

RUNNYMEDE BOROUGH COUNCIL

RUNNYMEDE CLIMATE CHANGE ACTION PLAN

PUBLIC CONSULTATION STATEMENT

January 2024

Overview

- 1.1 The Climate Change Action Plan (CCAP) public consultation took place from Friday 1st December to Sunday 14th January 2024 – a period of around 6.5 weeks to account for the Christmas period. The CCAP was approved for public consultation by the Corporate Management Committee on 23 November 2023 – Minutes are available on the Council's website¹.
- 1.2 Dedicated CCAP public consultation webpages were created on the Climate Change section of the Council's website, describing the CCAP consultation documents, how to submit comments, the consultation event, and next steps. Hard copies of the consultation documents were made available for inspection at the Civic Centre offices, and at all libraries in the Borough. Responses were invited via a response form, or via email to the Climate Change team inbox. Written comments were also invited for those unable to submit comments electronically.
- 1.3 The CCAP consultation was promoted on the Council's social media channels including Facebook, LinkedIn and X (Twitter). The consultation was identified as a news item on the main Council website, and on the Climate Change news banner. Notifications were sent via email to 460 individuals and organisations on the climate change database; via residents' e-news (approximately 1,500 individuals); via the Business Runnymede newsletter; and via email to approximately 120 organisations including Residents' Associations, Neighbourhood Forums, local voluntary groups, the County Council and other statutory bodies and authorities. As a non-statutory plan, there was no statutory list of bodies and organisations that the Council was required to consult in its preparation. Despite this, all those mentioned in this paragraph have been included in this exercise.
- 1.4 The consultation was publicised on the Borough's noticeboards, and Council officers and members were encouraged to spread the word at any relevant community events. A consultation webinar took place on Thursday 4 January 2024 to explain the consultation documents in more detail. Reminders went out in the first week of January.
- 1.5 18 responses were received in total. 10 from individuals, 4 from local community groups, and 4 from statutory organisations. A summary of these and how they were taken into account can be found in Appendix A. One representation from Natural England arrived after the deadline, but they had no specific comments to make other than welcoming the inclusion of actions to deliver sustainable development in line with the Council's Local Plan.

Summary of Responses and Changes made to the Action Plan

- 2.1 A few key issues emerged from the public consultation as follows:
 - **Encouragement for the Council to support climate-related initiatives and local community action:** there was encouragement for the Council to support initiatives such as Incredible Edible and safer cycle training (including

¹ Runnymede Borough Council Corporate Management Committee Minutes, Thursday 23 November 2023, available at: <https://democracy.runnymede.gov.uk/documents/g950/Printed%20minutes%2023rd-Nov-2023%2019.30%20Corporate%20Management%20Committee.pdf?T=1>

for over 60s), as well as helping people and communities to own the broader sustainability agenda (bottom-up action). The importance of supporting behaviour change around waste reduction (ahead of recycling and reuse as per the waste hierarchy) and embracing circular economy principles was also emphasised, with various local initiatives identified that the Council could support.

- **Active travel and transport infrastructure improvements to improve air quality and reduce emissions:** there was strong support for actions which seek to improve local transport infrastructure, including active travel infrastructure such as extra bike racks at community centres, blue-green travel corridors and green spaces. Measures to address congestion and poor air quality should be given greater attention in the CCAP. Improving access to Heathrow and motorways (M25 and M3) needs careful consideration to reduce congestion at peak times, and thus make roads more attractive to active travel users and reduce emissions. Support for collaborative work with partners and stakeholders to deliver Active & Sustainable Travel actions, and encouragement to draw from Surrey County Council guidance and Local Transport Plan 4 in formulating revised Local Plan policies.
- **Flood risk management and the River Thames Scheme:** the response to flood risk should be given greater priority in the CCAP as this is a key concern for local communities. It was also emphasised that the River Thames Scheme poses a significant opportunity, not only for climate adaptation but also for local recreation.
- **Greater levels of ambition needed to achieve sustainable, net zero development and retrofitting of existing buildings:** support for actions to improve the energy performance of existing and new buildings, including Council-owned buildings, but stronger standards should be introduced and implemented more quickly.
- **Tree planting:** support for actions which result in tree planting, with emphasis on varieties to include fruit trees in community orchards to promote healthy eating, address food poverty, and reduce plastic waste. Funding should be identified to replace dead/dying trees in areas of the Borough, or those which have been removed due to new development. Once planted, maintenance of planting is paramount.
- **Lacks clarity on prioritisation of actions:** queries around how actions will be prioritised and how delivery will be monitored. Respondents generally recognised the financial and resource challenges that local authorities face and questioned whether the Council should focus on doing fewer actions well.
- **Introduce actions to encourage plant-based eating:** meat and dairy consumption was identified as a key source of emissions – the Action Plan should contain actions which limit meat-eating behaviour and increase plant-based eating behaviour.
- **Reinforcing support for bottom-up action with local communities, and collaboration with Surrey County Council and national statutory bodies to deliver actions:** reinforced the need for collaborative work to support the delivery of Surrey's Climate Change Adaptation and Resilience Strategy, and to support implementation of Historic England guidance on achieving a balance between climate change benefits and avoiding harm to the significance of heritage assets and settings.

- 2.2 Overall, respondents indicated that the development of a CCAP was a positive step towards achieving net zero objectives, and there was a collective emphasis on keeping up the momentum.
- 2.3 Several modifications have been made to the CCAP in response to issues raised, as described in Appendix A. Several of the points raised will be addressed by a variety of other means, such as through prioritisation of actions when annual Service Area Plans are prepared; and through emerging strategies as actions are implemented, for example, through preparation of the behaviour communications plan and revised Local Plan.
- 2.4 In addition, the revised version of the CCAP includes a number of modifications that have been made to the document drawing upon further feedback from senior officers at the Council now that the 2024/25 Service Area Plans have progressed and/or further information has become available. These include:
- Delivery and Monitoring section – revisions to the way priority actions will be identified and delivered i.e. through the Service Area Planning cycle (action 7.1.1 also amended to reflect this).
 - Removal of actions that are now complete – these have been summarised in an additional table at the end of the CCAP.
 - Action 1.1.1 – refresher training will be provided to existing Development Management officers as well as new officers.
 - Action 1.4.2 – amended to indicate that an EPC A rating for new council-led housing remains the ambition, but this will be subject to further assessment of viability and feasibility at the detailed design stage in recognition that relying on EPC ratings alone can have its limitations and offers an incomplete picture of a building's wider environmental impact.
 - Action 3.3 – minor amendments to reflect the fact that the EV Strategy has now been adopted, and action will focus on its implementation.
 - Action 5.3.4 – new action added to undertake an analysis of the management, maintenance and condition of the Borough's current meadow sites to understand possible future requirements and improve/enhance these sites.
 - Action 5.6 – action amended to reflect outcome of funding bid and that next steps are to be further developed.

Next Steps

- 3.1 The revised version of the CCAP was considered at the Climate Change Working Party meeting on Wednesday 24 January 2024. Following steer from the Working Party, on 22nd February 2024, Corporate Management Committee will be asked to recommend to Full Council that the Action Plan is adopted by the Council. The meeting of Full Council will take place on Thursday 29 February 2024, ahead of the 2024/25 financial year commencing.
- 3.2 The CCAP is a cross-service document that sets out shared responsibilities, with specific actions being owned by the relevant service area leads and implementation supported by other relevant service areas where necessary. The various actions identified in the CCAP therefore all have their own timescales for delivery. As described in the CCAP, detailed monitoring and climate change update reports will be prepared by officers of the Climate Change team and reported to the Corporate Management Committee at regular intervals.

Appendix A - Summary of Representations for the draft Runnymede Climate Change Action Plan Public Consultation and the Council's Response

Name	Summary of Response	Comment	Amend CCAP?
Private individual	<p>Runnymede Borough Council (RBC) should develop a Circular Economy Strategy and Roadmap similar to Brighton & Hove, with benchmark targets and dates. A Circular Economy Statement as mentioned in the CCAP can be a first step, but a roadmap needs to follow. This should be developed in conjunction with Royal Holloway University of London (RHUL) – suggests there is more they could do to minimise resource use and wastage. Can also offer academic research and expertise.</p> <p>Supports the action to develop the quality of school transport plans. Only a minority of Surrey schools have one. Around a quarter of peak time traffic in Surrey is generated by school runs. Many school transport plans lack ongoing support and need updating.</p>	<p>Action 4.2 will see the implementation of the Surrey Environmental Partnership (SEP) 2025 delivery plan, a priority of which is to support the principles of a circular economy. The SEP, which includes RBC, will apply the delivery plan and seek to maximise opportunities to keep products in use for as long as possible through sharing, reuse, repair and refurbishment. This is an area the SEP will provide focus and priority to by developing a reuse strategy for Surrey. In the meantime, comments about the development of a borough-specific Circular Economy Strategy are noted and will be given further consideration for future iterations of the CCAP.</p> <p>Action 4.6 seeks to collaborate with partners to facilitate behaviour change in Runnymede to adopt more sustainable and resilient waste practices – this could include both local community groups, schools, colleges and the RHUL. A key objective of the Council's Economic Development Strategy is to develop the low carbon circular economy in Runnymede, which will involve collaboration with a range of stakeholders, including local businesses and RHUL. RHUL is a member of RBC's Business Runnymede Steering Group.</p> <p>Action 3.9.2 seeks to work with local schools to improve the quality of School Travel Plans. Comments will be taken into account in the implementation of this action, particularly</p>	No.

		around the longer-term effectiveness, monitoring and revision of Travel Plans.	
Private individual	<p>Is aware that funding for local authorities is challenging but the CCAP should be more ambitious and be amended to address some key challenges, particularly level of exhaust emissions in the area. Runnymede's bottlenecks cause traffic gridlock at peak times, leading to poor air quality, which needs greater attention in the CCAP. RBC should consider small but incremental interventions at each bottleneck – minor changes to road layouts, traffic light changes, prioritising active travel, level crossing changes. Lobby Network Rail to change their signalling system e.g. in Addlestone. Surprised at no mention of motorways - the CCAP should include actions referring to improving the motorway network and junctions, as this infrastructure must have a big impact on emissions.</p> <p>Does not support the concept of a Heathrow rail link – a coach service would be a better option, particularly if using greener fuels. This would offer regular journeys, low carbon, affordability and a lot more flexibility than fixed rail. RBC should take independent advice on this.</p> <p>Once the River Thames Scheme is delivered, local people must have access to it and use it for leisure purposes. It should become a resource all can enjoy e.g. watersports (not powered boats), walking, birdwatching, fishing etc.</p>	<p>RBC are very much aware of the prevalence of car use in the Borough and subsequent impact on air quality, increased congestion and pressure on the road network and public transport systems. The Council's Economic Development Strategy identifies this as a potential threat to sustainable economic growth. The Strategy recognises that to encourage a greater modal shift to sustainable transport options, significant improvements to the rail, bus and cycle facilities and services will be required, in addition to ongoing road improvement works. There are several actions in the CCAP which seek to improve outcomes through new development; and to work with Surrey County Council (SCC) and other stakeholders including Network Rail and National Highways to identify and deliver improvements, and critically, to identify the necessary funding streams. We continue to work with Network Rail to explore opportunities to improve signalling and rail capacity. National Highways have responded to the consultation (see below), welcoming a focus on collaborative work and ongoing discussion, and signposting their support for policies which may off-set strategic car journeys that could otherwise travel on the strategic road network. Minor amendments can be made to the CCAP to improve clarity on these points.</p> <p>RBC is a member of the Heathrow Strategic Planning Group, working with partners to improve surface access to Heathrow (as per action 3.8.2). Comments are noted about the preference for coach over rail services, and</p>	<p>Yes – amend action 3.6.9 to specifically identify signalling improvements as an issue to continue to explore with Network Rail and SCC.</p> <p>Amend action 3.7 to make it clear that RBC will continue to work collaboratively with bodies including National Highways to lobby for investment in strategic road network schemes to ease congestion in the Borough to facilitate safe active travel and sustainable transport connectivity.</p>

		<p>this will continue to be explored in delivering and updating the transport strategy for Heathrow, which includes objectives to improve bus/coach permeability into the airport from all directions (especially the south) and to strengthen coach infrastructure.</p> <p>Comments about the River Thames Scheme are noted. Many co-benefits will be achieved alongside flood relief, including leisure opportunities. RBC contributes to all consultation activities to identify local priorities, and this will continue as per action 5.5.</p>	
Private individual	<p>A good start, but lacks prioritisation of actions. Sustainability should be embedded into procurement and culture of the Council to support climate change objectives and ensure delivery. See Sustainable procurement – delivering local economic, social and environmental priorities Local Government Association for more information. Transparency of supply chains is mentioned, but in practice is difficult to achieve. RBC should be aware of abuses and exploitation in this area. Consider running the East of England LGA diagnostic which may give RBC more clarity: https://www.eelga.gov.uk/responsible-procurement-diagnostic/.</p> <p>Think bottom-up, not top-down – help people / communities own the broader sustainability agenda.</p> <p>Understand RBC's sphere of influence – concentrate on doing a few things well.</p>	<p>Actions will be prioritised annually through the preparation of Service Area Plans (SAPs). As part of the annual SAP cycle, officers will work with elected members and service areas to determine priority actions. Where possible, officers will continue to work post-adoption of this CCAP to identify costs and carbon savings associated with the actions to help with prioritisation of actions. A new action has been added to this effect.</p> <p>RBC is aware that embedding sustainability into procurement can support the wider climate change objectives of the Council and achieve many sustainability benefits. Action 7.4 and its sub-actions focus on the implementation of the Council's new Sustainable Procurement Policy, and monitoring its effectiveness. The LGA's Sustainable Procurement toolkit has been used in the preparing this policy. Staff will be trained on the implementation of the policy, and in addition, senior RBC officers will be offered carbon literacy training (action 7.3.1) – this will help staff understand potential for</p>	<p>Yes. New sub-action 7.1.5 added to work towards cost and carbon impact modelling the actions set out in the Action Plan (and others as they are developed).</p>

		<p>exploitation and abuse of the policy by suppliers.</p> <p>RBC agrees that there is huge potential to work with local communities on bottom-up initiatives, many of which are already being implemented and which RBC seeks to support. There are several actions in the CCAP which promote partnership working with local communities to influence wider behaviour change across the Borough.</p>	
Private individual	Not detailed / specific / tangible enough. A number of actions need to be identified by the Council and possibly added to if any contributors have anything further to add, or any original ideas.	Comments noted. Officers have drafted the CCAP with input from colleagues across all service areas, and many other contributors, to identify actions and ensure they are specific, realistic and deliverable. The introductory chapters of the CCAP set out how these actions will be monitored and reported on.	No.
Private individual	A good plan in principle but lacks effective action. For example, removed trees are not being replaced by adequate replacement specimens due to a lack of funding. If large, older trees are removed, they should be replaced with large, prosperous, area-appropriate ones, rather than just saplings. Dead and dying trees in the area also won't be replaced. Trees are also being removed to make way for new development and if replaced, they are not well established or properly maintained by RBC or developers. New trees should be planted where they are needed, such as Chertsey.	<p>To reinforce existing Local Plan policies which seek to protect valuable trees, the Government is introducing 'Biodiversity Net Gain' requirements which makes sure new development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before. This is expected to lead to a measurable enhancement of biodiversity on-site and a concerted effort to avoid loss of biodiversity habitat, such as trees, when developing a site. Action 5.1 of the CCAP seeks to review and strengthen Local Plan policies which enhance green infrastructure and bring about net gains in biodiversity, but these new, national BNG requirements will apply to new development proposals before the adoption of a revised Local Plan.</p> <p>In addition, action 5.3 will see the implementation of RBC's sustainable planting</p>	No.

		<p>policy, an element of which is to spend existing Treescapes funding and identify new sources of funding to continue to plant trees and hedges in areas of the Borough that need improved coverage. The Climate Change Strategy and CCAP recognises that trees have a valuable role to play in carbon sequestration and RBC will pursue opportunities to increase tree cover in the Borough – this is reflected in various actions in the CCAP, particularly under the Natural Environment & Biodiversity Actions theme.</p>	
Private individual	<p>Actions should be included which promote plant-based eating over meat and dairy consumption, which cause up to 30% of the world's carbon emissions (including transport of food). Changing what people eat is much cheaper for RBC to impact, has health benefits, and has large impacts to help the environment. Work with schools, the local hospital, and Council-operated buildings to limit meat options and increase plant options.</p>	<p>RBC is aware of the behavioural changes required in order to reduce emissions generated by meat and dairy production, and has included action 8.2 to work with partners and communities to encourage behavioural change, supported by annual communication plans. There is scope for communications campaigns to promote the benefits of plant-based consumption and signpost relevant schemes (action 8.2.1). Action 7.7.1 will see RBC consider the sourcing and ingredients of Meals on Wheels and day centre meal services, and challenge providers to meet environmental objectives.</p> <p>However, in addition to this, the CCAP can be revised to include new sub-actions under action 5.7 to raise awareness of relevant campaigns and support the delivery of Healthy Surrey's emerging Food Strategy, which will contain actions to respond to food-related emissions.</p>	<p>Yes - amend action 5.7 to make it clear that RBC will work with partners such as the Surrey Food Partnership, community groups and not-for-profit organisations to develop an environmentally sustainable local food system.</p> <p>Add new sub-action 5.7.4 to raise awareness of relevant campaigns with residents, local businesses, and organisations about the benefits of healthy, plant-based diets.</p> <p>Add new sub-action 5.7.5 to support the</p>

			delivery of the Surrey Food Partnership's emerging Food Strategy, which recognises that food systems represent a significant source of total greenhouse gas emissions.
Private individual	Assist residents to improve their cycling skills, including over 60s. There is no safe space to practice. The Borough needs an area where people can practice cycling away from pedestrians and cars; and more cycling lanes so people can cycle to their destination without having to use roads. This can improve fitness and reduce emissions.	Comments are noted and will be considered further in the delivery of CCAP actions. The Active & Sustainable Travel theme includes several actions which seek to improve active travel infrastructure, including through the delivery of the Runnymede Local Cycling and Walking Infrastructure Plan which identifies specific routes for improvement. Actions will also see RBC working with SCC to implement the Local Street Improvements programme to improve pedestrian and cycling infrastructure, and to ensure the Bus Improvement Plan represents local priorities to encourage people out of cars, reduce traffic on the roads, and subsequently improve safety for cycling. Action 3.9.1 will see RBC promote cycle training for children, families and residents, which can extend to all those in need, including over 60s. The health and wellbeing benefits of this are recognised in the Council's Health and Wellbeing Strategy.	No.
Private individual	Although the CCAP says that estimates of carbon impacts and cost implications are provided where available, and that the Action Plan is informed by baseline data, 75% of the actions and 84% of the sub-actions are shown as having an unknown impact. How will RBC estimate what these unknown impacts might be in order to establish which of them offer the greatest value for money in terms of carbon reduction per pound spent? Currently, the only	At this stage, the carbon impact and cost implications of delivering the actions contained within the CCAP have not been fully quantified, and this is acknowledged in the introductory chapters. The majority of actions have not been progressed sufficiently to be able to quantify potential carbon savings and cost implications. However RBC does not	Yes. New sub-action 7.1.5 added to work towards cost and carbon impact modelling the actions set out in the CCAP (and others

	<p>action with a high or very high impact and low cost is the Energy Strategy for the Council's operational estate, and that is subject to budget.</p>	<p>want this to delay publication of its plan of action for tackling the climate emergency. Impact modelling is complex, costly, and can only ever result in best estimates based on the input assumptions. However, quantifying the carbon impacts and detailed financial costs of the actions can itself be made a key action of the CCAP. This work tends to go hand-in-hand with developing projects, and in supporting bids for external sources of funding – a necessary step in delivering many of the actions in the CCAP, particularly those which seek to decarbonise Council operations.</p> <p>In the meantime, RBC will continue to rely on its understanding of emissions sources in the Borough, the work of others including the Climate Change Committee, other local authorities and interested parties to develop an informed judgement of the type of actions that will have a major impact on RBC's ability to meet its targets of net zero and climate resilience. Many of these actions are obvious and so called 'least-regret' because there is no doubt that they will help and/or would result in more desirable co-benefit outcomes in relation to health and wellbeing, biodiversity, the local economy, society or education and skills of the population.</p>	<p>as they are developed).</p>
<p>Private individual</p>	<p>Questions whether the CCAP is ambitious enough. Other countries are much further ahead with e.g. energy insulation standards in homes and buildings; disposal and recycling of waste and construction materials, to name a few. The CCAP consultation period has coincided with Christmas and several other public consultations e.g. Virginia Water Neighbourhood plan and Whitehall Farm. More responses may have been received given sufficient time.</p>	<p>RBC recognises that there is much progress to be made. The CCAP contains realistic, deliverable actions given the financial and resource challenges that the Council, similar to many other local authorities, is facing. The consultation period was extended to 6.5 weeks to give people more time to respond – a longer time period would have meant that the CCAP may not have got adopted before the start of the new financial year. It is</p>	<p>No.</p>

	<p>Under Greener Homes & Buildings, RBC should insist that builders meet BREEAM standards and LEED targets depending on the type of development, rather than encourage. Local Plan Review policies need to be a lot more ambitious with costs allocated to builders. New homes should be carbon neutral without increasing the cost of homes.</p> <p>Retrofitting and improving energy efficiency and heating systems in existing Council housing stock will be important, but questions whether there is the budget to fund this. Paramount that new Council-owned homes have a high energy performance rating, use solar panels and underground energy sources to heat the properties, bringing them off the grid. No houses should be built on potential flood zones. Decarbonising the operational estate is also very important – do this as soon as possible.</p> <p>Under Energy Generation & Storage, how will Local Plan policies be revised to support new stand-alone renewable and low carbon energy development? Queries whether RBC has selected a solar panel company which provides residents with best value – who oversees this process? Community-led renewable energy projects have much potential, but there are few volunteers to deliver this action.</p> <p>Under Active & Sustainable Travel, support actions for new and redevelopment to support improvement and expansion of active travel and sustainable transport infrastructure. Climate change planning policies should be developed drawing on joined-up thinking by departments, and with greater emphasis on cycling/walking networks which do not appear to be a priority e.g. the cycle/walking path stops as you exit Longcross and enter Virginia Water. The planning application for 140 houses in South Virginia Water must therefore include land to allow the path to continue</p>	<p>important to adopt it ahead of the new financial year in order to drive project delivery.</p> <p>RBC can only introduce stronger homes and buildings standards for new development (such as BREEAM standards) through the plan-making process, once it has been demonstrated at an independent examination that such standards will not threaten the supply or affordability of homes. RBC will be exploring all policy options as part of the Local Plan Review process, and the CCAP therefore contains various actions to deliver sustainable development through the existing Runnymede 2030 Local Plan, and newly adopted Design Codes and planning guidance as an interim measure. These documents can only encourage developers to go beyond existing Local Plan standards, rather than insisting on this. The Climate Change Study has been published to support the Local Plan Review and identifies a number of policy options – this evidence will inform the development of RBC’s revised planning policies, alongside the findings of a viability assessment. The Study is available on the Local Plan Review website at: 2030 Local Plan Review Evidence Base documents – Runnymede Borough Council. The Study also identifies policy options to better support standalone renewable and low-carbon energy development.</p> <p>The availability and identification of funding for actions is explained in the introductory chapters of the CCAP. RBC will proactively identify and bid for relevant sources of funding to aid delivery. Actions in the CCAP set out the standards which RBC will seek to achieve for new Council-owned housing – energy</p>	
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	<p>towards Virginia Water. We need to be more ambitious with our partnership working with SCC – questions who is involved in the Joint Infrastructure Group. The draft Virginia Water Neighbourhood Plan would like to see more safe cycling / walking routes. In discussions with TfSE we need to emphasise the need for better bus infrastructure and consult residents on the routes they would like to see e.g. linked to schools / train stations.</p> <p>Action plans to mitigate air pollution contain targets which are currently totally inadequate. This is causing huge concern for residents of Virginia Water. Most of the postcodes fall outside the acceptable limit for air pollution.</p> <p>Under Reducing Borough-wide Waste, wording should be strengthened e.g. from ‘recommend’ to ‘adhere’. Any waste and resources strategy should ensure all residents have food bins for recycling by 2025. Waste recycling facilities should be improved in social housing, especially in flats. Improve re-use infrastructure and provide spaces for re-use of clothes (Talking Tree café in Staines is an example). Look for opportunities to use empty high street premises to create community and ‘circular economy’ projects / create a recycling, repair and reuse culture amongst residents.</p> <p>Under Natural Environment & Biodiversity, joined up thinking is needed between RBC and SCC departments such as those in charge of climate change and biodiversity and those in planning. Planning applications should carefully consider the implications for water drainage. Destruction of the natural world must be chased up and enforced to protect designated habitats. Protect wildlife and diversity at Whitehall Farm, where gravel extraction will destroy the natural environment of numerous species e.g. protected bats. Lobby government to ensure that there are no leakages / sewage into our waterways. Action 5.7.1 – Whitehall Farm could be used for local food production instead of gavel extraction.</p>	<p>solutions to meet high performance standards will need to be assessed further for viability and feasibility at detailed design stage. Any proposals will be assessed against the flood management policies in the Runnymede 2030 Local Plan.</p> <p>RBC follows its Procurement Strategy 2023 to 2026 and procurement policies when contracting third parties and awarding contracts for goods, works or services. There are specific rules and governance procedures that must be followed, including rules around contributing to social value. The documents can be read in detail at: Purchasing and procurement – Runnymede Borough Council.</p> <p>The comments relating to active travel and sustainable transport infrastructure are noted. During the plan-making process policies are developed using the input of many stakeholders, including officers from SCC and from other RBC service areas. Due to various challenges, cycling / walking infrastructure projects must be prioritised according to affordability, deliverability and level of community support (as explained in Surrey County Council's Infrastructure Plan), but RBC continues to work with SCC and developers to deliver improvements across the Borough on non-priority routes. SCC will continue to engage with local communities about improvements to bus services as part of the Bus Service Improvement Plan for Surrey and Local Transport Plan 4. The Joint Infrastructure Group is attended by a range of RBC officers from the planning department (and other departments as appropriate according to the agenda) and SCC officers</p>	
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	<p>Supportive of actions under Green Economy, but queries how the actions will be enforced e.g. any new applications for businesses need to ensure businesses install a charging point for their employees and/or customers. Charging points will need to be installed in all areas of vehicle movement so that people can be confident that it is worth investing in an electric vehicle.</p> <p>Supportive of actions under Sustainable Council, but queries whether RBC has the resources to implement them and queries who will monitor the delivery of projects, within this theme and all others.</p> <p>Actions under Supporting our Communities are relying heavily on identifying community groups to help achieve objectives. Queries how these groups will be identified and how will engagement work. There are many that RBC needs to identify and contact.</p>	<p>from the Infrastructure Planning & Major Projects team, and other teams as appropriate. This facilitates ongoing joint working to deliver active travel and transport infrastructure in Runnymede.</p> <p>The comments regarding air pollution and targets are noted and will be considered when delivering action 3.5 which sets out how RBC will review and assess the air quality of the Borough.</p> <p>The words using the actions under Reducing Borough-wide Waste are considered to be clear and ambitious, and most of the suggestions are addressed by existing actions in the CCAP. For example, action 4.4.1 seeks to increase food waste capacity in Council-owned homes, and action 4.6 will see RBC engage and collaborate with partners to build a 'reduce, re-use and repair' culture, and consider whether Council-owned shop units can be used to accommodate community groups. Whilst sewage discharge is not addressed in the CCAP, RBC recognises that this is an important local issue, and continues to work with Thames Water and to develop its Drainage and Wastewater Management Plan.</p> <p>Officers in the planning department at RBC – both in the Development Management and Planning Policy teams – work with officers at SCC on policy formulation and on implementing 2030 Local Plan sustainable transport and flood management policy requirements when deciding planning applications. As Lead Local Flood Authority, SCC is consulted on flooding issues and water drainage for both plan-preparation and in</p>	
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		<p>planning application decision-making. The Local Plan Review CCAP actions will see RBC working with SCC and drawing on their advice. Their advice is also used to improve the implementation of existing 2030 Local Plan policies. SCC is the determining authority for the Whitehall Farm application as this is a County matter, but RBC has submitted a consultation response setting out the Council's concerns and signalling the concerns and issues raised by local residents.</p> <p>Support for actions is noted. Officers in the Climate Change Team have worked closely with officers across all service areas of the Council to ensure the actions are realistic and deliverable. Some of the actions will need further investigation and detailed assessment of costs, feasibility, and resources will be required. The introductory chapters of the CCAP explain this in more detail, and describe how actions will be resourced, funded and monitored over time and by whom. The same principles apply to actions presented under the Green Economy theme.</p> <p>RBC agrees that electric charging point infrastructure needs to be improved – action 3.3 will see the implementation of the Council's recently adopted EV Strategy, which considers in more detail how charging infrastructure can be improved.</p> <p>In accordance with action 8.2, officers are currently producing a communications plan which considers how best to identify and contact local community groups and individuals who would like to work with RBC on delivering various actions. Many</p>	
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		communication methods will be used to invite groups and individuals to contact RBC if there is an interest in contributing to this work.	
Private individual	<p>Under Greener Homes and Buildings, energy efficient housing can be modelled using Passivhaus + and Passivhaus Premium. Permaculture can be used to improve biodiversity in new housing.</p> <p>Concern that electric vehicles (EVs) are not as green as they are made out to be. The energy to power an EV is still from a coal-fired power station. Whilst there are benefits, there are also several drawbacks of EVs, including the carbon cost of producing a car; the polluting tyres; and issues around recycling car batteries when they can no longer be recharged. There is a danger that people will simply fly-tip batteries which contain toxic heavy metals.</p> <p>The actions on active travel are important for health and wellbeing. Developing a way to travel safely by cycling and walking is important. It will reduce the amount of attendance at GP surgeries and hospitals, and mean social prescribing becomes easier with active travel infrastructure in place.</p> <p>Suggest action 3.9 includes reference to introducing and promoting bicycle days at Great Big Green Week. Consider having a no-car day on Sunday, meaning certain areas don't have cars for a certain period of time – perhaps all the towns within the Borough.</p> <p>Improve capacity to store bicycles safely – there are too many bicycle thefts.</p> <p>The Waste section needs to be expanded on with more emphasis and focus on the reduction of waste, rather than what to do with the waste generated. Carbon emissions arise from the manufacture of products and the transportation of products to the death and disposal of</p>	<p>Comments are useful and noted. The Climate Change Study will underpin the development of revised Local Plan policies, as well as consultation on the policy options. The Study has identified a number of regimes which could drive up standards in a revised Local Plan, including Passivhaus, and these policy options will be explored in detail during the plan-making process. The Study is available on the Local Plan Review website at: 2030 Local Plan Review Evidence Base documents – Runnymede Borough Council.</p> <p>A key driver for supporting the rollout of EV infrastructure is the national, regional and county-wide legislative and policy landscape. Given this wider context, RBC has developed an EV Strategy to create a supportive policy environment; enable the creation of new charging facilities for EVs; promote their benefits to a wider audience; and work with partners and private enterprises to encourage wider take-up. It is recognised that a transition to EVs must happen alongside growth in all other zero emission and low emission forms of travel, such as walking and cycling – the action to develop an EV Strategy is complemented by many actions to support active travel and public transport infrastructure. However, where car and van journeys remain the preferred mode of transport, the EV Strategy aims to ensure a far higher proportion of these vehicles using highways across the Borough are producing less harmful emissions than those vehicles powered by petrol and diesel fuels. Further</p>	<p>Yes. Amend action 4.6.1 to expand the 3Rs from recycling, repair and reuse to 'rethink, refuse, reduce, reuse, refurbish, repair, repurpose and recycle'.</p> <p>Amend action 4.6.2 to indicate that local events should aim to reduce waste in the first instance, ahead of considering recycling of waste generated.</p> <p>Amend action 4.6.4 to refer to community fridges as a scheme which could be shared with residents.</p> <p>Introduce new action 8.2.3 to explore opportunities to support partners deliver carbon literacy training to a wider audience.</p>

	<p>products. When looking at the circular economy, recycling needs to be the very last of the 'R's. There is too much emphasis to educate householders to 'recycle'. According to Surrey County Council data, Runnymede Borough Council household recycling rates are poor. RBC is at the bottom of the scale in terms of proportion of waste recycled. Landfill has increased. This indicates that the waste should have been incinerated, but incineration produces greater carbon emissions. Neither situation is good. Recycling is very energy intensive – it requires collection, sorting, and sending to another location and then to be processed. Much household waste is packaging. It is important to move responsibility to manufacturers. Drawing on case studies, the Council can endorse a deposit return scheme on single-use bottles, cans, vapes, cigarette boxes, and take-away boxes. Items can be returned to shops in exchange for funds. RBC should celebrate the International Day of Zero Waste. Expand the 3 'Rs' to Rethink, Refuse, Reduce, Reuse, Refurbish, Repair, Repurpose, Recycle.</p> <p>To improve household recycling, provide separate bins for different items. The waste management teams will instantly see offending items and can use this to educate the offending household.</p> <p>Household food waste should be minimised by educating people about community fridges and understanding about storage of produce, as well as learning how to budget and how to cook. Much more education is needed.</p> <p>Actions under Green Spaces need to be expanded to promote Blue Hearts and explore the prospects of delivering biodiversity through food forests. Also when trees and hedges are planted, think about food that can be foraged from these plants by society. This encourages people to be active, by gathering food.</p>	<p>details can be found in the adopted EV Strategy, available at: Electric Vehicle Strategy – Runnymede Borough Council.</p> <p>Comments regarding active travel actions are noted. Comments about promoting cycling during Great Big Green Week are noted, and will be considered as part of delivering action 8.2.</p> <p>Existing Local Plan policy requirements support proposals which provide secure cycle storage, and these are implemented effectively. Surrey's updated Local Transport Plan 4 aims to support cycle facilities, for example secure cycle parking. Action 3.6 seeks to work with SCC to improve cycling infrastructure in line with priorities set out in the Local Transport Plan, including through the Local Street Improvement programme.</p> <p>Comments regarding waste reduction and recycling are noted. Several actions are included in the CCAP which focus on working with local communities to adopt more sustainable and resilient waste practices, and RBC understands that actions to reduce waste should be prioritised over actions to improve recycling, in accordance with the waste hierarchy. Amendments can be made to the actions which expand the 3Rs as suggested (action 4.6.1) and which prioritise waste reduction over improving recycling (action 4.6.2). As part of actions 4.6 and 8.2, RBC will share information about new schemes and initiatives with residents which incentivise waste reduction. This could potentially include some sort of deposit return scheme, and</p>	
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	<p>The implementation of a blue-green highway for active travel would be welcomed by the active travel community.</p> <p>Reward companies that actively reduce waste and carbon emissions. An example is the low carbon zero waste pizza company in Germany. Encourage innovative thinking via the business network meetings.</p> <p>Under Green Economy action 6.7, encourage businesses to engage more in active travel, public transport days and reduction of car trips. Under action 6.9.1, digital solutions are not the solution – a smart electric meter does not reduce energy consumption of a cooker or heating system that is installed in a home. Education is important – understanding how to dress for colder weather, reduce condensation, maintain a home, cook efficiently – how an individual can adjust to a changing environment.</p> <p>Webinar feedback: lend greater support to deliver carbon literacy training to a wider audience.</p>	<p>awareness-raising around the International Day of Zero Waste.</p> <p>The extent of influence that RBC has in changing manufacturing practices and minimising food packaging is limited, but RBC will use its influence to raise awareness of the issues raised in the representation and help educate local communities to change behaviours (actions 4.6 and 8.2). An amendment can be made to action 4.6.4 to identify community fridges as schemes that should be publicised, as well as any other relevant schemes.</p> <p>The comment about a blue-green active travel highway is noted and will be explored through consultation with partners on the River Thames Scheme, as per action 5.5.</p> <p>The Greener Economy actions describe how RBC will work with local businesses and organisations to encourage behaviours that result in reduced emissions. Comments about actions 6.7 and 6.9.1 are noted and will be considered further in the delivery of these actions.</p> <p>An action has been added to the CCAP to assist with wider dissemination of carbon literacy training (8.2.3) as discussed at the webinar.</p>	
Local community group	<p>Welcomes the CCAP and that actions have been identified based on estimates of carbon impacts and costs. Pleased that the CCAP focuses on carbon emission reductions as the primary goal, and mitigation – sceptical about offsetting, which simply transfers responsibility to someone else or somewhere else.</p>	<p>Comments about offsetting are noted and supported. Carbon offsetting will always be considered as a last resort after other measures to reduce or avoid emissions have been explored.</p>	No.

	<p>Concerned about lack of ambition regarding the 2030 Local Plan, which should be considered as the status-quo and completely insufficient for the necessary further deep reductions in carbon emissions. Concerned that the Action Plan does not recognise the crucial importance of the Local Plan Review and concerned that the Review is currently on ice.</p> <p>Particular lack of ambition in actions for Delivering Sustainable Development – omit any strong commitment to energy-efficiency in new developments e.g. in “actions to ensure new development meets and where possible exceeds energy requirements in the existing Local Plan”. RBC should go further than this. The actions which will result in stronger climate change planning in a future revised Local Plan are largely unspecified, and so are effectively kicking the can down the road.</p> <p>Question the Council’s engagement with Heathrow’s Strategic Planning Group and its objective to jointly shape the proposed expansion of Heathrow airport. Oppose action 3.8 to work with the Group to influence airport plans for growth. Opposed to Heathrow expansion as air-travel is such a large contributor to carbon emissions. There is no place in a CCAP for plans to achieve expansion of flights to/from Heathrow – the CCAP should oppose future expansion of the airport.</p> <p>Appreciates that the CCAP is a “framework for everyone to take action to reduce emissions and adapt to the climate change that is already occurring”. Approve the intention to review and update the Plan as new information, new ideas and new solutions become available. The group looks forward to contributing to future consultations and reviews.</p>	<p>Actions 1.1 and 3.1 concentrate on effective implementation of the existing Runnymede 2030 Local Plan in recognition of the fact that it can take several years to prepare and adopt a revised Local Plan, and that there are actions RBC can take in the meantime to encourage the delivery of low carbon, energy efficient buildings using existing policy requirements, and by publishing new guidance which encourages developers to exceed these requirements wherever possible – such as through adoption of the Net Zero Carbon Toolkit (action 1.1.4). National Planning Practice Guidance makes it clear that RBC cannot set policy requirements in any supplementary planning guidance ahead of a Local Plan Review. Any stronger net zero standards for new development can only be consulted upon, assessed for viability and examined as part of the statutory plan-making process. It is important that a robust viability assessment demonstrates that any new net zero standards will not jeopardise the supply and affordability of housing.</p> <p>RBC recognises the importance of the Local Plan Review in strengthening climate change planning policy. Work on this will resume once the new plan-making regime is introduced and there is more certainty from the government on the procedures RBC needs to follow to prepare a revised Plan. The CCAP cannot go further and contain more ambitious standards for delivering sustainable development at this stage as the policy options need to be informed by evidence and then consulted on widely, as per planning legislation. This will all take place as part of the Local Plan Review. Notwithstanding the pause to the review, RBC</p>	
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		<p>has recently published a Climate Change Study which identifies the policy options that can be pursued as part of the plan-making process once it resumes. This is available on the Local Plan Review website at: 2030 Local Plan Review Evidence Base documents – Runnymede Borough Council.</p> <p>It is not for the CCAP to set out the Council's position on airport expansion. The Council's position on previous expansion proposals can be viewed as part of the Corporate Management Committee meeting minutes available here: Minutes-22-March-2018-Corporate-Management-Committee (runnymede.gov.uk). Actions 3.8, and sub-actions 3.8.1 and 3.8.2, seek ongoing representation from RBC on the Heathrow Strategic Planning Group to ensure RBC's interests and concerns are conveyed at meetings and to help ensure the airport's future plans are sustainable. A key concern is the increased traffic and therefore emissions that Heathrow generates in Runnymede. With transport representing a significant source of carbon emissions, the actions set out how RBC will continue to attend the Planning Group meetings to influence outcomes and help achieve a modal shift to public transport away from private car use.</p>	
Local community group	<p>Provide secure bike racks at Great Park gates and community centres such as the hub, Englefield Green.</p> <p>Support for actions which enable local food growing. Growing local food reduces food transport carbon emissions, plastic waste, builds community cohesion, addresses food poverty and promotes healthy active lifestyles. RBC should support Incredible Edible's 'Right To Grow Campaign', offering to support local food growing</p>	<p>Actions 3.1 and 3.2 refer to implementing existing and strengthening future planning policies which improve active travel and sustainable transport infrastructure through new and redevelopment proposals. Once the Englefield Green Village Neighbourhood Plan is formally adopted, the Englefield Green Village Neighbourhood Area will generate increased Community Infrastructure Levy</p>	<p>Yes. New sub-action 5.7.2 to identify demand for additional allotment sites and explore options to increase allotment capacity if required.</p>

	<p>groups and Local Authorities to utilise council land that is not currently being used for another purpose. Small community gardening groups are growing in parks and community centre car parks e.g. Hythe Park Community Orchard and The Hub, Englefield Green. This enables people to grow food close to home, increasing a sense of engagement and responsibility for maintenance. Measures which enable water capture through water butts mean that gardeners and community groups can use rainwater rather than mains water.</p> <p>Tree planting should consider including a variety of trees, including some fruit trees in community orchards, and if necessary for safe access, dwarf fruit trees and bushes. This will help promote healthy eating and reduce food poverty and reduce plastic packaging from supermarket bought fruit.</p>	<p>funds. Projects such as bike racks would be the type of local infrastructure that neighbourhood CIL funds could be spent on, should the local community support this. Action 3.6.10 seeks to ensure active and sustainable travel projects are considered for CIL funding. RBC will also raise the issue of bike racks and other cycling infrastructure improvement measures with SCC in discussions with them about Local Street Improvements (action 3.6.5).</p> <p>Action 4.1 seeks to review and strengthen Local Plan policies which aim to reduce waste and promote sustainable use of resources. Opportunities to increase local food growing and incorporate measures into new development that improves rainwater harvesting will be considered as part of the Local Plan Review as per action 5.1.3. Action 4.6.6 seeks to work with residents and the community to encourage and promote home and community composting. Support for these actions is noted.</p> <p>The Green and Blue Infrastructure (GBI) Strategy – being developed under action 5.2 – will identify opportunities to improve green spaces and increase tree cover across the Borough, and community orchards could be a way of achieving this. Action 5.2.3 will see RBC consider the availability of Council-owned land to act as a habitat bank which can contribute to carbon sequestration.</p> <p>Comments regarding support for the Right to Grow campaign and identifying land for food growing are noted. Actions have been added to the CCAP to address these comments.</p>	<p>New sub-action 5.7.3 to consider supporting the Right to Grow campaign.</p>
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Local community group	Supports the Virginia Water Neighbourhood Plan Forum on the development of the Neighbourhood Plan, and their Regulation 14 pre-submission document, which contains material on Greener Homes and Buildings, Active & Sustainable Travel, Natural Environment & Biodiversity.	RBC is supporting the Forum on the development of the Neighbourhood Plan, and is aware of the draft policies referenced in the consultation response. RBC will be responding separately to the Forum's Regulation 14 consultation in due course. A key consideration will be whether the proposed policy requirements have any impact on housing supply and affordability.	No.
Local community group	<p>Major concern is that the CCAP does not deal adequately with the issue of flood risk and flooding. The CCAP does not sufficiently recognise the anticipated impact of climate change on increasing flood risk and flooding. Furthermore, its focus on fluvial and pluvial sources of flooding, obscures the major impact of hydrology in areas bordering major rivers, notably the Thames.</p> <p>Essentially, everything built in the area around Staines on both sides of the Thames sits on and penetrates a layer of gravel. This sits on top of a floor of impermeable clay. Vast quantities of water flow through the gravel adding considerably to the effects of fluvial and pluvial sources of flooding. The foundations of buildings, particularly deeper foundations for taller buildings, exacerbate this problem considerably by impeding free flows through the gravel.</p> <p>The CCAP should be more robust and explicit in restricting the number and particularly height of developments in a wide ribbon adjacent to major rivers such as the Thames, and recognise that what goes on in neighbouring Spelthorne has an equal effect on flood risk and flooding on the Runnymede side of the Thames. RBC has not registered an objection to Spelthorne's Local Plan which calls for a massive over-development of Staines with multiple tower-block developments with deep foundations. The Environment Agency (EA) has registered strong objection to most of the sites in Staines under consideration and in September 2022 declared the Plan</p>	<p>RBC is aware that increased river and surface water flooding (and particularly flash flooding) is a climate risk for Runnymede and its residents, and is an issue that needs full consideration. Ensuring that new development in the Borough is able to withstand flooding events and is located in suitable areas based on future flood risk is crucial to enable adaptation. Actions have been included in the CCAP to help build resilience, primarily through the Local Plan Review and by supporting the delivery of the River Thames Scheme. It is not the role of the CCAP to restrict the number and height of developments in the vicinity of the Thames. This is a matter for individual Local Plans and Development Management decisions of the relevant local authority.</p> <p>However, amendments can be made to the introductory chapter, to Local Plan Review actions and to the River Thames Scheme action to address points raised in the representation. Any revised Local Plan policies, including the spatial strategy, will be based on evidence, including an updated Strategic Flood Risk Assessment. A new action 5.1.4 has been added to make it clear that RBC will update this evidence. Minor amendments have been made to action 5.5 to</p>	<p>Yes. Amend introduction to make it clear that the Council recognises the climate risks the Borough faces, including flooding, and that the Action Plan includes actions to build resilience to these risks.</p> <p>Amend action 5.5 to make it clear that the Council will work with partners on other flood mitigation initiatives, as well as the River Thames Scheme.</p>

	<p>'unsound'. Spelthorne Borough Council, in defending the best interests of its residents, should have given the EA position aggressive support. Instead it registered no objection.</p> <p>In summary, the CCAP should be strengthened by 1) recognising more clearly and prominently the sources and growing problem of flood risk and flooding, and 2) reflecting this in a much more explicit and robust plan to mitigate the problem (not least in restricting developments on the Runnymede side of the river and in pressing for a similar policy on the Spelthorne side.</p>	<p>make it clear that RBC will work with its partners on other flood mitigation initiatives as well as the River Thames Scheme which focuses only on the River Thames.</p> <p>RBC is aware of the Environment Agency's response to Spelthorne Borough Council's submitted Local Plan. The Council is engaged in ongoing discussions with Spelthorne Borough Council under the Duty to Cooperate on a range of matters associated with its emerging Local Plan, and will consider whether it wishes to make further representations (should RBC be provided a further opportunity to do so as part of a resumed examination), based on any revised evidence produced.</p> <p>Finally, RBC will be working with SCC to deliver the county-wide Climate Change Adaptation and Resilience Strategy, known as "Surrey Adapt", and a new action 5.8 has been included to support its delivery. The Strategy sets out several strategic priorities which partner authorities will help deliver, including those which identify climate resilient measures for flood risk reduction (see comments below).</p>	
Surrey County Council	<p>Overall, the CCAP is comprehensive, ambitious and shows strong leadership and a focus on the areas where the Council can make a big impact in reducing emissions and creating co-benefits for communities. Pleased to see its development draws on existing action plans from the 12 authorities making up the Greener Futures Partnership Steering Group, and appreciate the commitments to support the delivery of the Greener Futures Climate Change Delivery Plan 2021-2025. SCC will also continue to support the delivery of the Runnymede Action Plan.</p>	<p>Comments relating to the support of various actions are noted, and RBC will amend the CCAP to make reference to the newly adopted Surrey Climate Change Adaptation and Resilience Strategy. Many of the actions within the existing draft CCAP will already deliver some of the strategic priorities of the Strategy at borough-level, for example, the Local Plan Review actions will help deliver the priority to review and update local planning policy frameworks to facilitate climate resilient residential development, and the 'Supporting</p>	<p>Yes. Add new action 5.8 stating that as a member of the Greener Futures Partnership Steering Group, review SCC's Climate Change Adaptation and Resilience Strategy and identify how RBC can contribute to its delivery.</p>

	<p>Welcome the continued commitment to support SCC and delivery agents such as Action Surrey to promote funding opportunities and help residents improve energy efficiency of their homes, and to reduce emissions associated with transport. Also supportive of Local Plan Review actions to strengthen climate change planning policies, delivering health and economic co-benefits for Surrey.</p> <p>Suggest that the CCAP includes a reference to Surrey Climate Change Adaptation and Resilience Strategy and includes actions related to the nine priority programmes in the Strategy, which was produced collaboratively as part of the Greener Futures Partnership Steering Group.</p> <p>Greener Homes & Buildings Actions As part of implementing action 1.2.3 (consider introducing a carbon offsetting scheme ...) we would suggest that the Borough Council strategically examines their projects to pinpoint potential offsetting opportunities and engages with other local partners to collaboratively identify and implement effective emission reduction measures. This holistic approach would ensure accurate monitoring and successful achievement of net zero targets within the broader community context. Additionally, we would suggest consolidating the various actions related to financial measures into a dedicated funding action plan to provide a comprehensive overview of the current financial deficit in achieving net-zero targets and outlining the requisite measures to address and bridge this gap.</p> <p>Active & Sustainable Travel Actions Action 3.2 should make reference to our new Healthy Streets for Surrey design code. The SCC Transport Development Planning team would be happy to work with RBC on action 3.2.1 to strengthen active and sustainable transport planning policies. In implementing this action, reference should be made to the Healthy Streets design code and Surrey Local Transport Plan 4. We are pleased to read actions 3.4 and 3.6. We are committed to continue</p>	<p>our Communities' actions will help enhance community engagement on climate change risks and impacts and climate resilient homes.</p> <p>The comments under Greener Homes & Buildings Actions are noted, and this holistic approach will be considered as part of establishing any carbon offsetting scheme as appropriate, and any funding gap would need to be assessed as part of this exercise.</p> <p>RBC is aware of the Healthy Streets for Surrey design code and Local Transport Plan 4 – both of these documents will be key in informing revisions to the Local Plan in the implementation of action 3.2. However, specific references to these documents have not been inserted because a variety of other evidence base documents will also be used to inform revised planning policies. Support from the Transport Development Planning team would be welcome.</p> <p>RBC is aware of Surrey's Green and Blue Infrastructure Guide and this will be used to inform the development of the Council's GBI Strategy, however, specific reference to Surrey's guide has not been included as a number of other guidance documents will also be used to inform development of the Strategy.</p> <p>Support for actions 5.4.1 and 5.3.2 is welcome, and comments regarding the application for Treescapes funding is noted. Minor amendments to the action will be made to open up the possibility of RBC applying individually if SCC chooses to not apply. Action 5.3.2 refers to the use of funds</p>	<p>Amend actions 3.6.3, 3.6.4, and 3.6.5 to refer to the Local Street Improvement programme.</p> <p>Amend action 5.4.1 to state that a bid for Local Authority Treescapes Fund could be prepared individually or in partnership with SCC.</p>
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	<p>to work with the borough council through the Joint Infrastructure Group.</p> <p>Amend any references to Liveable Neighbourhoods programme to Local Street Improvements programme.</p> <p>Natural Environment & Biodiversity Actions Action 5.2 is supported. Reference should be made to the SCC Green and Blue Infrastructure Guide which refers to Runnymede Borough Council's Green and Blue Infrastructure SPD.</p> <p>Support action 5.4.1 (Work with SCC to prepare and submit bid for Local Authority Treescapes Fund to restore tree cover in non-woodland areas) and action 5.3.2 (Continue to plant new hedges and trees using the Local Authority Treescapes Fund and other available funding). SCC have worked with the borough council on the Treescapes fund for the past three years and are fully committed to continue to support and help. We would, however, note that the Treescapes fund has recently opened out to both upper and lower tier authorities, therefore there is a possibility that SCC may not necessarily apply. Also, please note that the Local Authority Treescapes fund does not fund hedges so action 5.3.2 should be reworded to only refer to planting new trees.</p>	<p>including the Treescapes fund – other funding may be identified to allow for the planting of new hedges.</p>	
National Highways	<p>Attention is drawn to the National Highways document 'The Strategic Road Network, Planning for the Future: A guide to working with National Highways on planning matters' (October 2023). This document sets out how National Highways intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. The document indicates that National Highways will review and provide comments on local plans proposed by local planning authorities that have the potential to affect any part of the SRN.</p>	<p>Reference to the National Highways document is noted and will be used in the preparation of the revised Local Plan. RBC will consult with National Highways at appropriate stages during this process, including on any site allocations which will affect the strategic road network.</p> <p>Support for ongoing collaborative work and discussion noted. This is reflected in the CCAP, particularly action 3.7 which identifies</p>	<p>As above - amend action 3.7 to make it clear that RBC will continue to work collaboratively with bodies including National Highways to lobby for investment in strategic road network schemes to ease congestion in the Borough and</p>

	<p>Specifically concerned with any proposals which have the potential to impact the M25 and M3, which are within or in close proximity to the Runnymede area and are subject to congestion at peak times. The draft CCAP does not reference any proposed development allocations within the area, and therefore there is unlikely to be any potential for significant impacts to the SRN at present. National Highways would expect to be part of early discussions with both developers and the Council for any proposed future development which is likely to have a significant impact on the SRN.</p> <p>Welcome the targets in the CCAP to deliver sustainable development, to achieve the Council's net zero targets, and to focus on collaborative work with partners and stakeholders. Supportive of any policies which may off-set strategic car journeys that could otherwise travel on the SRN. Look forward to continuing to participate in future consultations and discussions.</p>	<p>the importance of collaborative working with partners.</p>	<p>facilitate safe active travel.</p>
<p>Historic England</p>	<p>Welcomes the CCAP but concerned that it may lead to inadvertent, but possibly damaging and unlawful, impacts on the historic environment and heritage assets. It is important to recognise in such documents that historic buildings are likely to be of traditional construction and require a different approach to buildings of modern construction. Include in actions 1.3-1.6 – concerning retrofitting - references to the potential need to gain appropriate planning and heritage consents, and avoid harm to heritage assets by undertaking works to improve energy efficiency in ways that are compatible with their protected status. Reminder that listed building consent is required for all works that affect the significance/special interest of a listed building irrespective of the need for planning permission. Scheduled Monument Consent must be obtained before any works to a scheduled monument.</p> <p>There are three main considerations when considering works to a historic building:</p>	<p>Action 1.1.4 seeks to adopt a Net Zero Carbon Toolkit to encourage developers to go beyond Local Plan standards and achieve net zero housing developments. The Toolkit contains chapters on new build development, and on retrofitting of existing housing. Both chapters contain detailed information about how to achieve balanced solutions for heritage assets, and emphasises that the Development Management team should be contacted before any works are undertaken to the historic environment and heritage assets to ensure the appropriate planning and heritage consents are considered. Any training sessions / awareness raising campaigns (action 1.1.5) with local developers, DM officers and other agents will also focus on this important point. Pre-application advice (action 1.1.7) would also highlight this issue.</p>	<p>Yes – amend action 1.6.2 to add that any publicity should signpost readers to any necessary planning and heritage consents to raise awareness that there are procedures that must be followed to avoid harm to heritage assets.</p>

	<ul style="list-style-type: none"> - Would the works be effective and compatible with the way the building performs? - Would they harm the significance of the building or conservation area? - What planning permission(s) or consents would be required? <p>Some works in response to climate change would be so harmful to a building’s heritage significance that they would not be approved, but in other cases some impact on significance might be balanced against real climate change benefits.</p> <p>Historic England advocates a ‘whole-building approach’ to making energy and carbon savings that uses an understanding of a building in its context to find balanced solutions that save energy, sustain heritage significance, and maintain a comfortable and healthy indoor environment. A balance needs to be struck between maximising the benefits from mitigation and adaptation to climate change and minimising harm to the historic environment.</p> <p>Historic England guidance is available about how an integrated approach to climate change and the historic environment can be achieved: Impacts of Climate Change Historic England, and recent annual Heritage Counts report: 2019 – Carbon in the Built Historic Environment Historic England. Draft guidance on ‘Climate Change and Historic Building Adaptation’ is also available – publication due later this year. This should be referenced within the document.</p>	<p>A Climate Change Study has also been produced to underpin the Local Plan Review which also stresses the importance of achieving balance between climate change benefits and avoiding harm to a building’s heritage significance. This evidence will be used to inform revised Local Plan policy. The guidance signposted in the response will also be used to help inform the development of revised local planning policy and guidance.</p> <p>Action 1.2.6 seeks to develop a Design Code for Runnymede. RBC will draw from Historic England guidance to ensure that any codes focusing on net zero design and adaptation also address the need to avoid harm to heritage assets. The Design Code will also draw from guidance in the existing Design SPD, which has a chapter on responding positively to local history and sets how “Where heritage assets may be affected, applicants should demonstrate a thorough understanding of their significance”.</p> <p>Actions 1.3-1.5 involve the decarbonisation of Council housing and estate buildings. Any works will be subject to the necessary planning permissions and heritage consents as appropriate. RBC recognises that works that could affect the heritage significance of any of its housing or assets, and therefore be subject to planning permission and/or heritage consent, would need to take account of Local Plan heritage policies, design guidance and Historic England guidance as highlighted in the response. Action 1.6 seeks to develop a communications programme to encourage and facilitate the retrofitting of energy efficiency and renewable/low carbon technology</p>	
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		schemes in homes and buildings across the borough. A sub-action can be amended to ensure that communications signpost the audience to the necessary planning permissions and heritage consents, and avoid harm to heritage assets by undertaking works to improve energy efficiency in ways that are compatible with their protected status.	
Woking Borough Council	Appreciates the ambition of its neighbouring authority in meeting net zero emissions across Runnymede Borough by 2050.	Support noted.	No.