the two Public Open Sessions held in September 2021.
- 3.10 During Stage 3, work was focused on the preparation of the draft Plan, supporting studies and accompanying consultation material for the pre-submission Regulation 14 consultation process.
- 3.11 The Regulation 14 draft Plan public consultation was undertaken between 12 September and 23 October 2022. A total of 78 responses were received to the Regulation 14 consultation and Appendix 4 to the Consultation Statement contains a summary of the responses received and the actions taken in relation to the comments received. The consultation was accompanied by extensive local publicity and advertising across the Plan area, with a leaflet being distributed to homes and businesses in the area and with in-person consultation events being held on 1 and 2 October 2022. Certain statutory and non-statutory consultees were contacted separately, including the Council, Surrey County Council, Surrey Wildlife Trust, Historic England and the National Trust. Appendix 4 contains the full consultation responses submitted by those bodies. A

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series of amendments were made to the draft Plan to take account of consultation responses.

- 3.12 Stage 4 comprised the finalisation of the draft submission Plan and its supporting documents by the Steering Committee and the subsequent approval by the Forum of the draft Plan, as amended, for submission to the Council for examination.
- 3.13 The Consultation Statement provides a full record of the consultation and engagement work that was undertaken during the preparation of the Plan, particularly regarding the Regulation 14 pre-submission consultation held in Autumn 2022.
- 3.14 The Forum duly resolved at its meeting held on 17 January 2023 to submit the Plan to the Council for examination under Regulation 15, and the Plan was then formally submitted on 22 February 2023. Regulation 16 consultation was then held for a period of six weeks from 28 February to 11 April 2023. A total of 26 duly made responses from 15 respondents were received during the consultation period, including one late representation submitted on 12 April 2023, which I have accepted. From my assessment of the Consultation Statement, I am satisfied that a transparent, fair and inclusive consultation process has been followed for the Plan, that has had regard to advice in the PPG on plan preparation and engagement and is procedurally compliant in accordance with the legal requirements.

Development and Use of Land

- 3.15 I am satisfied that the draft Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.16 From my review of the documents before me, the draft Plan does not include policies or proposals that relate to any of the categories of excluded development.¹⁰ Surrey County Council is the Minerals and Waste Planning Authority for the Plan area, and the relevant development plan documents for these matters are the adopted Surrey Minerals Plan Core Strategy Development Plan Document (DPD) (adopted July 2011) and the Surrey Waste Local Plan 2019-2033 (adopted December 2020).

Human Rights

- 3.17 Neither the Council nor any other party has raised any issues concerning a breach of, or incompatibility with Convention Rights (within the meaning of the Human Rights Act 1998). From my assessment of the Plan, its accompanying supporting documents and the consultation responses made to the Plan at the Regulations 14 and 16 stages, I am satisfied that

¹⁰ The meaning of 'excluded development' is set out in s.61K of the 1990 Act.
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the Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. I consider that none of the objectives and policies in the Plan will have a negative impact on groups with protected characteristics. Many will have a positive impact.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The Council issued a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Statement in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations') and the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) in February 2023. This was prepared on the basis of the pre-submission policies contained in the draft Plan (dated June 2022), which was the subject of Regulation 14 consultation in September-October 2022. This Screening Statement was submitted alongside the draft Plan and concludes (at Section 6) that the policies in the pre-submission draft Plan are not likely to have significant environmental effects on the environment, and therefore a full SEA is not considered to be required. The Screening Statement was the subject of formal consultation with the Environment Agency, Natural England and Historic England during June/July 2022.
- 4.2 I have considered the SEA methodology set out in the Screening Statement (at Section 3) and process by which the Plan was duly screened (at Section 5) to determine whether the Plan is likely to have significant environmental effects. Overall, I am satisfied that a proportionate approach has been taken and that the Plan was screened to take full account of any potential effects upon interests of environmental, landscape, historic and heritage importance.
- 4.3 The Plan was also screened by the Council in order to establish whether the Plan required HRA under the Habitats Regulations. There are four sites of European importance within 15 kilometres of the Plan area boundary, those being the Windsor Forest and Great Park Special Area of Conservation (SAC), the Thurley, Ash, Pirbright and Chobham SAC, the Thames Basin Heaths Special Protection Area (SPA) and the South West London Waterbodies SPA, including the Thorpe Park Gravel Pit No. 1 Ramsar site. A part of the Windsor Forest and Great Park SAC falls within the Plan area. The HRA Screening Assessment, which is contained within the Screening Statement (at Section 7), concludes (at Section 8) that the draft Plan does not include any proposals that would be likely to adversely affect the integrity of the European sites or in combination with other projects and plans, and that a full HRA Appropriate Assessment of the Plan is not required. I have noted that Natural England's consultation response (at Appendix 2) confirms that position.

- 4.4 Therefore, I consider that on the basis of the information provided and my independent consideration of the SEA and HRA Screening Statement and the Plan itself, I am satisfied that the Plan is compatible with EU obligations under retained EU law.

Main Assessment

- 4.5 **The NPPF states (at paragraph 29) that** *“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the **statutory development plan**”* and also that **“Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”**. The NPPF (at paragraph 11) also sets out the presumption in favour of sustainable development. It goes on to state (at paragraph 13) that neighbourhood plans should support the delivery of strategic policies contained in local plans; and should shape and direct development that is outside of these strategic policies.
- 4.6 Having considered above whether the Plan complies with various legal and procedural requirements, it is now necessary to deal with the question of whether it complies with the remaining Basic Conditions (see paragraph 1.12 of this report), particularly the regard it pays to national policy and guidance, the contribution it makes to sustainable development and whether it is in general conformity with strategic development plan policies.

Specific Issues of Compliance

- 4.7 I test the Plan against the Basic Conditions by considering specific issues **of compliance of the Plan’s** 23 policies, which address the following themes: New Development; Character of the Rural Setting; Historic Environment; Natural Environment; Community Facilities; Employment and Services; Infrastructure Provision; Traffic and Transport; and Royal Holloway University of London. As part of that assessment, I consider whether the policies in the Plan are sufficiently clear and unambiguous, having regard to advice in the PPG. A policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.¹¹ I recommend some modifications as a result.

Overview

- 4.8 The Plan is addressing the period from 2022 to 2030 and seeks to provide a clear planning framework to help shape the development of the area in a sustainable way, to encourage better design, to enhance the

¹¹ PPG Reference ID: 41-041-20140306.

environment and to create a more attractive and a better place to live, work and visit.

- 4.9 Section 1 of the Plan provides an introduction to the Plan describing the role of the Plan, the process for preparing a neighbourhood plan and the status of the relevant EU Obligations as they apply to neighbourhood plans in England.
- 4.10 Section 2 of the Plan describes the strategic policy context provided by the NPPF, describing how neighbourhood planning forms part of the NPPF approach to planning. It sets out the national policy requirement to contribute to the achievement of sustainable development, together with a broad overview of the current Development Plans covering the Plan area, including reference to a Minerals Safeguarding Area to the west of the village designated within the adopted Surrey Minerals Plan Core Strategy DPD. This section includes the map of the designated Neighbourhood Area.
- 4.11 Section 3 of the Plan contains a full description of the Neighbourhood Area, its history and heritage, the green and blue infrastructure within the Plan area, together with the principal recreational facilities and the main educational facilities, notably the RHUL which has a main campus occupying 44.5 hectares of land to the south of Egham Hill (A30 road) and a strip of land on the north-west (village) side of the A30 road. This section also contains key demographic data, together with a listing of the main community facilities and places of worship within the Plan area.
- 4.12 Section 4 of the Plan sets out in detail the community engagement work and consultative stages that took place during the preparation of the draft Plan prior to its formal submission to the Council in February 2023. I summarise this work at paragraphs 3.6-3.13 above.

Challenges

- 4.13 Section 5 of the Plan **is entitled 'Challenges' and notes that Englefield Green Village and its surrounding area is subject to a number of competing and often conflicting development drivers.** It sets out the opportunities and constraints that the Steering Committee identified as being factors that will affect the achievement of the aims of the Plan. This section then goes on to set out details of the supporting studies and background documents that were prepared, with financial assistance from Locality, by consultancies including AECOM, i-Transport and the Surrey Wildlife Trust to provide evidence and detailed planning guidance to support the preparation of the Plan and its policies. Such studies and documents are listed at paragraph 2.7 above, and I have taken account of all relevant material contained within those studies and documents as part of my own assessment of the draft Plan.

Vision and Aims

- 4.14 Section 6 **sets out the Plan's Vision and Aims, and the relationship between the Aims and the Plan's Policies and the relevant supporting documents** is set out more fully at Annex A to the Plan. **The Plan's Vision** is that:

"By 2030, the policies and aspirations in the Englefield Green Village Neighbourhood Plan will have:

- *Helped shape the development of the Area in a sustainable way and create a more attractive and a better place to live work and visit.*
- *Helped to develop a sense of community and identity in Englefield Green Village.*
- *Helped to protect the historic aspects of the Area while developing a modern character fit for the future and to the benefit of residents and visitors.*
- *Helped to preserve the rural aspects of the areas surrounding the **urban centres.**"*

This Vision is supported by 12 Aims, which are reflected in the following sections of the draft Plan by Policies and also Aspirations, for example as listed in Section 17.

Sustainable Development

- 4.15 Section 7 of the Plan is **entitled "Sustainable Development"** and describes the national policy requirement that the Plan must support and contribute to achieving **sustainable development**. **Paragraph 7.6 sets out the Plan's 'Sustainable Development Principles'**, which are as follows:

"Sustainable development for Englefield Green means that development should be:

- ***At an appropriate scale and in locations where it would support the community,***
- ***Of a high standard of design, reflecting the character of the surroundings,***
- ***Improve the biodiversity of the area to be developed,***
- ***Contributing towards infrastructure, jobs and services,***
- ***Meeting contemporary construction, energy efficiency and waste and water management standards,***
- ***Located and designed to enable safe walking and cycling to local services and facilities.***

The following adverse impacts must be avoided:

- ***The loss of the green spaces,***
- ***The loss or inappropriate diversion of public rights of way,***
- ***The loss of or damage to wildlife habitats and hedgerows and trees,***
- ***A loss of amenity for existing residential properties,***
- ***Damage caused by new development to local businesses***

- through loss of trade and/or increased overheads,*
- ***Overloading existing utilities and services (water, drainage, sewage and waste).***

4.16 I consider that overall, subject to the modifications that I recommend to specific **policies below, that individually and collectively the Plan's policies** will contribute to the achievement of sustainable patterns of development in the Plan area.

New Development

- 4.17 Section 8 of the Plan addresses the theme of New Development in the Plan area, noting that the adopted Local Plan sets a requirement for 611 net additional dwellings in Englefield Green by 2030, of which a total of 367 dwellings had been built by March 2021. A site at Blays House, Blays Lane is allocated in the Local Plan for a minimum of 100 dwellings (see Policy ND3 below), whilst a further site at Coopers Hill, and known as Kingswood, is identified in the Plan as a potential residential development opportunity site with a capacity of around 85 dwellings (see Policy ND4 below). The Coopers Hill site is not formally allocated in the Plan for development. However, the supporting Masterplan Document, prepared on behalf of the Forum by AECOM in December 2022, provides masterplanning principles and design guidance for both of these sites, and this has informed the preparation of Policies and their supporting justification in the draft Plan.
- 4.18 This section of the Plan contains six policies (Policies ND1-ND6). I have considered these policies in the context of national policy, the strategic policies of the adopted Local Plan and the representations received at the Regulation 16 consultation stage. I make detailed comments on each policy as below.
- 4.19 Policy ND1 (Development within the Settlement Boundary) states that new development, including housing, small-scale commercial development and community facilities, will be supported on infill or redevelopment sites inside the settlement boundary, which is shown on the Policies Map but without a specific notation, where there is no significant adverse impact on existing residential, employment and community uses. It goes on to state that proposals should not result in significant adverse impacts on the amenity of the occupiers of neighbouring properties, including from additional traffic resulting from the development.
- 4.20 As drafted, neither the policy nor its supporting justification directly seek to promote sustainable development, which is an important consideration within the Plan area with the main settlement being largely bounded by areas of designated Green Belt land where development will only be permitted in very special circumstances. I therefore consider that the policy does require amendment in order to address the requirement to contribute towards achieving sustainable development, as described in Section 7 of the draft Plan. This is addressed by recommended

modification PM1, which also includes an amendment to the Policies Map and its Inset Map and recommended amendments to the first and second parts of the policy.

- 4.21 Policy ND2 (First Homes) states that affordable housing will be supported in new development as required by Local Plan Policy SL20 and that, within that provision, a minimum of 25% of homes shall be provided as First Homes. This draft policy is consistent with national policy and with the **Council's Interim Policy Statement on First Homes (January 2022)**.
- 4.22 Policy ND3 (Blays Lane/Wick Road Allocated Site) states that proposals for the development of this site, which is allocated for development by Policy SL5 in the adopted RLP, will be supported where they are in accordance with the design vision, concept and principles set out in the supporting Masterplan Document, prepared by AECOM in December 2022, and have regard to the Design Codes document, prepared also by AECOM in January 2023.
- 4.23 The Council has made a number of representations concerning this policy and also concerning the Masterplan document. I have taken account of these representations as part of my own assessment and, whilst I do not recommend any amendments to the Masterplan document (as it is a technical document prepared to support the Plan), I do recognise that the policy should contain more flexibility to take account of the detailed technical studies that are required concerning this site following the adoption of the Local Plan. Accordingly, I therefore recommend an amendment to the policy text, which is addressed by proposed modification PM2.
- 4.24 Policy ND4 (Coopers Hill Site) states that proposals for the development/redevelopment of this site will be required to comply with Green Belt policies of the NPPF and the adopted RLP. It goes on to state that proposals for the redevelopment of the site will be supported where they are in accordance with the quantum of development, design concept and principles set out in the supporting Masterplan Document, prepared by AECOM in December 2022, and have regard to the Design Codes document, prepared also by AECOM in January 2023.
- 4.25 This site, which is ca. 6.85 hectares in size, is owned by RHUL and is more correctly known as Kingswood Hall, with an access from Cooper's Hill Lane. The site is entirely within the designated Green Belt and is presently used for student accommodation within a series of buildings in the western part of the site, with a capacity of 413 student study bedrooms. Two of the buildings at the site are identified as Non-Designated Heritage **assets on the Council's Local List**. **RHUL submitted the site for inclusion in the Council's Brownfield Land Register in November 2022 stating that ca. 1.72 hectares of the site is considered to be previously developed land.**
- 4.26 **The site is also included within the Council's latest Strategic Housing Land Availability Assessment (SHLAA) 2021, published in 2022, with the site-**

specific assessment concluding that the site has a potential residential capacity of 161 units (gross).

- 4.27 RHUL and the Council have submitted representations concerning this policy and the Masterplan Document as it relates to this site. In particular, RHUL and the Council both object to the references within the draft Plan (at paragraph 8.26) and in the Masterplan document to the potential residential capacity for the site being ca. 84 units. I visited the site during the course of my site visit in order to gain a fuller understanding of its location and surroundings and the nature of the existing development at the site.
- 4.28 Notwithstanding the significant difference in the projected residential development capacity of the site between the SHLAA and the draft Plan, I take the view that the policy as drafted does not provide sufficient guidance for any potential development proposals at the site, which is in an extremely sensitive location within the Green Belt, east of the Grade II* Listed Commonwealth Air Forces Memorial, south of an area of Ancient Woodland, close to the Runnymede site owned by the National Trust and with open countryside lying to the south and east. In many respects, I consider that the draft Plan is seeking to put forward a development concept for the site, which has been guided by the Masterplan Document, but which has not been the subject of the highest level of scrutiny that will **be required because of the site's sensitive location**, as summarised above, and the national requirement that any development will need to demonstrate the very special circumstances that are necessary for development in the designated Green Belt to be approved. I consider that the differing residential capacities (i.e. 84 or 161 units) for the site can only be viewed as broad estimates at this stage based on two quite **different approaches, namely between AECOM's Masterplan work and the SHLAA assessment**, neither of which has yet been underpinned by the technical studies and impact assessments that will be required in this case. In my assessment, I consider it as being very premature for the Plan to be seeking to establish a level of development at the site, when the site is not presently allocated for development in the adopted RLP, is at one of the most sensitive locations not only within the Borough but also within the wider area and will be the subject of the most rigorous scrutiny should any development/redevelopment proposals be prepared and submitted. If the site does come forward for development/redevelopment during the Plan period and/or is allocated for development in the emerging new Local Plan, then it can be more fully addressed as part of a review of this Plan.
- 4.29 I therefore recommend modifications to the policy text and to its supporting justification, in order to reflect the above points and to satisfy the Basic Conditions. These amendments are addressed by modification PM3.
- 4.30 Policy ND5 (High Quality Design) states that proposals for good quality new development (including new buildings and extensions to existing

buildings) will be supported, where they are in accordance with the guidelines and design codes set out in the Englefield Green Design Codes. It goes on to state that all new development must be designed to enhance the Character Area in which it is situated, and it lists six design criteria that should be addressed as part of development proposals. The policy reflects the content of the supporting Design Codes document, prepared by AECOM in January 2023, which identifies eight Character Areas across the Plan Area and 49 Design Codes under the themes of Mobility (3), Character (8), Environment and Landscape (12), Community (15), Housing (8) and Sustainability (3). Where relevant in this report, these Design Codes are referenced by their theme and number, e.g. CO.14. The Character Areas and Design Codes are well summarised at paragraphs 8.34-8.39. Nevertheless, for users of the Plan and those preparing development proposals, it is essential that the Design Codes document is made easily accessible via a link in the Plan itself and also via **the Forum's website**. I recommend two focused amendments to the policy text to address that point and also to address a representation made by the Council. These amendments are addressed by proposed modification PM4.

- 4.31 Policy ND6 (Provision of Energy Efficient Buildings) states that the design and standard of any new building should aim to meet a high level of sustainable design and construction and be optimised for energy-efficiency, targeting net zero operational carbon emissions. It goes on to state that relevant information should be included as part of the Design and Access Statement accompanying a planning application, to include measures which could include siting and orientation to optimise passive solar gain, the use of thermally efficient building materials, energy efficient measures such as loft and wall insulation and the incorporation of on-site energy generation from renewable sources.
- 4.32 The Council has made a number of detailed comments regarding the text of the draft, pointing out that elements of the policy presently exceed both national and local policy requirements, for example as contained in Part L of the Building Regulations (introduced in June 2022) and Policies SD7 and SD8 of the adopted RLP. I have given careful consideration to these points, but I consider that the policy is suitably qualified by the fact **that it "should aim"** to meet a high level of sustainable design and construction and be optimised for energy efficiency. This is in line with **the Government's direction of travel for developments to be net zero** operational carbon, which is the primary purpose of this policy and which I view as a desirable intention. Accordingly, I do not recommend any major revisions to the policy. I do, however, recommend certain amendments to the policy text to further qualify its requirements, in the context of current national and local policies, and to ensure clarity for users of the Plan. These amendments are set out at PM5.
- 4.33 With recommended modifications PM1-PM5, I consider that the draft **Plan's section on New Development and its accompanying policies (Policies ND1-ND6)** is in general conformity with the strategic policies of the RLP,

has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Character of the Rural Setting

- 4.34 Section 9 of the Plan addresses the theme of the Character of the Rural Setting and contains two policies (Policies C1 and C2). These policies focus on retaining the rural character of the setting of Englefield Green Village and the views of particular importance, defined as Special Views, within the Plan area.
- 4.35 Policy C1 (Retaining the Rural Character) states that the rural character of the setting of the village should be respected through new development by ensuring that proposals are assessed against national and local Green Belt policies, that the scale and character of new buildings are in keeping with the setting, that on redevelopment sites the access arrangements, boundary treatments and landscaping retain the rural character of the setting and that proposals take advantage of the local topography, landscape, trees and water features in the vicinity of the site. I am satisfied that the policy is appropriately drafted and justified,
- 4.36 Policy C2 (Special Views) states that views of particular importance, which are defined as Special Views on the Policies Map within the Plan area, should be preserved and not be obstructed by new development. A series of 18 Special Views are identified in the policy text, and the viewpoints are notated on the 'Policies Map View Points' (Maps 1 and 2) at Annex B. I confirmed from my site visit that all of the viewpoints are within the Plan area. The policy also goes on to state that proposals that would enhance or make a positive **contribution to the Neighbourhood Area's views will be supported.**
- 4.37 I am satisfied that the policy is appropriately drafted and supported by the evidence contained in the accompanying '*Views Report*', **prepared by** the Forum in August 2022. However, for users of the Plan, the interpretation of the specific Special Views, as listed in the policy and shown on Maps 1 and 2, is difficult. The maps need to be improved, not least by the addition of notations showing the reference number of the views (e.g. AF1) for each of the viewpoints, in order to provide the necessary clarity for users of the Plan. I recommend a modification to that effect as PM6.
- 4.38 With recommended modification PM6, **I consider that the draft Plan's** section on Character of the Rural Setting and its accompanying policies (Policies C1 and C2) is in general conformity with the strategic policies of the RLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Historic Environment

- 4.39 Section 10 of the Plan addresses the theme of the Historic Environment within the Plan area and contains two policies (Policies HE1 and HE2). These policies focus on the Englefield Green Conservation Area and its setting and local heritage assets.
- 4.40 Policy HE1 (Conservation Area and its Setting) states that development within or affecting the setting of the Englefield Green Conservation Area should achieve the highest quality design, set in a clear context in terms of materials, scale, setting and layout. It then sets out three criteria for the satisfactory design of proposed new buildings and extensions and stipulates that a Design and Access Statement (DAS) and/or a Heritage Statement should be submitted with planning applications to set out how the design criteria have been addressed.
- 4.41 In my assessment of this policy, I have also taken account of the consultation version of the Englefield Green Conservation Area Appraisal and Management Plan (CAAMP), which was published by the Council during the course of this examination. Section 9.4 of the CAAMP provides detailed policy guidance on design and new development, referring to the Design Codes prepared for this Plan. I do not identify any conflicts between this policy and the draft CAAMP, but a future review of the Plan should take the approved document into account.
- 4.42 I am satisfied that the policy is appropriate and justified, but three focused amendments are necessary to the policy text to provide clarity for users of the Plan, and to refer to the emerging CAAMP. These amendments are addressed by recommended modification PM7.
- 4.43 Policy HE2 (Protecting and Enhancing Local Heritage Assets) states that all development proposals affecting identified local heritage assets, set out at Annex D to the Plan, will be required to take into account the character, context and setting of the assets. Annex D (Local Heritage Assets) contains a listing of 161 sites (containing buildings, structures, signs and pieces of art) within the Plan area which are proposed for designation as Non-Designated Heritage Assets (NDHAs). This listing includes 14 sites which are already designated as NDHAs by the Council in its Local List of NDHAs. However, the number of specific properties covered by the 161 sites is significantly higher as a number of sites contain several residential properties, e.g., Site No. 37 contains four dwellings. The policy and Annex D are supported by a study entitled "*A Survey of Non-Designated Heritage Assets in Englefield Green Forum Area*" (December 2021 and updated in December 2022) prepared by the Forum.
- 4.44 The Council made extensive representations concerning this policy and the listing at Annex D, and in particular drew my attention to Historic England's Advice Note (HEAN7) on "*Local Heritage Listing: Identifying and Conserving Local Heritage*" and the extent to which this had formed part

of a rigorous assessment process for the identification of the 161 sites listed at Annex D.

- 4.45 **Upon my initial assessment of the Plan, I shared the Council's concerns,** particularly in the context of the fact that the current Local List of NDHAs for the whole of Runnymede Borough covers ca. 120 entries. This suggested to me that the methodology, assessment and compilation of the supporting evidence document, and thus Annex D in the draft Plan, had not been undertaken with sufficient rigour in the context of **Historic England's advice and other** research. In particular, I was concerned at the concentrations of many residential properties in a number of streets within the village.
- 4.46 I therefore raised Question No. 2 (see paragraph 2.8 above) and invited the Forum to review the content of the supporting document and to prepare a note for me identifying the eligibility of each of the buildings and structures in terms of their importance according to the following criteria (as set out in HEAN7): Asset Type; Age; Rarity; Architectural and Artistic Interest; Group Value; Archaeological Value; Historic Interest; and, Landmark Status. (I further noted that it would not be necessary to repeat the justification contained in the supporting document, but I would expect the note to take account of the comments contained in the **Council's representations to Policy HE2 and its supporting text on this matter**). The Forum responded to me on 28 May 2023 including a revision to Annex D, which categorised each of the 161 sites against HEAN7 criteria except for those already locally listed by the Council. The response noted that a full review of the supporting document was being undertaken. (This preliminary response still included assets which were subsequently excluded as part of the full review). A further response from the Forum, dated 30 June 2023, and following the above-mentioned full review, included a further revision to Annex D which proposed the removal of 70 properties and one structure (a pillar box) from the original listing. The revised listing comprised 106 sites containing 182 assets. The **Forum commented that it did not accept in full the Council's concerns** regarding a number of the proposed NDHAs.
- 4.47 I have also taken note of the concerns expressed by Surrey County Council regarding the proposed NDHAs, which were also expressed at the **Regulation 14 consultation stage. The County Council's view is that some** of the entries listed at Annex D do not satisfy the national criteria and thus risks damaging the value of Local Listing overall, and also that their status on the list would have diminished planning weight should they come under detailed scrutiny. I have also noted the representation by the RHUL that site no. 58 (Sutherland Lodge) is Grade II listed (and therefore a registered asset). Subsequent research by the Council and myself has confirmed that this building is Grade II listed by virtue of its situation within the curtilage of Sutherland House. This site should therefore be removed from the listing at Annex D and from the supporting document.

4.48 As far as possible, and in light of the representations summarised above, I viewed the proposed NDHAs during the course of my site visit, in order to establish the types of property and structures being proposed as NDHAs.

4.49 The Council wrote to me again on 11 July 2023 requesting that I provide an opportunity for the Council to respond to this amended document. I agreed to this request (with a deadline of 4 August 2023) and I commented that I had hoped to see a greater level of collaborative working between the Forum and the Council on this issue, having regard to the relevant advice in the PPG.

4.50 The Council wrote to me again on 27 July 2023 confirming that Council officers had met with members of the Forum on 18 July 2023 and had reached agreement on the following matters:

“Both parties agreed that:

- the Council would propose amendments be made to the submitted Englefield Green Village Neighbourhood Plan Policy HE2, its supporting text, and Annex D to refer to a proposed list of NDHAs which would be subject to further review after adoption of the Neighbourhood Plan for consideration for inclusion on the Local List – suggested amendments are attached to this letter at Annex 1.*
- The Council would identify, procure and fund (subject to receiving reasonable quotes) specialist expertise to objectively review the proposed NDHA list to recommend a refined list of NDHAs for inclusion on the Local List.”*

4.51 Annex 1 to the **Council’s** letter sets out proposed amendments to paragraphs 0.7 and 10.8 and to the policy text, and to the content of Annex D to the Plan, to reflect the agreements set out above. I have given careful consideration to these proposed amendments and, following my own assessment of the draft policy, its supporting justification and the supporting study, I conclude that the amendments being proposed by the Council are appropriate. I therefore recommend that those amendments be made to the draft Plan as set out in recommended modification PM8. (The text of amended paragraphs 10.7 and 10.8, and of Policy HE2 is reproduced in full at PM8 for ease of reference. For clarification, the content of Annex D should now comprise the revised list of proposed **NDHAs provided in the Forum’s response dated 30 June 2023, but** excluding the 14 assets within the Plan area already identified on the **Council’s Local** List. See also paragraphs 4.26 and 4.91. However, the **revised list supplied as part of the Forum’s response is not in the form of a** direct revision to Annex D and it will therefore be necessary to redraft Annex D appropriately, as indicated at PM8).

4.52 With recommended modifications PM7 and PM8, I consider that the draft **Plan’s section on** the Historic Environment and its accompanying policies (Policies HE1 and HE2) is in general conformity with the strategic policies of the RLP, has regard to national guidance, would contribute to the

achievement of sustainable development and so would meet the Basic Conditions.

Natural Environment

- 4.53 Section 11 of the Plan addresses the important theme of the Natural Environment within the Plan area and contains three policies (Policies NE1-NE3). These policies cover the topics of green and blue infrastructure, biodiversity and trees, hedgerows and planting.
- 4.54 Policy NE1 (Green and Blue Infrastructure) states that all new proposals for built development except for minor extensions to dwellings must be accompanied by a green and blue infrastructure plan to support a planning application, taking account of the Biodiversity Report (ref. *'Biodiversity and Green Spaces in Englefield Green'* prepared by the Surrey Wildlife Trust in February 2022). It goes on to state that proposals will be supported where the green and blue infrastructure network will be enhanced to increase connectivity between the site, Biodiversity Opportunity Areas, corridors and across the landscape.
- 4.55 The Council has made representations concerning this policy and also concerning paragraphs 11.8-11.10 of the supporting justification, which it considers contain policy requirements that are not set out within the policy itself.
- 4.56 I have given careful consideration to this draft policy and to its supporting **justification. In addition to the Council's concerns, I am also concerned** that the policy does not make reference to the Green and Blue Infrastructure Supplementary Planning Document (SPD), adopted by the Council in November 2021. In my assessment, paragraphs 11.6, 11.8 and 11.9 do require some amendments, in order to remove material that could be viewed by users of the Plan as being a policy requirement, and also to the policy itself in order to clarify its requirements, particularly **with regard to the delivery of 'offset' green** and blue infrastructure. Recommended modification PM9 addresses the necessary amendments.
- 4.57 Policy NE2 (Biodiversity) states that new development (where relevant) will be required to protect and enhance existing natural features of sites and provide 20% net gain in biodiversity where this is viable and feasible, but if this is not achievable at least 10% net gain in line with national requirements. It goes on to state that a 15-metre buffer will be encouraged for the protection of statutory and non-statutory designated sites and habitats of principal importance. The Council has also raised some significant representations regarding this policy which I have taken into consideration.
- 4.58 In my assessment, the policy and parts of its supporting justification do potentially exceed the requirements of national policy guidance and, from everything that I have seen and read, I have not seen the necessary **justification, and in particular viability evidence, to support the draft Plan's**

requirements. Accordingly, I consider that some amendments are necessary to paragraphs 11.14 and 11.15 of the supporting text, and to the policy text. These amendments are addressed by recommended modification PM10.

- 4.59 Policy NE3 (Trees, Hedgerows and Planting) states that the provision of new trees, hedgerows and planters throughout the Plan area will be encouraged and supported. It goes on to set out requirements for the planting of replacement trees, where there is the unavoidable removal or loss of trees on development sites, and for tree planting for new dwellings.
- 4.60 As with Policies NE1 and NE2, the Council has made representations concerning this policy, and considers that its requirements exceed both national and local policy requirements. In my assessment, the policy text should be amended to align more closely with national and local policy guidance. I therefore recommend modification PM11 to address those amendments.
- 4.61 With recommended modifications PM9-PM11, I consider that the draft **Plan's section on the Natural Environment and its accompanying policies** (Policies NE1-NE3) is in general conformity with the strategic policies of the RLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Community Facilities

- 4.62 Section 12 addresses the theme of Community Facilities and contains two policies (Policies CF1 and CF2) which address community facilities within the Plan area and proposed Local Green Spaces.
- 4.63 Policy CF1 (Community Facilities) states that nine community facilities (listed in the policy) will be retained and planning applications which result in either their loss or significant harm will be resisted. It further states **that if the facilities' continued use is no longer viable and evidence** given that the facility is no longer needed or that alternative facilities can be provided, other uses may be supported. The policy also encourages the provision of new community facilities, and also that proposals to improve the viability of a community facility by way of the extension or partial replacement or redevelopment of buildings, structures and land will be supported. The Council propose a minor amendment to the policy text to ensure that the policy is in general conformity with the strategic policies of the Development Plan. I agree with that amendment and recommend some further focused amendments to secure clarity. These are addressed by recommended modification PM12.
- 4.64 Policy CF2 (Local Green Spaces) proposes the designation of four Local **Green Spaces in the Plan area, namely St. Jude's Church Cemetery (Englefield Green Cemetery), St. Jude's Junior School Playing Fields, St. Cuthbert's Catholic Primary School Playing Fields and St. Jude's Church of**

England Infant School Playing Fields. For completeness, the policy also lists the RHUL Arboretum, which has previously been designated as a Local Green Space in the adopted RLP. Policies Inset Map 1 at Annex B to the Plan shows the location of the five sites, but not at a scale where it is possible to identify the precise boundaries of each site.

4.65 As Question No. 4, I noted from the draft policy and from Map 1 that three school playing fields are identified as proposed Local Green Spaces. I therefore requested that the Forum advise me whether there is any additional use of these playing fields by the local community for non-school purposes. I also requested larger-scale plans showing the proposed boundaries for each of the proposed Local Green Spaces, which in the case of the three school playing fields should clearly define that the Local Green Space designation would only cover the playing fields and no other part of the school premises or its curtilage. I have taken account of **the Forum's response on this matter, and also the five larger-scale maps (including the RHUL Arboretum) provided by the Council on behalf of the Forum.**

4.66 I visited each of the four sites listed above during the course of my site visit and have assessed the proposed designation of those sites as a Local Green Space against the criteria set out in the NPPF (at paragraph 102)¹², which states that the Local Green Space designation should only be used where the green space is:

- "a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land."*

In my assessment, the four sites do all meet the above criteria, and therefore, I recommend that they be designated as Local Green Spaces within the policy.

4.67 With regard to the policy text, and specifically in relation to managing development within a Local Green Space, this should be consistent with those for Green Belts (NPPF paragraph 103). Therefore, I recommend that the policy text as drafted be modified to reflect that requirement. Recommended modification PM13 addresses the necessary amendments to Policy CF2, together with the inclusion of the five larger-scale maps provided on behalf of the Forum by the Council (in the response dated 24 May 2023) at Annex B to the Plan. (The larger-scale maps show the correct boundaries for each of the Local Green Spaces, but existing Policies Inset Map 1 in the Plan does not show those boundaries correctly. It will be necessary to amend that Inset Map as part of the further

¹² NPPF, paragraph 101, further states that Local Green Space should be capable of enduring beyond the end of the Plan period.

consequential changes to the Plan arising from this report and its recommended modifications – see paragraph 4.92 below).

- 4.68 With recommended modifications PM12 and PM13, I consider that the **draft Plan's section on** Community Facilities and its accompanying policies (Policies CF1 and CF2) is in general conformity with the strategic policies of the RLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Employment and Services

- 4.69 Section 13 of the Plan covers the theme of Employment and Services within the Plan area and contains three policies (Policies ES1-ES3) covering Supporting Local Employment, Local Centres and Commercial Facilities and Public Houses.
- 4.70 Policy ES1 (Supporting Local Employment) states that proposals for the development of new businesses and for the expansion or diversification of existing businesses, including tourist-based operations, will be encouraged, subject to satisfying four criteria concerning the scale and impact of the proposals. It goes on to state that applications for extensions or part change of use of dwellings to enable flexible or home working will be supported, subject to there being appropriate parking and that the residential amenity of neighbouring properties is maintained.
- 4.71 In my assessment, the policy is appropriately drafted, although I noted that it does not contain a requirement to provide adequate car parking as part of development proposals for new and expanding businesses. I have sought to rectify that omission, in part, by the extension of Policy TT1 to also cover non-residential uses (see paragraph 4.81 below and PM17). However, I consider that the policy should also make a clear reference to the need to provide adequate car parking and provision for bicycle spaces (see also Policy TT2) as part of any development proposals. This additional requirement is addressed by recommended modification PM14.
- 4.72 Policy ES2 (Local Centre and Commercial Facilities) states that retail **development will be supported at St Jude's Road** and Victoria Street in the Englefield Green Local Centre, as defined on Map 3 at page 44. It goes on to state that within the Local Centre boundary, changes of use from Class E uses will be accepted where Class E uses remain at 80% of all units; the loss of Class E premises will be resisted, unless it can be demonstrated that reasonable efforts have been made to secure their continued use for these purposes; and that historic shopfronts should be retained with new shopfronts and advertisements being of a high quality and reflecting the provisions set out in the Design Codes (see also paragraph 4.30 above). I note, however, that no monitoring indicator is in place in the Plan to confirm whether Class E uses within the Local Centre are maintained at a level of 80% over the duration of the Plan period. I consider that Annex E (**which is a 'snapshot' of existing uses at**

April 2022) provides a template for the Forum to monitor changes over the Plan period, probably on an annual basis.

- 4.73 I consider that the policy is appropriately drafted and justified and reflects an Aim of the Plan to support local businesses and shops and enable people to shop locally. I consider that two amendments are necessary to the policy text, in order to improve its clarity for future users of the Plan, and these are addressed by recommended modification PM15.
- 4.74 Policy ES3 (Public Houses) states that the loss of public houses will be resisted, unless it can be demonstrated that reasonable efforts have been made to secure their continued use for these purposes, and it can be demonstrated that the continued use is no longer viable. Alterations and extensions to public houses to support their continued use will be supported provided that there is no unacceptable adverse impact on the historic character of the building or area, the amenities of neighbouring properties and the immediate road network. I consider that the policy is appropriately drafted and justified, and I note that there is not an equivalent policy in the adopted Local Plan.
- 4.75 With recommended modifications PM14 and PM15, I consider that the **draft Plan's section on** Employment and Services and its accompanying policies (Policies ES1-ES3) is in general conformity with the strategic policies of the RLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Infrastructure Provision

- 4.76 Section 14 of the Plan addresses the theme of Infrastructure Provision and contains one policy (Policies I1) which focuses on infrastructure for new development within the Plan area.
- 4.77 Policy I1 (Infrastructure for New Development) states that development proposals must, through Section 106 agreements, Community Infrastructure Levy or other mechanisms, provide for timely delivery of essential infrastructure needs arising from the scheme, and then lists potential types of infrastructure reflecting local priorities that may be included.
- 4.78 As drafted, I consider that the policy is flawed, in that it fails to provide sufficiently clear policy guidance for users of the Plan on the provision of infrastructure to support new developments within the Plan area. The policy is presently drafted more in the form of an aspirational statement rather than as an effective planning policy and provides no clarity on the definition of essential infrastructure needs. It also fails to refer to the relevant policies of the adopted RLP (**and the Council's Infrastructure Delivery & Prioritisation SPD**), with which this policy should be aligned. In order to satisfy the Basic Conditions, I consider that the policy should be redrafted and recommended modification PM16 addresses this matter.

- 4.79 With recommended modification PM16, I consider that the draft **Plan's section on Infrastructure Provision and its accompanying policy** (Policy I1) is in general conformity with the strategic policies of the RLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Traffic and Transport

- 4.80 Section 15 of the Plan addresses the theme of Traffic and Transport in the Plan area, and contains three policies (Policies TT1-TT3) covering the issues of car use and parking, storage facilities for bicycles and mobility aids in residential developments and provision for pedestrians, cyclists and horse riders.
- 4.81 Policy TT1 (Car Parking) states that proposals for all new housing **developments will provide parking in line with the Council's parking** standards, and have adequate on-site parking to meet current and future needs. It goes on to state that electric charging points for cars should be incorporated in new housing developments providing one socket for each new dwelling. I am satisfied that the policy is appropriate and reflects national and local policies. However, in my assessment, the policy should also apply to non-residential developments in the Plan area, and therefore I recommend a focused amendment to the policy text accordingly. This is addressed by recommended modification PM17.
- 4.82 Policy TT2 (Storage for Bicycles and Mobility Aids) states that residential development proposals for new build or change of use should provide storage facilities for cycle and mobility aids and sets out four criteria to ensure that appropriate storage facilities are provided. As drafted, in my view the **policy is defective, as it states that it concerns "storage facilities for cycles and mobility aids"** but it then goes on to require cycle parking in **line with the Council's standards. This is a different** policy matter to the storage of bicycles, which could be undertaken inside a property. In my assessment, the policy should be redrafted to clarify its requirements, for the benefit of future users of the Plan. As with Policy TT1, I consider that this policy should also be applicable to non-residential developments in the Plan area. Recommended modification PM18 sets out the necessary revisions to this policy.
- 4.83 Policy TT3 (Provision for Pedestrians, Cyclists and Horse Riders) states that new development should include measures that keep traffic speeds low and improve the provision of pavements and access for pedestrians and cyclists and horse riders. It goes on to state that, where proposed, new roads, junctions, pavements and traffic management measures should be designed to be accessible, safe and complement the character of the immediate area and, where appropriate, reflect local heritage. The Council has raised a representation concerning the content of this policy, and, in my assessment, the policy, as drafted, exceeds the requirements for many categories of development proposals. For example, it is impractical and excessive to expect most small-scale developments, such

as residential extensions, to include the measures set out within this policy. I consider that the policy requires comprehensive amendment and recommended modification PM19 addresses this.

- 4.84 With recommended modifications PM17-PM19, I consider that the draft **Plan's section on** Traffic and Transport and its accompanying policies (Policies TT1-TT3) is in general conformity with the strategic policies of the RLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Royal Holloway University of London

- 4.85 Section 16 of the Plan specifically addresses the RHUL campus and other facilities within the Plan area and contains one policy (Policy RHUL1). RHUL is the largest educational establishment in Runnymede Borough and is planning to expand its number of students to 12,000 by 2031. The **University's growth is supported by a 20-year University Masterplan** prepared in 2014, which has since been subject to a number of revisions. The key issues for the community of Englefield Green are the movement of University students and staff and their vehicles through the area. Paragraph 16.6 in the Plan notes that new RHUL developments must create permeable networks of connections within development sites as well as connecting to the wider locality, the centre of the village, key existing amenities and to any existing cycle lanes and public footpaths.
- 4.86 RHUL have made representations to a number of sections within the Plan, which I have taken into consideration as part of my own assessment. With regard to this section of the Plan, RHUL point out that outline planning permission was granted on 5 April 2015 with the Masterplan referenced above underpinning the development proposals then approved. Subsequent reserved matters applications have addressed the detailed design of elements of the approved development. RHUL express concern that the Plan does not refer to the extant planning permission, which has also facilitated financial contributions towards various off-site highway improvements in the wider area. RHUL also comment that Design Code CO-06 "**Students**" **does not replace or supersede matters approved by the** underlying planning permission. The Council also make representations to the effect that the first paragraph of policy text does not establish a positive framework for sustainable development by RHUL.
- 4.87 From my own assessment of this policy and the representations that have been submitted, I consider that the policy does need to provide a more positive planning framework for the consideration of future proposals that may be submitted by RHUL during the Plan period. The University is a very significant employer within the Plan area, and generates substantial benefits for the local economy, both directly and indirectly, and I consider that the policy does need to reflect that context, whilst seeking to achieve sustainable patterns of development for the University and its related requirements. I therefore recommend a series of amendments to the

policy text to take account of my assessment. These are addressed by recommended modification PM20. I do not recommend any amendments to the supporting text at paragraphs 16.4-16.6, as I am satisfied that they reflect the concerns that have been expressed by the Englefield Green community during the preparation of the Plan, although a number of those concerns are not planning considerations.

Aspirations, Implementation and Monitoring

- 4.88 Section 17 of the Plan sets out details of the various aspirations that the Forum is taking forward for the future of Englefield Green Village and its wider area. It then describes how the Forum will work in partnership with key stakeholders, including the Council, Surrey County Council, the Environment Agency and RHUL to achieve the successful implementation of the Plan. It provides details of the funding and implementation mechanisms, for example the Community Infrastructure Levy and Section 106 agreements, that are in place within Runnymede borough to assist with securing new community infrastructure. It also includes a short section on monitoring and review, noting that the Forum will report on the implementation of the Plan every five years and then determine whether a formal review of the Plan will be required. I am satisfied that this section addresses the issues of implementation, monitoring and review adequately, but I recommend that it should also make a specific reference to the emerging review of the RLP (see also paragraph 3.5 above), and this is addressed by recommended modification PM21.
- 4.89 As part of my initial assessment of the Plan and the representations submitted at the Regulation 16 consultation stage, I noted that a significant number of representations had been made concerning one of the aspirations set out in Section 17, namely to create an identifiable centre to the village of Englefield Green, and known as the Central Area Remodelling Scheme, which would potentially include the remodelling of **St Jude's Road between Bond Street and the A30, including traffic management, cycle and pedestrian provision, public realm improvements and improved signage. The supporting study entitled, "Englefield Green Placemaking & Movement"**, prepared by i-Transport LLP in September 2022, contains indicative drawings to illustrate how such works could be achieved as part of the wider aspiration. A number of the representations also raise detailed concerns regarding this supporting study.
- 4.90 The principal matter raised in representations on this matter concerned the impact of potential highway and public realm works on land presently comprising Englefield Green Cemetery and the site of the War Memorial. Having noted the strength of view expressed in some representations, I raised this matter with the Forum and the Council as Question No. 1 (see paragraph 2.8 above). Both the Forum and the Council confirmed in their responses to me that the project is purely aspirational at this stage, has not been discussed with either the Council or Surrey County Council (as highways authority), has no budgetary provision and will require detailed survey and design work if it is to be taken forward at a future date. On

the basis of those responses, I am entirely satisfied that the project does only constitute an aspiration at the present time. However, during the course of my site visit, I did visit the area to identify the areas described in the representations. Both the Forum and the Council should note that, at paragraph 4.66 above, I do recommend that the Englefield Green Cemetery be designated as a Local Green Space, with the boundaries as defined on the map (scale 1:2500) supplied by the Council. The Forum should also take note of the representations that have been submitted regarding this aspiration in the Plan. I do not make any further comments on this or any of the other aspirations set out in this section of the Plan, as they are not proposed land-use planning policies.¹³

Other Matters

- 4.91 The Plan contains six Annexes. Annex A is a table of Aims and Policies, with references to the relevant background documents. Annex B is the map section containing the Policies Map with an inset map of the south-eastern part of the Plan area, and two maps showing the viewpoints for the Views of Particular Importance. Annex C is a map of the Plan area showing the extent of the areas covered by the Rural Areas Design Code Zone, the Historic Core Design Code Zone, the Urban Area Design Code Zone and the University South Design Code Zone. Annex D is a listing of the 161 buildings and structures proposed in the Plan for designation as NDHAs. Annex E is an audit of existing Class E and Sui Generis units in the Plan area. Annex F is a Glossary of planning terms and acronyms. I recommend, as part of proposed modification PM8 (see paragraph 4.51 above) that the content of Annex D be amended.
- 4.92 As an advisory comment, when the Plan is being redrafted to take account of the recommended modifications in this report, it should be re-checked for any typographical errors and any other consequential changes, etc. Minor amendments to the text and numbering (sections, paragraphs etc.) can be made consequential to the recommended modifications, alongside any other minor non-material changes or updates, in agreement between the Forum and the Council.¹⁴

Concluding Remarks

- 4.93 I conclude that, with the recommended modifications to the Plan as summarised above and set out in full in the accompanying Appendix, the Englefield Green Village Neighbourhood Development Plan 2022-2030 meets the Basic Conditions for neighbourhood plans.

¹³ See PPG Reference ID: 41-004-20190509.

¹⁴ PPG Reference ID: 41-106-20190509.

5. Conclusions

Summary

- 5.1 The Englefield Green Village Neighbourhood Development Plan 2022-2030 has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the Plan, and the supporting documents submitted with the Plan together with the Forum and Council's responses to my questions.
- 5.2 I have made recommendations to modify certain policies and other matters to ensure that the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. I conclude that the Englefield Green Village Neighbourhood Development Plan 2022-2030, as modified, has no policy or proposal which I consider to be significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond that boundary. I therefore recommend that the boundary for the purposes of any future referendum on the Plan, should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.4 It is clear that the Englefield Green Village Neighbourhood Development Plan 2022-2030 is the product of much hard work undertaken since 2019 by the Neighbourhood Forum, its Neighbourhood Plan Steering Committee and the many individuals and stakeholders who have contributed to the preparation and development of the Plan. In my assessment, the Plan reflects the land use aspirations and objectives of the Englefield Green community for the future planning of their area up to 2030. The output is a Plan which should help guide the **area's** development over that period, making a positive contribution to informing decision-making on planning applications by Runnymede Borough Council.

Derek Stebbing

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Pages 22, 60 and 61	<p><u>Policy ND1 – Development within the Settlement Boundary</u></p> <p>Delete the words “(i.e. outside the Green Belt boundary)” in the first paragraph of policy text and relace with “as defined on the Policies Map at Annex B”.</p> <p>Delete the second paragraph of policy text in full and replace with:</p> <p>“All proposals should satisfy the requirements of other relevant policies in this Plan, and not result in any significant adverse impacts on the amenities of the occupiers of neighbouring properties. Where such adverse impacts are identified, mitigation measures will be required as part of the development proposals in order to reduce those impacts to acceptable levels.”</p> <p>Add new third paragraph of policy text to read as follows:</p> <p>“Proposals which contribute to achieving sustainable development, for example by reducing car usage and incorporating high standards of sustainable construction and energy-efficiency, will be supported.”</p> <p><u>Annex B – Maps</u></p> <p>Include a clear definition of the Settlement Boundary with accompanying notation on the Policies Map and on the Policies Inset Map 1.</p>
PM2	Page 24	<p><u>Policy ND3 – Blays Lane/Wick Road Allocated Site</u></p> <p>Amend policy text to read as follows:</p> <p>“Proposals for the development of this site will be supported where they have regard to the design vision, concept and principles contained in the supporting Englefield Green</p>

		Masterplan Document (dated December 2022) and the Englefield Green Design Codes (dated January 2023), and also taking account of the technical studies required by Policy SL5 in the adopted Runnymede Local Plan.”
PM3	Pages 24 and 25	<p><u>Policy ND4 – Coopers Hill Site</u></p> <p>Amend title of policy and the sub-heading preceding paragraph 8.22 to read: “RHUL Kingswood Hall Site, Cooper’s Hill Lane” and amend Contents Page accordingly.</p> <p>Delete paragraphs 8.26-8.29 in full.</p> <p>Delete policy text in full and replace with:</p> <p>“Proposals for development or redevelopment of the previously developed land at this site will be considered in the context of national and local policies concerning development within the designated Green Belt, and with regard to other relevant Policies in this Plan.</p> <p>In view of the site’s sensitive location and the constraints affecting new development at the site, which are described more fully at paragraphs 8.22/8.23 above and in the supporting Englefield Green Masterplan Document (dated December 2022), development proposals will only be supported if they can clearly demonstrate the very special circumstances necessary to justify the development or redevelopment.”</p>
PM4	Page 28	<p><u>Policy ND5 – High Quality Design</u></p> <p>Delete the word “must” in the first line of the second paragraph of policy text and replace with “should, wherever possible,</p> <p>Add new third paragraph of policy text to read as follows:</p> <p>“The Englefield Green Design Codes document can be viewed at: Design-Codes-V3-Reg-16.pdf (egvplan.org.uk) ”</p>
PM5	Page 29	<u>Policy ND6 – Provision of Energy Efficient Buildings</u>

		<p>Delete the word “must” in the third line of text in the first paragraph of the policy text and replace with “should”.</p> <p>Place third paragraph of policy text as new second paragraph of text.</p> <p>Place second paragraph of policy text as new third paragraph of text, and amend text to read as follows:</p> <p>“Relevant information should be submitted, where required in relation to the scale and type of development being proposed, in an Energy Statement and/or in a Design and Access Statement accompanying planning applications.”</p> <p>Place fourth paragraph of policy text as new third sentence to the first paragraph of text.</p> <p>Add new final paragraph of policy text to read as follows:</p> <p>“In addition to the planning requirements set out within this Policy, proposals will also need to comply with national Building Regulations standards.”</p>
PM6	Pages 62 and 63	<p><u>Policy C2 – Special Views and Annex B (Maps)</u></p> <p><u>Policies Map View Points (Maps 1 and 2)</u></p> <p>Add notations to these maps to clearly identify the reference number of each viewpoint, as listed in the policy text.</p>
PM7	Page 32	<p><u>Policy HE1 – Conservation Area and its Setting</u></p> <p>Insert the words “Englefield Green” before the words “Conservation Area” in the first line of policy text.</p> <p>Insert the words “as defined on the Policies Map at Annex B” after the words “Conservation Area” in the first line of policy text.</p> <p>Add new third paragraph of policy text to read as follows:</p> <p>“Development proposals should also take account of the policy guidance contained in the emerging Englefield Green Conservation</p>

		Area Appraisal and Management Plan, which was published for consultation in July 2023.”
PM8	Pages 32 and 33 and Annex D (Pages 65-70)	<p><u>Policy HE2 – Protecting and Enhancing Local Heritage Assets</u></p> <p>Replace existing paragraphs 10.7 and 10.8 with the following text:</p> <p>“10.7 Neighbourhood Plans may also identify important heritage assets which are not already protected by statutory listing. Local Plan Policy EE8 protects locally listed buildings and other non-designated heritage assets (NDHAs) from harmful development. The list of proposed non-designated heritage assets was compiled alongside the completion of the Design Codes and is set out in a supporting document to this Plan. The proposed buildings and features identified in this list, which may not be of sufficient architectural or historical merit to justify listing, are nonetheless an important part of the character of the Area.</p> <p>The full report, titled ‘A Survey of Non-Designated Heritage Assets in Englefield Green Forum Area’ is a technical background document to the Neighbourhood Plan and includes the process and criteria for qualification. The report is available here:</p> <p>https://egvplan.org.uk/wp-content/uploads/2023/01/NDHA-Sites-V2-Final-Reg-16.pdf</p> <p>This evidence will be subject to further review by RBC, in conjunction with its specialist historic building advisors, to identify additional NDHAs for the Neighbourhood Area. Policy HE2 will help to ensure that all the assets listed which are currently on the Local List plus those confirmed as additional NDHAs by RBC, subsequent to the adoption of the Neighbourhood Plan, are protected as far as possible and that any development which could affect the assets will be carefully considered.</p> <p>10.8 Once refined further and adopted by RBC, the list may be changed over time as other</p>

	<p>buildings and structures, assessed by RBC's specialist advisors, are added to the list. Enhancements to the local features may be sought through funding bids to support their management.”</p> <p>Replace the existing policy text with the following text:</p> <p>“All development proposals affecting identified local heritage assets, including non-designated heritage assets¹⁵ will be required to take into account the character, context and setting of the assets. Development should be designed taking account of local styles, materials and detail. The effect of an application on the significance of an identified local heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect a local heritage asset, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset concerned.”</p> <p>Insert the following footnote at the foot of Page 33:</p> <p>¹³ Available on the Council's website at: www.runnymede.gov.uk/planning-policy/conservation-areas-listedbuildings/3</p> <p><u>Annex D</u></p> <p>Amend title to read:</p> <p>“Proposed Local Heritage Assets for Further Review”</p> <p>Amend sub-title to read:</p> <p>“Englefield Green – Proposed Non-designated Heritage Assets (NDHAs)”</p> <p>Amend and redraft the content of Annex D to reflect the updated listing of proposed NDHAs (dated 21 June 2023) provided in the Forum's response to Question No. 2 dated 30 June 2023, but delete the 14 existing assets contained on Runnymede</p>
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		Borough Council's Local List and site no. 58 (Sutherland Lodge) from that listing.
PM9	Pages 34 and 35	<p><u>Paragraphs 11.6/11.8/11.9 and Policy NE1 – Green and Blue Infrastructure</u></p> <p>Paragraph 11.6 – delete existing text in full, and replace with:</p> <p>“Proposals for new development in the Plan area should take account of this SPD at the planning stage. This involves three steps: Step 1 – auditing the existing assets; Step 2 – considering GBI opportunities; Step 3 – incorporating GBI into the development proposals.”</p> <p>Paragraph 11.8 – delete 4th sentence of text in full.</p> <p>Paragraph 11.9 – amend 1st sentence of text to read:</p> <p>“In order to build on RBC’s GBI Strategy SPD, Surrey Wildlife Trust Ecology Services reviewed the available ecological information for Englefield Green Village to identify key areas for GBI and biodiversity enhancement within the Plan area.”</p> <p>Paragraph 11.9 – add new 5th sentence to read:</p> <p>“The Surrey Wildlife Trust study (insert web-site link to the document <u>here</u>) should be used to assist in identifying opportunities for potential GBI offsetting on sites within the Plan area.”</p> <p><u>Policy NE1</u></p> <p>Delete first paragraph of policy text, and replace with:</p> <p>“Proposals for new development in the Plan area should take account of Runnymede Borough Council’s Green and Blue Infrastructure Supplementary Planning Document (SPD) and the supporting document to this Plan entitled ‘Biodiversity and Green Spaces in Englefield Green’.</p> <p>Delete third paragraph of policy text, and replace with:</p>

		<p>"Where development proposals cannot deliver green and blue infrastructure, opportunities should be identified to offset green and blue infrastructure improvements and enhancements, which will be secured by S.106 contributions if necessary."</p>
PM10	Pages 37 and 38	<p><u>Paragraphs 11.14 and 11.15 and Policy NE2 – Biodiversity</u></p> <p>Paragraph 11.14 – amend second sentence of text to read:</p> <p>"In order to incorporate climate and biodiversity resilience, and to secure biodiversity enhancements in the Plan area, all proposed developments that are required to include Biodiversity Net Gain (BNG) as part of the proposals should deliver at least 10% BNG."</p> <p>Paragraph 11.14 – amend third sentence of text to read:</p> <p>"In 2020, the Surrey Nature Partnership recommended that Surrey's planning authorities should adopt a minimum 20% BNG requirement, but this presently exceeds national policy requirements."</p> <p>Paragraph 11.15 – delete fifth sentence of text.</p> <p><u>Policy NE2</u></p> <p>Amend first paragraph of policy text to read:</p> <p>"All proposed developments within the Plan area that are required to include Biodiversity Net Gain (BNG) as part of the proposals should deliver at least 10% BNG, in line with national requirements."</p> <p>Amend the first sentence of the second paragraph of policy text to read:</p> <p>"An appropriate buffer to protect statutory and non-statutory designated sites and habitats of principal importance should be included as part of development proposals, according to the specific circumstances identified through a full ecological assessment of the site and its surroundings."</p>

PM11	Page 39	<p><u>Policy NE3 – Trees, Hedgerows and Planting</u></p> <p>Delete the word “Neighbourhood” in the first paragraph of policy text and replace with “Plan”.</p> <p>Delete the second and third sentences of the second paragraph of policy text and replace with:</p> <p>“Development proposals should include a landscaping scheme, which identifies trees and hedgerows to be retained or removed as part of the development, with full details of replacement tree and hedgerow planting of appropriate species, preferably native species. Where necessary, planning applications should also include an arboricultural impact assessment.”</p>
PM12	Page 40	<p><u>Policy CF1 – Community Facilities</u></p> <p>Amend second paragraph of policy text to read as follows:</p> <p>“If it can be clearly demonstrated that the continued use of any of the above-listed facilities is no longer viable with evidence that the facility is no longer needed or that alternative facilities can be provided which are suitably located to serve the community, then other uses for the existing building or site will be considered.”</p> <p>Amend fourth paragraph of policy text to read as follows:</p> <p>“Proposals to improve the viability of an existing community facility, for example by the extension or partial redevelopment of buildings, structures and land, will be supported, provided that the design of the proposals and any increased use respects the village character, will not have a negative impact on the amenities of adjoining properties and where the requirements of other relevant policies in the Development Plan, including this Plan, are met.”</p>
PM13	Page 46	<p><u>Policy CF2 – Local Green Spaces</u></p>

		<p>First paragraph of policy text – delete the words “shown on the Policies Map Inset 1” and replace with “as defined on the Inset Maps at Annex B”.</p> <p>Delete second paragraph of policy text in full and replace with:</p> <p>“Development proposals in the designated Local Green Spaces listed above will be managed in accordance with national policy for Green Belts.”</p>
PM14	Page 43	<p><u>Policy ES1 – Supporting Local Employment</u></p> <p>Add new 4th bullet point to the first paragraph of policy text, as follows:</p> <ul style="list-style-type: none"> • “the proposals make adequate provision for car parking and bicycle spaces for employees and visitors, and” <p>Existing 4th bullet point to become 5th bullet point.</p>
PM15	Page 46	<p><u>Policy ES2 – Local Centre and Commercial Facilities</u></p> <p>Delete the word “accepted” in the first line of text in the first bullet point criterion and replace with “supported”.</p> <p>Delete the words “Design Codes” in the second line of text in the third bullet point criterion and replace with “Design Codes, particularly Design Code CO.14.”</p>
PM16	Page 49	<p><u>Policy I1 – Infrastructure for New Development</u></p> <p>Delete existing policy text in full and replace with:</p> <p>“In accordance with Policy SD5 in the adopted Runnymede Local Plan and the accompanying Infrastructure Delivery & Prioritisation SPD, the infrastructure requirements of development proposals within the Plan area will be assessed in terms of the impacts arising from the proposed new development upon existing community, transportation and environmental infrastructure.</p> <p>In order to deliver any new or improved infrastructure that is necessary to mitigate the impacts of new development in the Plan area, developer contributions will be sought by the</p>

		<p>Borough Council through planning obligations linked to planning permissions and through the adopted Community Infrastructure Levy (CIL).</p> <p>Local priorities for infrastructure improvements within the Plan area are identified in this Plan.”</p>
PM17	Page 51	<p><u>Policy TT1 – Car Parking</u></p> <p>Delete the words “Proposals for all new housing developments will” in the first line of policy text and replace with “Development proposals within the Plan area should”.</p>
PM18	Page 52	<p><u>Policy TT2 – Storage for Bicycles and Mobility Aids</u></p> <p>Amend title of policy to read: “Parking for Bicycles and Storage for Powered Mobility Equipment” and amend Contents Page accordingly.</p> <p>Delete existing policy text in full, and replace with the following text:</p> <p>“Proposals for new development in the Plan area, including the change of use of existing properties, should make provision for the parking of bicycles in accordance with Runnymede Borough Council’s relevant parking standards.</p> <p>Appropriate storage facilities and charging points should also be provided within new developments for powered mobility equipment, such as e-scooters, mobility scooters and powered wheelchairs, to meet the needs of residents, employees and other users of the proposed development.”</p>
PM19	Page 54	<p><u>Policy TT3 – Provision for pedestrians, cyclists and horse riders</u></p> <p>Amend title of policy to read: “Provision for Pedestrians, Cyclists and Horse Riders” and amend Contents Page accordingly.</p> <p>Delete existing policy text in full, and replace with the following text:</p> <p>“For proposed new developments within the Plan area that will require the submission of a Transport Assessment/Statement and/or a</p>

		<p>Travel Plan in order to assess the impacts of the development upon the highway and transport network in the surrounding area, any necessary mitigation measures should be identified to secure improvements for pedestrians, cyclists and horse riders. Such measures may include new or improved footpath and cycleway links, and improvements to bridleways.</p> <p>All such improvements should be designed in accordance with the policies and guidance of Surrey County Council as Highways Authority and should seek to reflect the character of the area and, where appropriate, the local heritage.”</p>
PM20	Page 56	<p><u>Policy RHUL1 – RHUL development proposals</u></p> <p>Amend policy title to read: “Royal Holloway University of London (RHUL)” and amend Contents Page accordingly.</p> <p>Delete first paragraph of policy text in full, and replace with:</p> <p>“Proposals for new development by RHUL will be supported where such proposals conform with the outline planning permission granted in April 2015 for the development of the RHUL campus and the accompanying Masterplan prepared as part of those planning proposals.”</p> <p>Add new second paragraph of policy text to read as follows:</p> <p>“Proposals which will promote sustainable development, by encouraging walking and cycling, reduced car usage, energy-efficient buildings and biodiversity enhancements will be encouraged.”</p> <p>Delete the word “must” in the second, third and fourth paragraphs of policy text, and replace with “should seek to”.</p> <p>Delete the words “Development must enhance or create” in the sixth paragraph of policy text and replace with “Proposals which will lead to”.</p>

		Add the words “will be encouraged” at the end of the sixth paragraph of policy text.
PM21	Page 58	<p><u>Section 17 – Aspirations, Implementation and Monitoring</u></p> <p>Add new paragraph 17.11 to read as follows:</p> <p>“17.11 A full review of the Plan will also be necessary should the emerging new Runnymede Local Plan, covering the period beyond 2030, be adopted by RBC during the next five years.”</p>