



RUNNYMEDE BOROUGH COUNCIL

**RUNNYMEDE BOROUGH COUNCIL DRAFT ENERGY
SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

**TOWN & COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012 (AS AMENDED)**

**REGULATION 12 STATEMENT OF CONSULTATION
AND STATEMENT OF REPRESENTATIONS PROCEDURE**

May 2024

1. Introduction

- 1.1 This statement sets out the work involved in preparing the draft Runnymede Borough Council Energy Supplementary Planning Document (SPD) for public consultation and how the Council has engaged various stakeholders during the course of preparation.
- 1.2 The Town & County Planning (Local Planning) (England) Regulations 2012 ('the Regulations') set out in Regulation 12 that before a local planning authority adopts a Supplementary Planning Document (SPD), they must prepare a statement (Statement of Consultation) setting out:
- i) The persons the local planning authority consulted when preparing the SPD;
 - ii) A summary of the main issues raised by those persons; and
 - iii) How those issues have been addressed in preparing the draft SPD.
- 1.3 After the consultation on the draft SPD, this statement will be updated to reflect the feedback received and will set out how this has been considered in the final version of the SPD. The final Statement of Consultation will be published alongside the SPD for adoption, in line with the Regulations.
- 1.4 Regulation 12 also requires that for the purpose of seeking representations, copies of the Statement of Consultation must be made available with the SPD with details of:
- i) The date by which representations must be made; and
 - ii) The address to which they must be sent.

2. SPD preparation and early stakeholder and community involvement

- 2.1 As part of preparing the draft SPD, early stakeholder and public engagement took place, including:

- Scoping engagement

Proposals to create energy guidance to supplement the implementation of energy-related policies of the 2030 Local Plan (notably parts of Policy SD7: Sustainable Design and the entirety of Policy SD8: Renewable & Low Carbon Energy) were discussed at a various community events, senior officer and councillor meetings as part of early engagement activity in developing the Council's Climate Change Action Plan (which supports delivery of the Council's Climate Change Strategy). Planning constraints were identified as a potential barrier to climate change action in addressing the climate emergency, and discussion points included scope for the Council to commit to producing a suite of documents to improve the delivery of energy efficient, net zero/low carbon buildings via actions under the 'greener homes and buildings' theme in the Action Plan. The potential content and structure of an SPD was discussed.

The outcomes of the Council's Climate Change Study were presented at a Climate Change Members Working Party in November 2023. The Study recommended producing supplementary planning guidance as an interim measure ahead of strengthening climate change planning policies as part of the Local Plan Review, and options for an SPD were discussed with councillors.

The events and meetings were held on the following dates:

- Focus group session with local residents and voluntary groups, including members of the Community Planning Panel, on Monday 24 July 2023;

- Climate Change Officers Working Group Meeting – 31 July 2023;
- Community Town Team and Action Group Meetings with local residents, voluntary groups and local councillors in Egham, Chertsey, Addlestone, and Englefield Green on 11, 13, 19 and 20 September 2023 respectively;
- Planning Committee – 25 October 2023 (Local Plan Update Report, including options to produce energy guidance);
- Climate Change Members Working Party – 22 November 2023 (Climate Change Study outputs, including recommendations to produce energy guidance).

The feedback received was assessed and where possible, adjustments were made to the proposed scope of the SPD, including reference being made to an adapted version of the Cotswolds, West Oxfordshire and Forest of Dean Councils Net Zero Carbon Toolkit (produced under Creative Commons License and openly available for other local authorities to amend and adopt) to promote best practice over and above minimum 2030 Local Plan standards.

- Pre-consultation engagement

An early draft of the energy guidance was shared with senior Development Management officers for review in advance of public consultation, with particular focus on information requirements for different types of development; for different types of planning application; and the methodology for calculation the percentage of energy demand generated through the provision of renewable and/or low carbon technologies at step 3 of the energy hierarchy. These sections were updated to reflect feedback received.

An early draft was also shared with the Council's heritage consultant to review relevant sections relating to the sensitive management of heritage assets. Feedback indicated that these sections would provide useful clarity about the process i.e. understanding the asset; considering any opportunities for energy efficiency; and assessing any impacts.

- 2.2 Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening has also taken place on the draft SPD in consultation with three statutory consultees (Environment Agency, Natural England and Historic England), concluding that a full SEA and Appropriate Assessment is not required for the SPD. The responses received and how they were addressed can be found in the SEA/HRA Screening Determination for the draft Energy SPD, available alongside the SPD consultation materials.

3. Summary of the main issues raised by stakeholders during the preparation of the draft SPD and how they have been addressed

- 3.1 Some of the main issues raised during the preparation of the SPD have included:
- A desire to implement net zero carbon standards which go above and beyond the minimum requirements of the 2030 Local Plan: reference to the Council's recently adopted Net Zero Carbon Toolkit has been included in the draft SPD to encourage developers to go above and beyond the minimum requirements of the Local Plan. However, as there are limitations on the introduction of new policies in an SPD¹, a clear distinction has been made between the existing planning

¹ Made clear by the National Planning Practice Guidance at: [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/plan-making) (Paragraph: 008 Reference ID: 61-008-20190315), and Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

policy requirements, and best practice guidance in working towards net zero carbon standards.

- A desire for additional themes to be included in the SPD to address climate change adaptation: an SPD addressing a wider number of climate change themes was considered, for example to include green infrastructure, ecology, waste and materials and sustainable drainage, but officers felt that this would duplicate existing guidance such as the Green & Blue Infrastructure SPD², and Surrey County Council guidance³. Development Management officers in particular felt that concise guidance would be more beneficial and useful for both developers and decision-makers.
- Difficulty in dealing with development resulting from change of use under permitted development rights: the Council has limited power to influence any change of use development which does not require planning permission. However, a section has been included in the draft SPD to explain how change of use development which requires planning permission should apply the renewable and low carbon energy requirements of the Local Plan.
- The belief that the SPD should also address unregulated energy: during the preparation of the 2030 Local Plan, all policy requirements were assessed for viability – including its energy requirements – to ensure that the cumulative cost of all relevant policy requirements would not undermine deliverability of the Plan. The assessment assumed that only regulated energy needs would be modelled in implementing the requirements of Policy SD8, and the SPD cannot therefore introduce new policy requirements extending to unregulated energy. However, the best practice guidance included in the draft SPD encourages developers to consider ‘operational energy’, including unregulated energy, wherever possible.
- A desire for all scales of new development to apply the energy hierarchy: the draft SPD includes a section on ‘Information Requirements’ which clearly sets out what information should be submitted in support of planning applications for both major and non-major development. A questionnaire has been included at Appendix 1 to ensure non-major proposals consider the relevant energy and sustainability issues in a proportionate manner.
- To produce guidance on balancing the need to mitigate climate change, and the need to mitigate potential impacts on heritage assets when being retrofitted with energy efficiency measures. A section has been included to provide clarity on this in the draft SPD.

3.2 As described above, amendments were made to the scope and content of the SPD to address, where possible, the issues raised in early engagement activities.

4. Next Steps

4.1 The next stage in the process is to undertake formal consultation on the draft Energy SPD, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The consultation will run for eight weeks from Wednesday 5 June until 11.59pm on Wednesday 31 July 2024. The minimum period as set out in the Regulations and the Council’s 2021 Statement of Community Involvement is four weeks, but an additional four weeks will allow more time for views to be prepared and submitted.

² Available at: [Supplementary Planning documents and other guidance – Runnymede Borough Council](#)

³ Available at: [Sustainable Drainage System Design Guidance - Surrey County Council \(surreycc.gov.uk\)](#)

- 4.2 The consultation material will be promoted in a number of ways, and people will be invited to submit comments by completing a Word version of the consultation response form and returning it by email or by post, or by emailing/posting written comments.
- 4.3 During the consultation, officers will be available to answer any queries, with contact details provided on the consultation website and on the response form.
- 4.5 Following the consultation, all comments received will be carefully reviewed and any amendments will be made to the draft SPD. A final version of the SPD will be prepared and presented to the Planning Committee for consideration to adopt it. It is anticipated that the SPD will be presented at Committee in Autumn 2024, although this is subject to the volume and nature of comments received during public consultation. A further version of this Statement of Consultation will be prepared at adoption stage, as required by the Regulations.

5. Statement of Representations Procedure

- 5.1 The Council is holding public consultation of the draft Energy SPD for a period of eight weeks between Wednesday 5 June and 11.59pm on Wednesday 31 July 2024.
- 5.2 Representations can be submitted via email to planningpolicy@runnymede.gov.uk. A representation form is available on the [consultation website](#) to help structure comments, but it is not a requirement to use the form.

It is the Council's preference for comments to be submitted electronically. However, written comments can also be submitted by post to:

Planning Policy Team
Runnymede Borough Council
Runnymede Civic Centre
Station Road
Addlestone
KT15 2AH

- 5.3 Anyone can make a request to be notified of when the SPD is adopted in their representation.
- 5.4 The draft SPD and supporting material is also available for inspection at the Civic Centre in Addlestone from 8.30am-5pm Monday to Thursdays, and 8.30am-4.30pm on Fridays, and at the following locations: -
- Addlestone Library (if required outside of Civic Office hours), Runnymede Civic Centre, Station Road, Addlestone, KT15 2AF
 - Chertsey Library, Guildford Street, Chertsey, Surrey, KT16 3BE
 - Egham Library, High Street, Egham, Surrey, TW20 9EA
 - New Haw Community Library, The Broadway, New Haw, Surrey KT15 3HA
 - Virginia Water Community Library, 6 Station Parade, Virginia Water GU25 4AB
- 5.5 Details of library opening times can be found on the Surrey County Council website at <https://www.surreycc.gov.uk/libraries>.