RUNNYMEDE BOROUGH COUNCIL

RUNNYMEDE DESIGN SUPPLEMENTARY PLANNING DOCUMENT (SPD)

TOWN & COUNTRY PLANNING (LOCAL PLANNING)(ENGLAND) REGULATIONS 2012

REGULATION 12 STATEMENT OF CONSULTATION

- 1.1 The Town & County Planning (Local Planning)(England) Regulations 2012 require in Regulation 12 that before a 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 the SPD
- 1.2 This document is the Statement of Consultation for the Runnymede Design SPD and sets out the persons the Council consulted in preparing the SPD and how their comments have been addressed.
- 1.3 A list of all those persons consulted on the Runnymede Design SPD are set out in Appendix A.
- 1.4 The Council consulted with the three statutory bodies (Environment Agency, Historic England, Natural England) in preparing the SPD and their responses and how these were taken into account can be found in Appendix B. The Council also consulted the statutory bodies on a Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) screening and the responses received and how they were addressed can be found in the SEA/HRA Screening Determination for the Runnymede Design SPD (October 2020). Appendix B also summarises additional early engagement which took place during the preparation of the Runnymede Design SPD.
- 1.5 The Council held public consultation on the draft SPD between Thursday 15th October to Sunday 29th November 2020. 8 representations were received during the period of consultation, and 1 further late representation was also accepted. A summary of these and how they were taken into account can be found in Appendix C. Appendix C also lists additional changes which are proposed to be made to the SPD by the Council prior to adoption. These are largely minor changes (often correcting typographical errors) as well as other corrections to ensure the overall accuracy of the content within the SPD.

Appendix A - List of Persons Consulted on the draft Runnymede Design SPD

As well as the persons listed below a further 268 private individuals on the Planning Policy consultation database were consulted.

Brooklands College	Highways England
Elmbridge Borough Council	Affinity Water
The Ottershaw Society	Plainview Planning
Bigbury Neighbourhood Plan Steering Group	Mayor of London
Windlesham Parish Council	London Borough of Hillingdon
Wraysbury Parish Council	Historic England London and South East Region
CBRE Ltd	ASC Finance for Business
Rushmoor Borough Council	The Runnymede on Thames
Barton Willmore	Halogen UK
Free Schools Capital Education and Skills Funding Agency	JR Marine
Homes England	Thorpe Park (Merlin Entertainments Plc)
Civil Aviation Authority	Rainbow Day Nursery & Pre-School
Ashford & St. Peter's Hospital NHS Foundation Trust	Home Builders Federation
Natural England	Calatec Ltd
Terence O'Rourke Ltd	Stellican Ltd
Youngs RPS	Adams Group Real Estate Ltd (on behalf of Tarmac)
The Emerson Group	Fairhurst
Carter Jonas	Tarmac
Lyne Hill Nursery	Carter Planning Ltd
Anderhay	Tandridge District Council
Hodders	Tetlow King Planning
Savills obo Thames Water	The Planning Bureau Ltd
WYG	John Andrews Associates
Fortman Land & Planning	Turley
Richborough Estates	SETPLAN
Blue Cedar Homes	Strutt & Parker
Vanbrugh Land	Urban Green Developments
Bracknell Forest Council	DHA Planning
Surrey Wildlife Trust	Reside Developments
Planning Potential Limited	Ashill Group
JSA Architects	Woolf Bond Planning
Berkeley Homes	SSA Planning
Stride Treglown Ltd	Shanly Homes
Shrimplins	Lichfields
Surrey County Council	DPDS Consulting
DevPlan	Pegasus Planning
Paul Dickinson and Associates	IQ Planning Consultants

Rickett Architects	WSP Indigo
Bell Cornwell	Re Creo
Montagu Evans LLP	Grosvenor Capital
Woking Borough Council	Sport England
Revera Limited	Aston Mead Land & Planning
Devine Homes	Heatons
DP9 Ltd	Pegasus Group
Porta Planning LLP (representing Centrica plc (British Gas)	Quod
Guildford Borough Council	AR Planning
Armstrong Rigg Planning	Sanders Laing
Optimis Consulting	Gladman Developments Ltd
Kinwell Property Investments Ltd	LRG
Vail Williams LLP	Wates Developments
Kevin Scott Consultancy	Allied Telesis
R Clarke Planning Ltd	Glanville Consultants
Transport for London	Avison Young obo National Grid
Meadowcroft Community Infant School	TASIS The American School in England
Wokingham Borough Council	Meath School
BLARA, BENRA, RRA & RAR	Philip Southcote School
Runnymede Access Liaison Group, Elmbridge & Runnymede Talking Newspaper Association, Runnymede Disabled Swimmers Board, Surrey Coalition of Disabled People, North Surrey Disability Empowerment Group, Surrey Vision Action Group	The Kings Church
The Ramblers	West Addlestone Residents Association
The Georgian Group	The Gardens Trust
Virginia Water Community Association	Turn2us
Friends families and travellers	Chertsey South Residents Association
Wentworth Residents Association	Franklands Drive Residents Association
Stonehill Crescent Residents Association Limited Company	The Twentieth Century Society
Egham Residents' Association	Waverley Borough Council
Runnymede Art Society	Thorpe Village Hall
Woburn Hill Action Group	Addlestone Historical Society
RSPB England	Woodham Park Way Association
Christian Science Society Egham	Neighbourhood Planning Services
Environment Agency	United Church of Egham
Imperial College	Kennedy Memorial Trust
CMA Planning	CPRE Surrey
Theatres Trust	Woodland Trust
Thorpe Ward Residents' Association	Chertsey Good Neighbours
Runnymede Council Residents' Association	Chobham Commons Preservation Committee
Laleham Reach Residents' Association	

St. Paul's Church	Office of Road and Rail
WSPA	Enterprise M3 LEP
UW Club	Slough Borough Council
Spelthorne Borough Council	South East Coast Ambulance Service NHS
	Foundation Trust
Royal Borough of Windsor and Maidenhead	East Berks CCG

Appendix B - Consultation responses/early engagement during the preparation of the Runnymede Design SPD and how comments were addressed

Persons	Summary of Main Issues	How Addressed
Environment Agency	No comment	No action required
Historic England	The SPD will inform decisions with regard to the design of new development across the Borough Council's area of influence. This is likely to include development affecting heritage assets both designated and non-designated. The design of development goes beyond physical appearance to include aspects such as scale, layout and density of development. These are factors that could have effects for heritage assets where the guidance contained influences the design of development affecting them. As such we are interested to be consulted on the emerging SPD. Having, very briefly reviewed the draft SPD documents, there are a number of areas where we would hope to comment to ensure that it conforms within the advice set	No specific comments to be addressed at this stage. Historic England was subsequently consulted on the draft Design SPD as requested.
	out in the NPPF with respect to the management of impacts on the historic environment and, as such, we look forward to being informed of the formal public consultation on the document.	
Natural England	No comment	No action required

- 1.6 In addition to the above, a meeting was held with ward Councillors (14 in total) on 9th October 2018. The aim of the workshop was to introduce the work being done on the Design SPD, to explain the purpose of the SPD and to explore a number of issues around design with Councillors. Focussed discussions were held around the following topics:
 - -What is good in your ward, and in Runnymede more generally?
 - -Key issues experienced when making decisions on design
 - -Tension between character and prescriptive standards
 - -Design exercise reviewing case study in the Borough
- 1.7 Feedback from this session was used by the Council's consultant Tibbalds to shape the Runnymede Design SPD.
- 1.8 A meeting was also held with the Council's Community Planning Panel on 10th October 2018. A representative from each of the following Residents' Associations attended:
 - -Egham Residents Association
 - -Chertsey Society
 - -Hamm Court Ltd
 - -Lyne Residents' Association
 - -Thorpe Ward Residents' Association
 - -West Addlestone Residents' Association
 - -Runnymede Access Liaison Group
 - -Chertsey South Residents Association
 - -Wentworth Residents' Association
- 1.9 The aim of the workshop was to introduce the work being done on the Design SPD, to explain the purpose of the SPD, and to explore a number of issues around design with attendees.
- 1.10 Specifically, there were a number of round table discussions held with attendees. Each of these focussed discussions were followed by a feedback session. Feedback was minuted and used by the Council's consultant Tibbalds as they prepared the Runnymede Design SPD. Discussions focussed on topics such as:
 - -what is good in your area and in Runnymede? Where has design worked well, and why?
 - -Can you think of any examples of bad design? What factors contribute to the poor design?
 - -What are your experiences of design-based decisions?

- Do you review development proposals and submit comments to support/object?
- Do you think about design when doing so? What do you think about?
- What is your experience and knowledge of how the Council assesses development proposals?
- What do you find difficult and would like to know more about?
- -Reflected on your experiences of design, and your involvement in shaping design outcomes, how could the Design SPD help you in commenting on a planning application?
- -How would a Design Guide help you shape development and ensure that the best design is being achieved in your area?

Appendix C - Summary of Representations to the draft Runnymede Design SPD and the Council's Responses, as well as summary of additional changes proposed to be made to the SPD by Council officers.

Name	Response	Comment	Amend SPD?
Transport for London	No Comments	N/A	No
Highways England	No Comments	N/A	No
EGV Forum Steering Committee	1-I think that some of the areas on Tile 1, page 65 of the draft design codes have been drawn inaccurately. Whilst the area designated type 5 (Institutions in the Green Belt) to the north of Englefield Green Village centre (Cooper Hill Area) should cover the Hok development and Kingswood House and possibly the Playing Fields, it seems also to extend south past Kingswood House and East into what is now the housing development (in the Green Belt) currently being built by developers (and some of this new development does not seem to be designated at all.) The latter should	1/2 Officers agree with the comments made regarding Tile 1 and have updated the tile to ensure that the areas highlighted accurately reflect the character area boundaries in the key. This has resulted in revisions to the following character areas – 2a Formal suburban – Town) 2b (Formal Suburban – landscape) 3 (dispersed) 4 (Commercial) and 5 (institutions in the Green Belt)	Yes
	surely be part of area 2b, and in brown ffor 21st century development? 2-You also designate Areas 5 as 'Institutions in the Green Belt' whilst all other areas are designated with a simple title regardless whether they are in the Green Belt or not. For consistency, either Green Belt should be included in all titles	Officers also agree that the Former Brunel University site should be included as 21 st Century as this comprises new development – The title of this designation has been changed from 21 st Century Urban to 21 st Century.	Yes
	where relevant, or no titles at all, or the designation 'Institutions in the Countryside' should be used per page 64	Changes have also been made to the following maps to ensure that the areas highlighted accurately reflect the character area boundaries in the key: Tile 2 - Chertsey and Chertsey South (page 66)	Yes

	Tile 3 - Addlestone, Rowtown, Ottershaw, Woodham and New Haw (page 67)	
	In response to the above changes, the map on page 7 has also been removed as it has been superseded by the updated maps (tiles) highlighted above. The map on page 9 has also been removed as it referred to the old Local Plan.	Yes
	Egham Town Centre Map (page 71) and Chertsey Town Centre map (Page 73) have also been updated to make the different colours in the key more distinct and to include the updated Conservation Area boundaries.	Yes
	Runnymede is characterised by a number of large institutions which are located within the Green Belt. This is considered to be an important character area within the Borough which should have its own designation. It is important that reference is made to their Green Belt location as this forms part of their character. 'Institutions in the Countryside' has been amended to 'Institutions within the Green Belt' on the maps.	165
3-I might easily be wrong, but I can find no reference to the National Design Guide (Oct 2019). Is this not relevant?	3-The document notes that the SPD should not be read in isolation, rather it be read in conjunction with other local policies, in addition to the National Design Guide. – see page 4	No No

	4-Could you please review the accuracy of your designations and the areas they cover; it is important to us, as we are currently engaging AECOM to produce design codes for sub areas of Englefield Green, and therefore the main divisions you have identified if not accurate may impinge on our ability to accurately sub divide some of the EGV Forum Area.	4-The Maps and Tiles as highlighted above have been updated. However it should be noted that the Design Guide is a borough wide document which includes broad character areas across the Borough. Any future documentation produced to support the Englefield Green Neighbourhood Plan (including design codes for individual areas within Englefield Green) is anticipated to use the Borough wide Design Guide as a starting point but add a further layer of locally specific detail. On this basis, it is not considered that the Design Guide will detrimentally impact upon any future documentation or policy put forwards by the EGV Forum Area.	No
	Codes in general to be a very positive step forward, and believe they will be a very good reference document in our work on the EGV Plan!		
Egham Residents' Association	1-The Egham Residents' Association called for the composition and inclusion of a design guide for the borough in our response, in February 2018, to the Runnymede 2030 Draft Local Plan Consultation.	1-Comments noted	No
	2-We are very pleased, therefore, to see this new "design guide" that is proposed to "supplement policies within the Local Plan". Its publication came soon after that of the Government's "Planning for the Future" White Paper in which considerable emphasis is placed on enhancing the importance and function of design in the planning process.	2-Comments noted	No
		3-Comments noted	No

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3-We are hopeful that these two documents will lead to a brighter future in design terms for Runnymede Borough. And not before time, one might add.		
4.14	4-Comments noted	No
4-It was said of Sir Christopher Wren that "if you seek his		
memorial, look around you". Similarly in Runnymede it can		
be said that if you seek memorials to the inadequacy of past design guidance and control, just look around.		
design guidance and control, just look around.	5-Comments noted. All past planning	No
5-In Egham and beyond there is no shortage of buildings	applications would have been carefully	140
that should never have been granted planning permission.	considered against national guidance and	
Some of them are simply ugly; others are just 'anytown,	the Council's adopted local plan policies.	
anywhere' edifices that people pass daily without really	Letters of representation received and	
noticing they are there. In both cases, no regard has been	consultee responses would also have been	
paid to the character and history of the surrounding area,	carefully considered by Officers prior to the	
and the main factor seems to have been to fill a hole as cheaply as possible.	granting of planning permission. The officer reports for the individual applications will set	
cheapty as possible.	out the key considerations and the	
	reasoning behind the Council's decisions to	
	grant planning permission in each case.	
	6-Noted. See response to point 5.	No
6-Arguably the most glaring example of bad design in		
Egham is the Precinct complex in the High Street. Such a		
model of 1960s' grot is this that some people think it should be listed on a 'let this be a lesson to you' basis. Another is		
the horrible little office box plonked in front of St John's		
Church.		
	7-Noted. See response to point 5.	No
7-ERA has supported the Gateway West development in	· · ·	
the town centre in principle, but design is hardly its		
strongest selling point. We are troubled by the height of two		
of the buildings in particular, which promises/threatens to		
change the Egham skyline for the rest of the century if not		
longer. We also think there is inadequate parking provision.		

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In truth, furthermore, no great effort has been made to reflect the character of the rest of the town centre.		
	8-Noted. See response to point 5.	No
8-The 40-44 High St site has, moreover, become something		
of a horror story in design terms. It stands right at the		
'gateway' to the core of the shopping centre. One of its		
buildings looks absolutely resplendent in a photograph		
taken in 1911 that is in 'The Egham Picture Book'. It should		
have been restored, but it now awaits demolition - to make		
way for a building that will stand out only by being so very		
average and predictable in design.		
	9-Noted. See response to point 5.	No
9-At Royal Holloway, moreover, the glory of the original		
building has been offset in recent times by a collection of		
structures that look as if they were designed by a child and		
have come off a conveyor belt. Thomas Holloway must be		
turning like a spinning top in his grave.		
	10-Comments noted. Future development	No
10-One of the tragedies of all this is that so much rancour	proposals will be assessed carefully by the	
and regret could have been avoided by the paying of proper	Council against national policy and adopted	
regard to design. Change does not have to be for the worse.	local plan policies prior to the granting of	
There is no rule saying that buildings full of character have	planning permission. Once adopted, this	
to be replaced by inferior ones. But in the Egham landscape	Design SPD will also be a material planning	
- along with much of the rest of the country - people have	consideration which sets out a clear design	
too often seen evidence to the contrary (and it can confront	vision and expectations for the Borough.	
them on a daily basis). If a new environment is created in	The Design SPD will supplement both	
which good design is really seen to matter to planning	national and local plan policy to achieve well	
authorities, a more welcoming attitude to development	designed places within the Borough.	
schemes could and should emerge. Belief that people in		
power do care about a community's appearance and history could work wonders.		
Could work worlders.	11 Comments noted and support welcomed	No
11 The Droft Burning Congress Supplementary Diagrams	11-Comments noted and support welcomed	No
11-The Draft Runnymede Design Supplementary Planning		
Document encourages us to think positively about the		
borough's future in design terms, and to believe that		

mistakes made since the second world war will not be repeated. We like its broad theme and much of the detail. In short we applaud it, but we wish to make the following observations on it: 12- This isn't a planning point at all, but in paragraph A2.1 of the document it is stated that the Magna Carta was "signed" by King John in 1215. Actually it wasn't signed; it was sealed. Not least in Egham there are people who care about this.	12-Agreed. To be corrected.	Yes
13-Runnymede's "aspirations" (A2.4) look good.	13-Support welcomed	No
14-We very much welcome the emphasis placed on "community involvement" in the A3.1 section on "influences on good design".	14-Support welcomed	No
15-Design Standard 1 - "Strengthening Runnymede's character". Obviously, we support this. (How could we not?)	15-Support welcomed	No
16-Design Standard 2 - We like the sound of "making people-friendly places".	16-Support welcomed	No
17-Design Standard 3 - "Placemaking and creating character". We agree with much of what is stated here, but we are somewhat troubled by the following sentence: "On large sites, or where the proposed density is likely to be very different to its context, it may be more appropriate to create a distinctive identity" Rather a lot of elaboration is needed here to make it clearer what this could lead to. Is there not a danger of contradicting Design Standards 5, 6 and 7 on "responding positively" to a site, its character and local history?	17-Comments noted. Design standard 3 recognises that on some sites (including larger sites) there may be scope for increased densities and an opportunity to create a new character with its own distinctive identity. Design standard 3 however makes it clear that development should still relate well with its local context. Design standard 3 also continues by explaining that'in understanding and knowing place, development can respond positively, creating new character through	No

	the approach to development and through the application of design principles from the strategic to the detailed scale'. The Design SPD should therefore be read as a whole. National policy and Local Plan policy seek to ensure the efficient use of land which may result in development at a higher density. A clear understanding of the local context and policy within this SPD will help create a proposal which respects and enhances the existing character.	
18-Design Standard 4 - "Achieving sustainable design". We support this.	18-Support welcomed	No
19-Design Standards 5, 6 and 7 - We also agree with these.	19-Support welcomed	No
20-Design Standard 8 - "Creating a vision". We like this, notwithstanding the reference to the possibility of developing at a higher density.	20-Support welcomed. As outlined above, it is acknowledged that some sites may result in increased densities and this needs to be carefully considered in light of the design standards in the Design SPD.	No
21-Design Standard 9 - "Developing a masterplan or site strategy". We approve of this too - and especially with the statement that "Runnymede is keen to ensure that sites come forward comprehensively and not in an ad hoc or unplanned way".	21-Support welcomed.	No
22-Design Standard 10 - "Making good connections". This sounds good, and we very much approve of promoting walking, cycling and good public transport links.	22-Support welcomed	No
	23-Support welcomed	No

23-Design Standard 11 - "Creating a permeable and legible structure". We agree that streets should vary in development schemes to reflect their different roles and that, generally speaking, there should be a block structure to new development in which fronts relate to other fronts and backs relate to other backs. 24-Design Standard 12 - "Plot rhythm". The reference to "intensification" in this causes some concern.	24-National policy and Local Plan policy seek to ensure the efficient use of land which may result in development at a higher density on sites within the borough. The Design Guide is therefore seeking to cover all types of development which may come forward in the future and set out the key design considerations. It is therefore considered important to include a case study on 'intensification'. This section of the	No
25- Design Standard 13 - "Built form and roofscape". We agree that it is important to have "coherent" building lines. It is stated here that "cars should be accommodated in terms of both movement and parking". Really? We were under the impression that development schemes are more likely to win favour these days if they don't accommodate cars or do so only partially. How does this ambition comply with this country's commitments to control and reduce	Design SPD makes it clear that this type of development can have a negative impact if not handled sensitively and thoughtfully. 25-Comments noted. Wording to be amended as follows: "Cars should be accommodated in terms of both movement and parking, as far as is consistent with national and local policy and the Council's adopted parking standards. Cars should not however be allowed to dominate the layout or streetscene (Standard 23)".	Yes
carbon emissions? 26-It is also stated with reference to roofscape that the design of it should "positively contribute to street views and	26-Noted. See response to point 5.	No

the wider skyline". How does the Gateway West		
development in Egham score when set against this criterion?		
	27-Noted. See response to point 5.	No
27-Design Standard 14 - "Using building heights positively". We shall repeat the question just asked about Gateway West.		
	28-Support welcomed.	No
28-Design Standard 15 - "Designing good buildings". We agree that it is desirable to seek a combination of consistency and variety.		
•	29-Noted. See response to point 5.	No
29-Design Standard 16 - "Using landmarks, gateways, focal points and corners to create variety". A very good objective - and one that has been very badly missed in the case of 40-44 Egham High Street.		
	30-Comments noted. The Design Guide	No
30-Design Standard 17 - "Patterns of activity". It has become rapidly more evident - as a consequence of the growth of online shopping and the advent of the Covid-19 crisis - that town centres must have a mixture of uses if they are to thrive and, indeed, survive.	supports a mix of uses to strengthen Town Centres.	
,	31-Support welcomed	No
31-Design Standard 18 - "Reinforcing landscape character and diversity". We agree.		
	32-Support welcomed	No
32-Design Standard 19 - "Settlement edges". This also makes good reading.		
	33-Support welcomed	No
33-Design Standard 20 - "Providing and managing		
recreational open space and landscape". A round of applause for this. To our thinking, the statement that		
"recreational open space should be incorporated into major		
development proposals" is highly laudable.		
	34-Support welcomed	No

	34-Design Standard 21 - "Space between buildings". An important consideration.		
	•	35-Support welcomed	No
	35-Design Standard 22 - "Protecting and enhancing ecology and biodiversity". Good. Obviously 'on the side of the angels'.		
	36-Design Standard 23 - "Providing for vehicle and cycle parking". It is stated here that the provision of "parking for cars in residential development should aim to accommodate car ownership in a manner that is compatible with local character", and that cars should not "dominate the street scene". But in many streets in Egham cars do dominate the scene. As we all know, there are wider considerations too in seeking to manage car movements and parking. This design standard looks for a reasonable balance. It is easier said than achieved, but it is clearly right in our view to push	36-Comments noted. The Council is in the process of producing updated Vehicular and Cycle Parking Guidance for the Borough which will provide further information to complement Design Standard 23. It is intended that this document will be subject to public consultation during the course of 2022.	No
	in this direction.	37-Comments noted.	No
	37-As is also stated here, town centres offer more opportunities to travel by means other than cars, and we welcome the greater emphasis being placed today on cycle parking.		
		38-Comments noted.	No
1	38-Design Standard 24 - "Ensuring residential amenity". It is indeed essential that all new homes are provided with high quality internal and external space. An increasing worry from the pressure for planning liberalisation is that we have started to build a new generation of slums. If this is done by design it will be all the more unforgivable.		
.	20 Decign Standard 25 "Domambaring forgetten"	39-Support welcomed	No
	39-Design Standard 25 - "Remembering 'forgotten' elements". It is indeed important to keep the design of bins, letter-boxes, gutters, satellite dishes etc in mind. It does		

	affect our perception of the quality of our neighbourhood and our lives. 40-To reiterate: We give a warm welcome to this document. It should have come sooner, but much better late than never. It should have a very beneficial impact on our borough.	40-Support welcomed	No
	41-One final point: The Government's planning reform White Paper proposes that each planning authority should have a chief officer for design. We look forward to the acceptance and implementation of that idea in Runnymede.	41-Comments noted. The Council is currently awaiting further steer from the Government in terms of which of the proposals set out in the White Paper will be taken forwards and when. Should the Government proceed with this proposal then the Council will seek to comply with the requirement.	No
Sports England	1-Health and wellbeing – Active Design I note that the SPD includes reference to active and engaged communities; this is welcomed. I also note that it states that new and existing streets need to be easy to navigate, safe and comfortable to use, equitable for all modes of transport but with priority given to active travel and this is fully supported by Sport England. It is clear that this document aims to support a healthy lifestyle through design. Sport England believes these aims would be further strengthened by specifically referencing Sport England's Active Design Guidance, with the recommendation that future design proposals follow its principles. Sport England and Public Health England have refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into	1-Support for approach welcomed. Comments noted regarding the Active Design guidance. Two references to this guidance have now been included within the SPD in Design Standard 2 – Making people friendly places and Design Standard 20 – Providing and managing recreational open space and landscape. The document has now also been referenced in the glossary and the web link provided.	Yes

policy and any new developments – please see website extract and link below:

Active design

We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.

Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.

That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.

Ten principles

The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.

The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.

The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.

	Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.		
Environment Agency	1-We have the following comments to make on Appendix 4: Householder Guidance for extensions and alterations with regard to the section on Walls and Fences. We recommend that flooding should be a consideration: Walls and fences can have a significant impact on the flow and storage of flood water, especially if they are constructed across a flood flow route. This can lead to higher levels of flood water on the upstream side which will potentially increase the flood risk to nearby areas. Therefore, all new walls and fences should be permeable to flood water. Walls should have openings below the 1% annual probability (1 in 100 year) plus an appropriate allowance for climate change flood level to allow the movement of flood water. The openings should be at least 1 metre wide by the depth of flooding and there should be one opening in every 5-metre length of wall.	1-Comments noted. Additional text agreed to be included following discussions with the Environment Agency following the close of the consultation. The following text is to be added in Appendix 4: Householder Guidance for extensions and alterations (section of walls and fences): Walls and fences can have a significant impact on the flow and storage of flood water. This can lead to higher levels of flood water on the upstream side which will potentially increase the flood risk to nearby areas. For planning applications submitted in Flood Zone 3 (1% or greater probability of river flooding), where the Environment Agency are consulted, there would be a requirement to assess and apply an appropriate allowance for climate change. Therefore, any new walls and fencing within the 1% annual probability flood with an appropriate allowance for climate change should be permeable to flood water. Walls should have openings below the 1% annual probability (1 in 100 year) plus an appropriate allowance for climate change flood level to allow the movement of flood water. The openings should be at least 1 metre wide by the depth of flooding and there should be one opening in every 5-metre length of wall.	Yes

		A reference to appendix 4 and how walls and fences should be designed in flood zone 3 is also included in Design Standards 21: Designing the space between buildings	
Natural England	1-While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:	1 Comments noted	No
	2-Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; '. The Planning Practice Guidance on Green Infrastructure provides more detail on this. Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.	2/3/4/5 Comments noted. The Design SPD does include Design Standard 18: Reinforcing landscape character and biodiversity and Design Standard 22: Protecting and enhancing ecology and biodiversity. However more detailed consideration will be given to Green and Blue Infrastructure, landscaping and biodiversity enhancements within the Council's Green and Blue Infrastructure SPD which is currently being prepared. Officers have added a reference within Design Standard 18 and Design Standard 22 to the Blue and Green Infrastructure SPD (G&BI SPD) being prepared. Natural England will be consulted when the G&BI SPD document is open for public consultation, but in the meantime the detailed comments made have been passed to the Council's lead officer who is preparing	Yes

There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:

- green roof systems and roof gardens;
- green walls to provide insulation or shading and cooling;
- new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).

You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".

3-Biodiversity enhancement

This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.

4-Landscape enhancement

The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for

the G&BI SPD for consideration in the preparation of this document.

example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.

5-Other design considerations

The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).

6-Strategic Environmental Assessment/Habitats Regulations Assessment

An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation

Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. 6 Comments noted. The Council undertook a Strategic Environmental Assessment/Habitats Regulations Assessment screening which Natural England responded to. Natural England confirmed at this time that neither a full appropriate assessment nor an SEA were required.

No

	Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again		
Surrey County Council	Heritage 1-Surrey County Council are the lead authority for heritage matters in the county. Although the level of design advice provided throughout the document is good, there is very	1-Comments noted. The Design SPD does provide character areas of the borough within Appendix 2.	No
	little mention within the Design Standards (beyond 'Design Standard 7: Respond Positively to Local History') relating to the specific character of Runnymede or its settlements. We would like to see the document go further by encouraging development that was genuinely characteristic of the area, as opposed to merely 'nice' or acceptable development. The document also does not give any reference to the recent 'Building Better, Building Beautiful' report which is a clear	1-The Design SPD is not intended to provide specific details of the character of settlements across the Borough as space is intentionally being left for Neighbourhood Plans to come forward in the Borough and provide this more finely grained level of detail. At the time of writing, there are 4	No

driver behind the recent planning reforms, whilst aiming to embed beautiful placemaking into our planning system and introduce locally-led design standards.	designated Neighbourhood Areas in Runnymede which account for approximately 46% of the Borough's area.	
	1-The SPD is intended to provide a workable framework (including design standards) to ensure high quality design across the Borough. The Design SPD places a strong emphasis on the design process and the importance of analysing the site and its context. This will encourage new development that is characteristic of its local surrounding area.	No
	1-Officers have included a reference to the 'Living with Beauty' document produced by the Building Better, Building Beautiful Commission in Design standard 1 and have included a link to the document in the glossary.	Yes
2-In terms of specific considerations, although 'Design Standard 15: Designing Good Buildings' does state that 'building design should relate positively to local character' and suggests generic characteristics to emulate, the SPD document does not include a local materials palette which we would consider to be an essential requirement for local design distinctiveness guidelines.	2-Agree that reference should be made to the benefits of providing details of a local materials palette. Include reference to this within Design Standard 15: Designing Good Buildings. Add new sentence at the end of the 4 th paragraph on page 38 as follows:	Yes
	particularly where people will be in close contact with a building, i.e. at the entrance. It would be beneficial if applicants as part of their 'Design & Access Statements and/or supporting information could provide details	

	at the planning application stage of local materials and how this has influenced the design of the development.	
3-'Design Standard 19: Addressing Settlement Edges' does provide a generic reference to the importance of views and viewpoints, but a catalogue of examples of protected views within Runnymede that the council has identified as significant should be provided. We would also expect to see a similar approach taken for the conservation of heritage trees.	3-Appendix 3 includes details of key views within local town centres. The Runnymede 2030 Local Plan does not designate any 'protected views' or make reference to any significant views within the Borough. 3-Design standard 5: Respond positively to the site - focuses upon the importance of an early analysis of the site to consider its existing characteristics which includes important views, urban design features, landscape and focal points.	No
4-Although archaeology is very briefly alluded to, this should be covered in far greater detail within the SPD document. We would welcome a commitment to incorporating archaeological discoveries into development through art installations and creative design elements – Runnymede is one of the county's richer prehistoric landscapes which	4- Design Standard 7: Respond Positively to Local History' – reference has now been included to Surrey's Historic Environment Record (HER) and Surrey Historic Landscape Characterisation Data (HLC)	Yes
should be celebrated. We suggest as a minimum that Surrey's Historic Environment Record (HER) should be listed as a source in 'Design Standard 7: Respond Positively to Local History', whilst reference to Surrey Historic Landscape Characterisation (HLC) data would also be useful.	4-The Glossary at the back of the document already confirms what is meant by the term heritage asset. The definition includes reference to archaeological remains and ancient monuments. Design standard 7 then confirms that heritage assets that could directly or indirectly be affected by development proposals should be identified by applicants, and confirms that where heritage assets may be affected by	Yes
	development, applicants should assess their	

	significance at an early stage and make sure the findings feed into the design concept and design proposals. A reference to the fact that design solutions could incorporate art installations or creative design elements has however been added. 4-Additional text has also been incorporated	Yes
	into Design Standard 7 to confirm that, 'Runnymede is one of the county's richer prehistoric landscapes which should be celebrated'.	165
5-Our only other comment would be to say that there are sections that repeat national guidance (e.g. Appendix 4) which could be removed in order to create a shorter and more concise document.	5-Comments noted but no change proposed. For example-appendix 4-Householder Guidance is considered essential to provide additional guidance to applicants when designing householder schemes.	No
Climate Change 6-Our climate change team are pleased to see reference to designing roofs and roofscapes to take advantage of solar energy, form part of the wider water management system and include green roofs where possible. The inclusion of cycle parking and EV infrastructure within 'Design Standard 23: Providing for Vehicle and Cycle Parking' is also welcomed.	6-Comments noted and support welcomed.	No
7-'Design Standard 15: Designing Good Buildings' does state that the quality of building materials is important, however, this should be supplemented with a recommendation for the use of more environmentally	7-Design Standard 4- Achieving sustainable design considers the importance of minimising waste at the construction stage, using materials and construction methods that are sustainable or renewable.	No

	sustainable materials to be used, such as timber. In addition, the consideration of whole life-cycle carbon emissions of a building over its entire lifetime within the SPD document would provide a more accurate picture of a building's impact on our environment. 8-We would also like to see decarbonised heating, such as district heat networks and heat pumps, mentioned within the SPD document. The fabric used to construct buildings is key in determining building's suitability for heat pumps and therefore should be included within a design guide.	8-The Council is currently scoping a climate change strategy and these recommendations will be considered as part of this work and fed into the Local Plan review.	No
Private individual (late rep)	1.The document is confused in that it is titled as 'GUIDANCE' yet then lists 25 'STANDARDS' which then incorporate 4 Primary Standards separated into 4 further subcategories and in turn 20 further Design Standards. This is very confusing and leads to a lack of understanding. There are clearly defined standards such as minimum 'back-to-back dwelling dimension of 22 meters and 'close boarded fences will not be acceptable where clearly visible within the street scene'. However many of the 'Standards' are not specific in their definition. Users of this document have a need for clear differentiation between Standards which must be met and general Guidance setting out aspirations which may be desirable but not mandatory.	1.The Government's Planning Practice Guidance states that supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. Include the following additional wording on page 4 A1.2 Purpose of this Guide. This document provides design guidance for applicants making development proposals in the borough of Runnymede. Whilst the information within this document is a material planning consideration in the determination of planning applications and an important tool in raising design standards, it should be remembered that the role of SPD is to provide guidance and	Yes

advice on policies in the adopted Local Plan, not to introduce new policy into the Development Plan. The purpose of the SPD is to help support improvements in the design of new development and it is not intended to provide a mandatory set of requirements which must be complied with rigidly in all instances. Individual planning applications will be considered on their own merits in relation to the specific circumstances of the specific site and its context. 2. The SPD which has been produced No 2. The document contains voluminous recital of basic seeks to be accessible to different users of statements and observations such as 'detached dwellings the planning system including people with tend to suit a larger plot', and 'all proposals for taller very little knowledge so that they are able to buildings must be of the highest quality" (shouldn't all understand the document. The document proposals?) that are obvious even to lay people and seeks to limit jargon as far as possible and condescending to the experience and knowledge of seeks to cover a wide range of design professional development designers and implementers. This related topics which are considered relevant detracts from the sound content lost in the volume of the for the borough. document and its credibility. 3.On adoption of the Design SPD, the 2009 No 3. This Design Guidance document follows the 'Urban Urban Character Appraisal will be formally superseded and no longer relied upon by Character Appraisal' document of September 2009. Much of this is still relevant today, particularly its references to the Council for decision taking purposes. As Government Guidance PPS1, PPS3 and PPG15. Whilst the noted, the SPD seeks to follow on from this 2009 document but update it to more PPGs are dated, the fundamental repetitive message which is still totally valid today is that development should accurately reflect current Government policy recognise, maintain, and enhance local character. There are and guidance, including the NPPF and specific broad references to the character types in National Design Codes. Appendix 2 of the Ottershaw in the Urban Character Document. A more SPD (page 59) Character Types and Guidance seeks to characterise the key granular assessment (including photographic examples) of features of the built- up areas within the

Borough defining them into different the character and environment of Ottershaw Village is required (a potential task of the Neighbourhood Plan). character types. This character assessment is broad and identifies the typical characteristics of each area and is not intended to provide a detailed character analysis for all individual areas within the Borough. The SPD guidance provides a series of standards to help improve design quality within the Borough, including providing more detailed guidance in analysing the site and context when considering the design of new development. This approach will provide an opportunity for neighbourhood plans to come forward for specific areas of the borough to provide a more detailed layer of locally specific design quidance. 4. Much of the Guidance relates to the Masterplanning and 4. Whilst definitions in the guidance may No design of large-scale schemes (in excess of 1000 dwellings differ from those used by the development and associated other land uses such as employment, industry, it is considered that the SPD is educational, etc). RBC define 'large' developments as being clear in terms of what the Council defines as 10 or more dwellings. In land development industry terms a large development for the purpose of schemes of 20 dwellings or less are 'small' and 21 to 200+ applying the guidance. The guidance has are 'medium size'. Small and Medium sized developments been prepared to respond to developments do not usually have the scale to incorporate much of the of different types and scale from guidance given in the document. The only 'large' scale householder schemes to housing schemes development demanding Masterplanning is Longcross, of 10 or more, to new settlements. where most of the Guidance principles have and are being applied. This is a stand-alone new village development not being a part of an existing 'character' settlement, with a 'blank canvass' to originate Master planning design upon. It is recommended that RBC Guidance should be focussed on the Small and Medium scale schemes which are most

	ommon as part of existing settlements with their existing character and Features.		
M th	. The Draft Design Guide is dated October 2020. At end larch 2021 it has not been completed or adopted. Does his Design Guide and its standards apply to applications ubmitted before its draft date and/or its adoption?	5. The Design Guide will only apply to planning applications determined post its adoption. Adoption is anticipated in June 2021.	No
ac G th im ac De	The Design SPD is produced some 2 years after the doption of 2030 Local Plan. It contains Standards and suidance which are intended to be applied as relevant to be design of development schemes by applicants. Such apportant Design criteria should have been developed in dvance of or alongside the Local Plan to ensure that the design criteria are applied specifically to each allocated site is relevant.	6. The Runnymede 2030 Local Plan was only adopted in July 2020, less than 1 year ago at the time of responding to this comment. The SPD was developed alongside the preparation of the Local Plan however adoption was not considered possible until after the adoption of the Local Plan given that the role of SPDs is to build upon and provide more detailed advice or guidance on policies in an adopted local plan.	No
co th Ea dv as	The timing of its production appears to be totally in onflict with the Local Plan allocations for development and ne criteria set out for those sites. E.g., Site SL12 Ottershaw ast is required to accommodate 'a minimum of 200 wellings. The SPD Design Standards and Guidance, and spirations simply cannot be fulfilled on SL12 with the ensity implications that at least 200 dwellings impose.	7.Disagree. It must be remembered that the Design SPD is not setting new policy. It is seeking to build on and provide more detailed advice or guidance on policies in the Runnymede 2030 Local Plan.	No
pl: 'S th	. The Design Guide is following the Local Plan. This is lacing the 'cart before the horse'. Many of the design Standards' or 'Guidance' should have been incorporated in the LP document and the site consideration and appraisal in the selection.	8.Please see response to point 6 above.	No

9. The 'Purpose of The Guide' states that it provides more certainty about what is considered 'good' design. It states that it will secure the delivery of distinctive and high-quality Design. There is frequent reference throughout the Guide to 'high quality'. There is however no definition of high quality nor the parameters by which this is judged or determined.	9. Disagree. The purpose of the SPD is to provide design guidance to supplement policies in the Local Plan. The guidance in the SPD provides greater clarity about the process which the Council recommends is followed to ensure that the various elements which contribute to good design are fully considered from the outset of the development process.	No
10. The SPD frequently acknowledges that local character, historic growth, architecture, and local histories require to be respected regarding each site proposals, and that high quality and distinct character with a sense of place are primary aspirations. It notes that 'good design needs to relate to and enhance the particular characteristics and identity of individual villages and towns''should enhance local character and preserve the distinctive identity of a place'. 'All proposals must respond positively to the site in its local context'. " in the vicinity of the site', 'using traditional materials or details that are locally distinctive'. These are objectives which the vast majority of residents strongly seek. There is much preaching of these desirable attributes with little specific advice on how they can be achieved.	10. Disagree. Please see note 9 above. The guidance within the Design SPD highlights a series of 'design standards' which provide more detailed guidance on how development can be better designed to respond positively to the site, respond positively to local character and respond positively to local history.	No
11. It is encouraging that the document places such considerable emphasis on the production of a Design and Access Statement for each site application. It is therefore expected that this will be thoroughly interrogated by Officers, to ensure maximum adherence to the Design Standards, Guidance, and aspirational text of this SPD, and that the public are given sufficient time to examine the Design and Access statement relative to the Application documents. In view of the complexity and length of the SPD	11. Disagree. Please see point 1 above. As part of the consideration of planning applications, the Development Management team comprehensively review all supporting documentation submitted as part of an individual planning application including the Design and Access Statement. The Development Management team consider	No

Design, determined by RBC, it is unreasonable to expect lay persons to be able to both examine, understand, and seek necessary professional advice within the statutory 6-week consultation period, normally allowed. It is suggested that	whether the specific planning application complies with the policies contained in the adopted Local Plan and also other relevant guidance including the Design SPD which		
the document be simplified significantly and/or the consultation period for representations be extended to enable proper and reasonable consideration and input.	will be a material considerations during the decision making process. As part of the planning application process,		
	neighbour consultations will be undertaken by officers and a period of 28 days will be given for the receipt of comments which is considered to be sufficient and in line with Council policy.		
	Officers do not agree that the Design SPD should be significantly reduced in size as all of the areas covered within the SPD are considered to be important to the design process and will help to support better design within the Borough.		
12. There is voluminous text within the document and the following are just some of the examples and comment upon them. The document is so extensive that to examine every item and provide comment upon is not possible with limited time.	12. Noted	No	
 13. On page 15 under 'Developing Design Concept' the following bullet points should be added to ensure consistency with the text. Local character/density/style Local materials/ architectural details Under 'Detailed design: Quantity, size, and format of parking. 	13. Disagree. These considerations are included within the 4 stages of the design process on page 15 which considers an analysis of the site and its context (Design standards 5 – 7), Site Layout and Master Planning (Design Standards 10-20) and the fourth stage of the process on page 15	No	

	which considers the detailed design (Design standards 21- 25)	
14. Reference is regularly made, including photographs, of the Longcross Village. This is the only major large development, currently or having been produced within Runnymede which is masterplanned to incorporate mixed uses and the desirable features of designed public realm, discreet architectural style within its own largely unconstrained character. The first phase of this achieves much of the intentions contained within the draft SPD, and which has no doubt influenced the drafting of the content. The landscaping, street scenes, architectural style, and enclosures even at the early stages of development appear largely harmonious, and thoughtful in design. The incorporation of significant areas of cedar cladding however is already showing poor performance in its weathering and thus appearance. Whilst addressing use of sustainable materials, this represents a poor life and maintenance expectation, as well as detracting from the 'quality appearance'. Technical durability and practicality are not generally considered in the Guide.	14. Comments are noted regarding Longcross and the use of cedar cladding. Design Standard 15 – Designing good buildings makes reference to the importance of the quality of materials (paragraph 4). The materials for new development will be assessed by individual officers on the basis of the individual site and its local context in combination with guidance in the design SPD.	No
15. Design Standard 9 is devoted to Masterplanning and is largely unlikely to be of relevance to sites within the context of Runnymede, other than occasional exceptional large allocations such as Longcross. It would be more appropriate to produce a separate SPD ON Masterplanning for such exceptional sites requiring applicants to engage with the whole range of strategic Masterplanning consultants to produce such schemes in consultation with the Authority. This would reduce and significantly simplify this document and make understandable and deliverable for most users and sites.	15. Disagree. Design Standard 9 refers to developing a masterplan or a site strategy for smaller sites. The guidance within this design standard is considered to be relevant for all types of development proposals ranging from large site allocations to smaller development sites.	No

16. There is regular reference to sustainable transport and reducing the facility of car usage. Whilst enhancing and encouraging the facility for walking and cycling, particularly in Town Centres, there is little recognition of the rural nature of locations and villages with very little public transport along with a high proportion of older persons, who must rely on vehicular usage. Further dormitory villages such as Ottershaw contain a high proportion of dual working families who commute and deliver children to schools. The incidence of car ownership and use in each household is both necessary and high. 'Social' engineering to seek to deter car ownership will not work and should not be built into blanket Standards and Guidance in such circumstances.	16. The SPD seeks to build upon the policies contained in the adopted Local Plan, in particular policy SD3 in this instance is particularly relevant. This policy seeks to enhance the accessibility and connectivity between people and places by active and sustainable forms of travel. This policy was found to be sound by the independent Government Inspector who examined the Runnymede 2030 Local Plan and is considered to be consistent with national planning policy contained in the NPPF. Please also see comments below regarding parking standards for new development.	No
17. Further, the Parking provisions for new housing is set out in the Local Plan largely in conformity with the 2018 Surrey County Council parking standards document. In dormitory village locations the standards are inadequate and do not reflect car ownership and usage in reality. In addition, the space allowance includes garage space. This is now outmoded in its concept in that a large proportion of garages are used for purposes other than parking vehicles. This is recognised by RBC as Planning Authority in the approval of applications to convert garages to residential accommodation and loss of parking capacity. The standards should be changed to require the parking space standards to exclude garages. New development proposals which show parking spaces in 'tandem' are impractical, inconvenient and cause irregular on street /verge parking. Such parking configuration is a device to increase density by reducing the plot width, but causes the negative effects described. Much evidence of inadequate parking standards and design exists throughout Runnymede and is a major	17.The Council is currently developing a Parking SPD for the Borough. The draft SPD will be subject to public consultation in due course.	No

contributor to illegal parking, constriction of footpaths to pedestrians, and destruction of the 'attractive street scenes' which the SPD Design document espouses. The design document should be changed to recognise and resolve these issues.		
18. Many of the illustrative photographs included are of very large-scale new town or major extensions where contemporary architectural styles were possible, in the absence of any existing settlement character and style. These have no context or place within most Runnymede locations and should be excluded.	18. The photographs included within the SPD of sites outside of the Borough are purely illustrative and used to support the relevant individual sections of the SPD. It is acknowledged that these photographs do not relate specifically to the Borough.	No
19. The street scene on the reverse of page 29, illustrates a bad example of layout design and elevational treatment with a large 3 storey flank gable of brickwork with no articulation or features, exposed as a predominant view. Further it exemplifies inadequate parking provision for probably 3/4-bedroom dwellings and random pavement parking.	19. It is agreed that this image should be removed.	Yes
20. Design Standard 14 commendably in the Guidance states that 'height should not be driven by a need to accommodate housing numbers. It should be further stated that 'height should not be driven by a need to maximise square meterage of floor space'. This is frequently the motive to ignore the existing heights, character, and density of adjoining development. RBC in the allocation of sites in the 2030 Local Plan was blatantly driven to maximise housing numbers by citing 'minimum' unit volumes on many sites, ignoring the extent to which they can be accommodated adhering to both good design principles and the nature of the existing adjoining and local character and form.	20. The Local Plan has been the subject of independent examination and all of the policies within the document, including the site allocation policies have been found sound.	No

21. The purpose of providing homes is to accommodate the safe and healthy habitation needs of a volume of people. Providing 'units' of dwellings does not in itself satisfy that need in a reliable ,refined and economical way. It is far more relevant to determine how many people are accommodated by the number of bed spaces or habitable rooms, that each 'unit 'affords. Simply, it is possible to meet the accommodation needs of people by providing bed/habitable rooms in many fewer dwellings, in most non dense urbanised centres.	21. The Local Plan and supplementary planning documents have been prepared in line with Government policy which require the Council to plan for new housing on a per unit basis (for example, para 60 of the NPPF makes reference to the 'minimum number of homes' needed in a local authority area, and the Government's standard methodology for calculating housing needs again uses a formula to identify the 'minimum number of homes' expected to be planned for).	No
22. The very extensive guidance contained is this Guide must be examined in each application made for relevance, and compliance. Do RBC have the staff resource in quantum skills and experience to undertake such extensive and granular analysis and compliance of all relevant applications? Further, do you have the powers to enforce adherence to 'guidance' (as against specific enumerated Standards?) If not, then it is questioned why such voluminous 'Guidance' is given?	22. Please see officer comments in point 1 above.	No
23. Residents will rightly seek to hold RBC to account for every detail stated in the document when making representations on applications. There should be no 'get out' by stating that 'as this is only guidance'.	23. As stated elsewhere in the Council's responses, the role of Supplementary Planning Documents is to build upon and provide more detailed advice or guidance on policies in an adopted local plan. They do not form part of the development plan and cannot introduce new planning policies into the development plan. (Planning Practice Guidance, Paragraph: 008 Reference ID: 61-008-20190315).	No

	Whilst the information within this document is a material planning consideration in the determination of planning applications, this document is guidance to help support improvements in the design of new development and it is not intended to provide a mandatory set of requirements which must be complied with rigidly. Individual planning applications will be considered on their own merits in relation to the specific circumstances of each specific site and its context.	
24. The intention of setting Design Standards is commendable where relevant to development size and location, where they can be objectively assessed and applied. Providing guidance, unless it is mandatory in application, cannot be enforced and leads to wide 'interpretation' disagreement and non-delivery. 'Guidance is no doubt well intentioned toward achieving outcomes, but is often simplistic naivety which destroys credibility, or statements of personal preferences open to wide variance and contrary view. Much of the document is standard 'motherhood and apple pie' applicable across the whole country and not specifically designed and directed at Runnymede and its environment.	24. The Design SPD is not intended to provide detailed planning policies for specific sites within the borough. The purpose of the Design SPD is to provide guidance on how to secure better design across the borough focusing upon the importance of the design process and related design standards.	No
25. Within building and groups of building design and their environment there are very clear objective means of determining what is dominantly regarded as 'pleasing or conversely, offending to the eye'. This does not necessarily lead to a determination of total 'quality', but it goes a very long way to establishing the perception of 'quality and beauty', in the eyes of people generally, who are the constituents of Runnymede	25. The consideration of whether development is 'pleasing or offending to the eye' is considered to be subjective and will be dependent upon an individual's own views, tastes and opinions. The Design SPD provides objective guidance in the form of a detailed framework (including a design process and design standards)	No

	which can be applied to new development across the Borough to secure better design.	
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Runnymede Borough Council (officers in the Planning Policy team) have made a number of minor changes to the document. These are not in response to consultation comments received but are to correct typographical errors, spacing errors and to ensure the completeness and accuracy of the document prior to adoption. The changes made are listed below

Page number	Area where change is required (para number/bullet point/information box for example)	Change made
Inside cover	Under Quality Assurance	The revision history table has been updated
Front cover page, pg2 & bottom of every page	Date	The date on the document ha been changed from Nov 2019 to June 2021 on front page and on the table on page 2. The words 'public consultation' have also been removed. The document footer has been changed throughout the document to state, 'Runnymede Design SPD-adopted June 2021'
3	Cllr Willingales's introduction	New text inserted as follows: I am delighted to see the adoption of this document which is a vital part of the Council's drive to deliver part of the vision contained in the Runnymede 2030 Local Plan; specifically the achievement of a high quality and inclusive built environment through place shaping opportunities across the Borough.
		The Runnymede 2030 Local Plan requires a step change in housing delivery in the Borough over its life time. Runnymede's communities who engaged in both the Local Plan process and the development of this guidance have been clear that they expect the quality of new development to be high, with Runnymede's intrinsic characteristics respected and maintained.

The guide seeks to ensure that developments of all scales and types which come forward in Runnymede complement and build upon the character of the area in which they are located, whether a proposal is for an extension to a family home, a major development for hundreds of homes or a new office building. The guide seeks to provide a valuable toolkit for all applicants as they design their proposals, taking them through the four main stages of the design process.

The Design Guide then defines a set of twelve aspirations for the Borough that have emerged through the production of the guide. The aspirations describe the place that we want Runnymede to be in the future. A series of design standards for Runnymede are provided based on these aspirations, which seek to help deliver distinctive and high quality development across the Borough which is locally responsive and sustainable. The Design Guide also includes a detailed character assessment of the borough to help understand more local design characteristics and includes separate guidance specifically for householder extensions and alterations, as well as the design of gypsy and traveller sites.

We are fortunate to have such a varied and attractive Borough which it is everyone's joint duty to protect and, where possible, enhance. We expect developers to utilise the guidance in this document to design their developments from inception to completion. I look forward to this document flying the flag for good design, so strengthening our resolve to enhance the special characteristics of Runnymede and leaving us better able to resist poorly designed schemes.

		Prior to its adoption, the Design Guide has been through detailed preparation in the form of internal and external workshops and formal consultation. There were a number of very useful consultation responses which have helped the Council prepare this final document and I wish to thank all interested parties for the time and effort that they put into reading the document and contributing to its production. Councillor Myles Willingale, Chairman of the Planning Committee
4	A1.2 Purpose of this guide – Column one, 4 th paragraph	This paragraph has been amended to read This Design Guide was adopted on 30 th June 2021. It draws upon, but now supersedes the Council's Urban Area Character Appraisal (2009) and Householder Guide (2003).
7	A2.2 1st column, 3rd Paragraph, 3rd line	The two reference to 'countryside' have both been changed to 'Green Belt'
7	A2.2 2 nd column, 5 th bullet point	'Institutions in the Countryside' has been amended to 'Institutions within the Green Belt'.
8	last paragraph in first column	New text has been added as follows (as shown underlined), 'Whilst the whole of the rural area is covered by Green Belt, development is still possible in these areas subject to compliance with Green Belt policy contained within the NPPF and the Local Plan'
9	National Policy and Guidance section. New para at end of section	The National Design Guide was originally published by the Government in October 2019 and updated in January 2021. It sets out the characteristics of well-designed places and demonstrates what good design means in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

9	Third column, 3 rd bullet point in list mid way down column	In relation to the IE policies, text amended to read 'IE1 and IE7- IE12'
17	Green box, design standard 12	The words 'site strategy' have been changed to 'Reflecting plot rhythm'.
17	Blue box, design standard 23	The words 'Providing for parking' have been changed to 'Providing for vehicle and cycle parking'.
19	Design Standard 2 – First Column bullet points	An additional bullet has been added to read'access to a network of high quality spaces to provide opportunities for physical activity and interaction with nature'.
19	Design Standard 2 – Part B the Design Standards under Design Standard 2: making People Friendly places on RHS	The bullet point starting 'Safety & convenience' has been changed to read 'Safety and convenience for pedestrians and for people with disabilities'.
19	Design Standard 2. Purple bullet point list at start of text and also in bullet point list on right hand side	An additional bullet point has ben included to readaccess to a network of high quality spaces to provide opportunities for physical activity and interaction with nature.
19	Design Standard 2 – Part B the Design Standards on RHS Under Policies/Refs	Additional policy references added as follows: SL1, EE11, EE12 Active Design (2015) Building for a Healthy Life 2020
20	Design Standard 3: Page title	Spelling from Desing to Design corrected
20	Design Standard 3: Policies & ref Bottom RHS	Policy to SD8 deleted. References to SD7, EE11 and EE12 added
21	Policies and refs box	Reference to policy SD8 addeddddd
23	Design Standard 6: Page Title	Page title changed from Design Standard 6: 'Respond positively to site character' to Design Standard 6: 'Respond positively to local character'.
23	Design Standard 6: 1st Column, 3rd Paragraph, 2nd line	Please remove the word 'urban', so it will read five character types within
24	Design standard 7: Respond Positively to local history – Policies & Refs bottom RHS	Reference to EE9 deleted and references to EE3-EE8 added. Reference to Active Design (2015) also added.

26	Developing a Masterplan or site strategy – First Column bullet points AND bullet points on RHS	An additional bullet point has been added as follows:
		 Consider street networks and public transport routes
28	Design standard 11 – first column bullet points AND bullet points on RHS	An additional bullet point has been added as follows:
		 Integrating tree lined streets.
31	First line of second column	Typo corrected 'Any deign' to 'Any design'
31	Design Standard 12 – Policies/Refs – bottom RHS	Reference to SL19 removed
34	Design Standard 13 – Policies/Refs – bottom RHS	In Policies & Refs reference added to SD8 so list now reads SD7, SD8, EE1
37	Design standard 14, 2 nd column, last para 2 nd line	Amended from 'of a site faces the open countryside, the' to 'of a site faces open Green Belt land, the'
38	Design Standard 15 – Policies/Refs – bottom RHS	In Policies & Refs reference to policy SD8 added so will read SD7, SD8, EE1
38	Design Standard 15: Designing good buildings, first column, fourth paragraph, fourth line	Remove the 's' in the word buildings.
42	Design standard 17, 1 st column, 2 nd paragraph, 4 th line	The word 'been' has been inserted between 'have' and 'established'
42	Design Standard 17: patterns of Activity, Column one, 3 rd bullet point	After the word 'quality' the word 'design' has been added so it reads and high quality design for each
44	Design standard 19, 1 st para, 2 nd line	The word 'countryside' has been changed to 'Green Belt'. This same change has also been made in the 3 rd box down on the RHS (first para, 3 rd line down)
45	Second column, first para after bullet points.	There were 2 full stops at the end of this paragraph. One has now been removed

45	Design Standard 20: providing and Managing recreational open space and landscape – Policies and Refs, bottom RHS	A reference to policy SL28 has been added
48	Design Standard 22 – Policies /Refs Bottom RHS	A reference to the 'Green and Blue Infrastructure SPD' in the policies/refs box has been added
48	Design standard 22, column one, second paragraph	The following words have been added at the end of the second paragraph'Development should comply with national and local policy regarding biodiversity net gain'.
49	1 st para, penultimate line	A comma has been added after electric vehicles
49	RHS, third box down, first para, penultimate line	A comma has been added after electric vehicles
49	Design Standard 23 – Policies/Refs – bottom RHS	please change the reference to the Runnymede Parking Guidance SPD to Runnymede Vehicular and Cycle Parking Guidance SPD
50	Text under Parking Space standards heading.	The first sentence and first part of 2 nd sentence) which reads, 'Parking spaces should have dimensions of 2.4m x 4.8m within new development' has been deleted and replaced with 'Further detail on parking space standards will be provided in the Council's Vehicular and Cycle Parking Guidance SPD. However schemes should provide'.
50	RHS, third box down, first para, penultimate line	A comma has been added after electric vehicles
50	1 st column, under Cycle Parking heading	The text above the bullet points has been amended from, 'Residential development must provide cycle parking. It should be provided within flats and houses without garages and gardens. Cycle parking should be' To: 'Cycle parking should be provided in new development in line with the Council's adopted Vehicular and Cycle Parking Guidance. Cycle parking should be:'

51	Page 51 – Design Standard 24: Ensuring residential amenity.	An additional paragraph has been included after the first paragraph to readThe Covid 19 outbreak has resulted in many people spending more time at home and it is crucial that places we call home are comfortable.
51	Page 51 – Policies/REFS, bottom RHS	A reference to - 'Secured by Design' and Home Security - Part Q of the Building Regulations in box on the RHS at the bottom has been added.
55	Under 'Analysing site an D context heading in first box	A comma has been added in the third line between site and size.
55	Under 'developing a design context' heading, in penultimate box	A comma has been added between services and open (one line up from end of text)
57	Pre application advice section, 1 st column, 2 nd paragraph	In the second line the word 'start' has been changed to starting'.
57	2 nd column under Design and Access Statements heading	In the 2 nd bullet point, in the fifth line the capital letter from the word Houses has been removed. In this same bullet point, in the next line, please amend the 2 in m2 to m ²
59	Bullet points under character heading in first column	A semi colon has been added at the end of bullet point 6
59	2 nd column under heading 1b Chertsey Revitalisation Area	In the opening para-a full stop has been added at the end of the sentence.
		Then in first bullet point under character heading, in the second line, a comma has been added between roads and geometric.
60	1 st column, first para, first line	The word 'urban' has been removed
62	Second column	The title at top of the column has been changed from 'Local Centres' to 'Local Centres and notable shopping parades'
63	1 st column, 3 rd bullet point under character heading	The word 'a' has been deleted from the second line.
63	Grey box titled Wentworth Estates, second paragraph, first line	A 'the' has been added between 'to' and 'urban'

64	Heading for 5.	The word 'countryside' has been changed to 'Green Belt'
64	Third column, bullet point list under Within the Green Belt (edge of settlement) heading	Text amended: RHU to RHUL in first bullet point. Text amended: P&G to Rusham Park in second bullet point Text amended: Homewood Park to Hillswood Business Park in fifth bullet point Text amended: St George's to St George's College in sixth bullet point The seventh bullet point has been deleted
67	Key for map tile 3	'21st Century Urban' has been amended to '21st Century'
70	Appendix 3 – second column – fourth paragraph, fourth line	The word 'and' has been changed to be 'an', so it reads town centre, and provides an important landmark
71	First paragraph	The text has been amended from 'The Local Plan identifies two allocations at Gateway East (IE9) and Gateway West (IE10) and three opportunity areas (High Street North, Strodes College Lane and Egham Library, all IE11)'. To The Local Plan identifies three allocations at Gateway East (IE9), Gateway West (IE10) and Strodes College Lane (IE11), as well as two opportunity areas (High Street North and Egham Library, under policy IE12). Then the following line has been amended to: There are opportunities through development to: (underlining is new text)
71	5 th bullet in list	An 's' has been added to the word building in the last line.
71	Bottom of bullet point list	The following new bullet point has been added at the end of the existing list: Implement practice and projects recommended by the Conservation Area Appraisal.

72	2 nd column, 2 nd para, last line	The policy reference has been changed from policy IE11to (policy IE12).
72	3 rd column, 2 nd paragraph, 6 th line	The comma after the word 'narrow' has been removed.
72	3 rd column, last para, first line	He reference to 'Pyrcroft Way' has been deleted and replaced with 'Pyrcroft Road/Eastworth Road'
72	3 rd column, 2 nd para, first line	The word Street has been changed to Lane
72	3 rd column, last para, third line	The wording has been ameded from 'access to the town centre It's major barrier' to 'access to the town centre. It is a major barrier'
73	1 st paragraph under heading	The policy reference has been changed from (IE11) to (IE12). Then the following line has been amended to: There are opportunities through development to: (underlining is new text)
73	2 nd bullet point	Pyrcroft Road has been amended to Pyrcroft Road/Eastworth Road
74	3 rd paragraph in first column	The word Travelodge has been amended to Premier Inn in 9 th line down.
74	3 rd column, first para, 2 nd sentence	Text amended from, 'Mixed building types exist to the Aviator Park development, a new office and residential development on the site of the former Plessey factory' to 'Mixed building types exist in the Aviator Park/Bleriot Place area where there is a mix of office and residential development on the site of the former Plessey factory'.
75	3 rd line down	Text amended to: <u>There are</u> opportunities through development to: (underlining is new text)
76	2 nd column, 2 nd bullet point, fourth line	The 's' has been deleted from applications so it reads application
76	3 rd column, first para under Design Principles heading, second line	The word 'the' has been deleted so it reads 'within a single housing plot'.

77	First column, bold text midway down page	Text amended as follows: Extensions should respect the materials, scale, and mass and architectural style of the original building.
77	2 nd column first bullet point	The word material has been changed to materials in the second line.
77	2 nd column, 2 nd bullet, last line	The last sentence has been amended as follows, 'Where they are visible in the streetscene, two storey developments should generally not have flat roofs or alien roof forms'
77	2 nd column, final bullet point	The wording has been amended from, 'as a guide, two-storey rear extensions should not extend beyond a 45 degree line from the centre of the nearest adjoining neighbour's window' to 'as a guide, two-storey rear extensions should not extend beyond a 45 degree line drawn from the centre of the primary or only windows which serve habitable rooms of the adjoining/adjacent dwellinghouse(s). (new text underlined)
77	Bottom image. Text under image	Amend last sentence as follows, 'Where they are visible in the streetscene, two storey developments should generally not have flat roofs'
78	First column, first bullet point	Wording amended from, 'ground floor extensions, as a guide, are acceptable where they do not extend more than 3 metres from the rear of the property or a 60 degree line from the centre of the nearest adjoining neighbour's window, and' to 'ground floor extensions, as a guide, are acceptable where they do not extend more than 3 metres from the rear of the property or a 60 degree line from the centre of the primary or only windows of habitable rooms serving the adjoining/adjacent dwellinghouse(s), and' (new text underlined)
80	First column, second bullet point, line 3, and then last line	In line 3, the comma has been moved from after 'general' to after 'terms' so it reads: In general terms, where In the last line one of the full stops after the last word has been deleted.

81	1 st column, fourth para, last sentence	The last sentence has been deleted which reads 'On-going maintenance and effective management is also essential' and replaced with 'Consideration should be given as to how effective management and maintenance can be achieved in the long term'.
81	Bullet point 4, 3 rd line	The text has been amended from 'each pitch, based on trailers' to 'each pitch/plot, based on trailers'
81	Bullet point 6	The existing wording has been replaced with: Maximising opportunities for natural surveillance;
81	2 nd column	A new bullet point has been added as follows: Incorporation of green infrastructure including boundary hedging, soft landscaping and green space where appropriate
81	Bullets point 7 and 8	These 2 bullet points have been merged so it reads: a communal play area for children and potentially a building to house communal facilities may be appropriate for larger proposals for pitches/plots. In such cases there should be a clear delineation of public communal areas and private space, with boundaries to each pitch.
81	Last para in second column (which goes over into 3 rd column)	This text has been retained but relocated so it becomes fifth para at the end of the 1 st column.
81	3 rd column 3 rd bullet point.	This bullet point has been added to list of bullet points in column 2 so it becomes the 3 rd bullet point down in column 2.
81	Appendix 5, column 3.	The wording from 'Individual pitches/plots require' has been amended as follows: As a guide, individual pitches are generally expected to be in the region of 450-500sqm, whilst the Showmen's Guild recommends plots should have an area of at least ¼ acre. Individual pitches/plots should be large enough to accommodate the following as a minimum: ■ adequate space for car parking (and storage of equipment in the case of a Showmen's plot);

		 pitch boundary treatment which respects and enhances existing character; space for a mobile home and touring caravan; an area of private amenity space capable of accommodating activities such as outdoor play, drying clothes and storage; an attractive hard standing area suitable for use by trailers, touring caravans or other vehicles and which takes account of sustainable drainage; and an amenity building to provide as a minimum water and electricity supply, toilet, personal washing and laundry facilities. Please note that the text in italics was existing text but which has been relocated.
84	Glossary, 1 st Column, 4 th Paragraph, under Affordable Housing	Paragraph amended to read Housing which should meet the needs of eligible households, determined with regards to local incomes and house prices. Affordable housing includes social and affordable rented and other forms of affordable housing provided for specified eligible households whose needs are not met by the market (see policy SL20 of the 2030 Local Plan).
84	Glossary, Amenity section, 4 th line	A comma has been added after the word privacy.
85	Glossary, Climate change	Last sentence removed which relates to the Code for Sustainable Homes.
85	Glossary, Countryside	Entry removed from the glossary.
85	Glossary, 3 rd column, Enclosure, 2 nd line	A comma after the word space has been added.
86	Glossary, Gypsy/traveller	The words (definition for planning purposes) have been added after the title and then the words 'or permanently' have been deleted from the 6 th line of the description

86	Glossary – Habitable Rooms	Wording amended as follows:
		Any room used or intended to be used for sleeping, living or eating and cooking purposes. Enclosed spaces such as bath or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition as are smaller kitchens primarily used for cooking only. Large kitchen dining rooms (usually larger than 14m2) with a clearly defined dining space may be counted as a habitable room depending on circumstances.
87	Glossary, Heritage asset, 8th line	Text added as follows please: (including local listing) and then add then remove the word 'listed' at the end of this line and replace with the word 'nationally'
87	Glossary, Local Plan, last 2 lines	The word 2030 has been moved from the last word to between 'Runnymede' and 'Local' so it reads Runnymede 2030 Local Plan.
88	Glossary, Natural Surveillance, first line	The word 'to' has been changed to 'of'
90	Glossary, spatial strategy, 8th line	The word 'and' has been removed and a comma has been added in its place
90	Glossary, spatial strategy, 9 th line	After the word 'these' the words 'and at Longcross Garden Village' have been added
91	Glossary Traveller or Gypsy	This entry has been deleted (repetition with previous entry)
91	Glossary, Traveling Showpeople	The word (definition for planning purposes) have been added after title and then the words 'or permanently' have been deleted from the 9 th line of the description