

Reg 14- Runnymede Borough Council Responses

Location	Summary	Response	Action
Challenges p14	Consider improving clarity under 'Opportunities' about which RHUL site is being referred to – suggest amending the sentence to: "...and some increased development on previously developed land at Cooper's Hill Lane (Kingswood Halls of Residence), owned by Royal Holloway University London (RHUL) in accordance with their own Estates Plan".	Agreed	NP changed
p15-16	Policy SD1 of the Local Plan sets out the quantum and spatial distribution of objectively assessed development needs and requirements over the plan period, ending in 2030. During the course of the Plan preparation, the Council made the decision to reduce the Plan period so that instead of ending in 2035, the Plan period now ends in 2030. Shortening the Plan period had various advantages, described in detail on p28 of the Local Plan. The Council has subsequently commenced a review of the Local Plan to plan for at least 15-years from the date of its adoption. The draft Englefield Green Village Neighbourhood Plan (EGV NP) presents a vision and aims to shape new development to 2035. However, the EGV NP does not contain policies and allocations to meet its identified housing requirement between 2030-2035. The Forum should consider changing the plan period to correspond with the Runnymede 2030 Local Plan period, which guides development to 2030. The draft EGV NP covers the period 2022-2035 and it therefore extends beyond the time period in the 2030 Runnymede Local Plan by five years. The EGV NP does not refer to this or identify any additional development which would be delivered to meet housing and employment needs over this extended time period to 2035. Amending the time period will enable the EGV NP and Local Plan to neatly operate alongside each other and to be monitored and reviewed on a similar timeframe. The risk of not amending the plan period to align with that of the 2030 Local Plan is that the NP might need to be reviewed shortly after its adoption to ensure conformity with the policies and spatial development strategy of the revised Local Plan (as the more recently adopted planning policy takes precedence).	Agreed, NP period should be 2030 to align with the adopted Local Plan.	Front page and new paragraph 1.2 references 2030
Aim 2	Aim 2 of the EGV NP seeks to respond to housing needs by supporting suitable housing for people of all ages and means. Although paragraph 8.15 states that there is no substantive evidence to suggest there is a specific housing need in the area, there is evidence supporting the Local Plan that there is a range of housing needs that can be accommodated in Englefield Green. It is recommended that if a key aim of the NP is to respond to housing needs, the NP should identify the relevant evidence underpinning these needs – such as the Runnymede-Spelthorne Strategic Housing Market Assessment. Paragraph 7.4 suggests that the NP supports new development that meets the needs of local people. Does the NP support growth which meets the objectively assessed market and affordable housing needs of a wider housing market area than just the Neighbourhood Area	Aim 2 is carefully worded to say that the NP will support suitable housing for people of all ages and means, it does not seek to provide such housing through the NP. Paragraph 7.4 refers to 'local' people, there is no suggestion that 'local' is restricted to the Neighbourhood Area.	No change

p18-19 (Chapter 8)	Paragraph 8.1 defines sustainable development as ‘small scale development’. Whilst the EGV community may prefer small-scale development, the EGV NP cannot resist larger-scale development which accords with up-to-date development plan policies and is thus considered to be sustainable (in accordance with NPPF principles). Consider amending this to ensure the NP provides in-principle support for all new development which comes forward and is assessed to be sustainable. There is a risk that an Inspector may consider the draft NP’s policies and overarching principles come across as failing to promote sustainable development – a Basic Condition that must be met if the NP is to be recommended for Referendum. Paragraph 8.3 describes the Local Plan’s growth plans for Englefield Green. It should be made clear that this quantum of development is over the period 2015-2030 (rather than to 2035 which is the draft EGV NP period). The Forum has included a demographic survey to support the NP and how it might affect the area’s needs for housing. However, the survey makes no reference to the formula, currently used by the Government, to identify the minimum number of houses expected to be planned for in an area. This formula takes account of historic household growth and historic under-supply to give a minimum annual housing need figure for an area. The housing need figures for Runnymede, and its settlement areas, between 2030-2035 and for the new plan period, will be included in evidence produced as part of the Local Plan review.	Para 8.1, 'small' replaced with 'sustainable'. added 'up to 2030' in para 8.3. Noted that housing need figures will be included in evidence produced as part of the Local Plan Review. The Local Plan Review may well act as a trigger for a review of the Neighbourhood Plan (bullet point 4 of paragraph 17.9 of the NP)	Change to Para 8.1 and 8.3
p18-19 (Chapter 8)	Suggest amending paragraph 8.4 to make it clear that a masterplan has been prepared for this site by the Neighbourhood Forum, and to set out how much involvement there was with the landowner/developer of the site in the production of this masterplan. Suggest amending paragraph 8.5 referring the 2021 SLAA to “...a potential redevelopment opportunity located in the Green Belt identified in the Strategic Land Availability Assessment (SLAA) which has been produced to support the review of the Runnymede 2030 Local Plan for around 170 units of housing”. This is because the plan period of 2025-2040 is subject to change. Paragraph 8.7 refers to RBC resisting purpose-built student accommodation unless it complies with criteria contained in policy SL23. In accordance with principles in the NPPF that Local Plans should be prepared positively and with its presumption in favour of sustainable development in mind, policy SD23 does not resist purpose-built student accommodation. Suggest this sentence is amended as follows: “...but RBC state that they will resist the loss of existing, purpose-built student accommodation and will grant proposals for purpose-built student accommodation provided that certain criteria, contained in policy SD23, are met”.	Amended para 8.4 to reference that the masterplan was commissioned for the NP. Despite many attempts to liaise with RHUL, they didn't engage prior to the Regulation 14 consultation. Amended Para 8.5 and 8.7 as suggested	Minor amendments to paras 8.4, 8.5, 8.7

p19	The policy supports the delivery of appropriate, new development within the settlement boundary where there are no adverse impacts. Further clarity would be welcome on the meaning of “impact on existing residential, employment and community uses” – does this refer to the amenities to neighbouring properties and uses? Policy EE1 supports development proposals where they ensure no adverse impacts on the amenities of occupiers of the development proposed or to neighbouring property or uses. Parts of Policy ND1 duplicate requirements in Policy EE1 and do not need to be repeated in the NP. Policy ND1 refers to ‘appropriate new development, including housing...’, but there is no other indication of what other forms of development are to be considered as appropriate. Suggest removing reference to ‘appropriate’ unless supported by further guidance in the text. The second paragraph makes reference to ‘no significant adverse impact’, which is not consistent with the requirement for ‘no adverse impact’ in the first paragraph. The first paragraph of the policy implies that even development proposals with minor impacts would fail to comply. Consider amending this policy to ensure consistency with requirements of Policy EE1 and within the policy itself. Supporting text could also be introduced to stress that proposals will be supported where abatement or mitigation measures to reduce impacts to acceptable levels can be secured and implemented. In some cases, there may be minimal or moderate impacts, but the policy should allow for the full mitigation of those impacts, or the opportunity to reduce them to an acceptable level. Paragraphs 8.10 and 8.11 create the impression that infill development can only take place within the settlement boundary, but limited infill development (and extensions/alterations/replacements) can be considered appropriate on previously development land in the Green Belt in accordance with policy EE17 of the Local Plan and paragraph 149 of the NPPF provided that there would be no greater impact on the openness of the Green Belt than any existing development. Policy ND1 may only apply to development proposals within the settlement boundary, but it is recommended that supporting text is amended to provide clarity that certain forms of development could be considered appropriate beyond the settlement boundary too, with reference to relevant Local Plan and NPPF policies.	Comments and suggestions noted. Whilst there is some similarity with LP Policy EE1, it is important that these requirements are also within the NP. Changes and additions made to explain what types of development may be appropriate including changes made to policy ND1, paras 8.10, 8.11, 8.12 (new)	Changes made to policy ND1, paras 8.10, 8.11, new paragraph inserted at 8.12
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p20	Paragraph 8.14 and the supporting Demographic survey state that it is estimated that only one third of the houses on the Forest Estate consist of social housing directly owned by RBC. RBC's Housing team indicates that significantly more than one third remains in council ownership. GIS data suggests that over half are council-owned. RBC's Housing team can provide a precise figure if required, using the Forum's definition of the extent of the estate (or the Housing team can use its own definition). Paragraph 8.15 suggests there is no substantive evidence to suggest that there is a specific housing need in the Neighbourhood Area. Indicative figures from RBC's Housing team suggest that a significant number of applicants with a priority on the Housing Register have included Englefield Green as a preference area; and a proportion of these are currently social housing tenants. This is one indication that there is a specific housing need in the Area, and that the delivery of affordable housing is important. The Council supports the Government's plans for the delivery of First Homes, but has detailed the Council's approach to First Homes in an Interim Policy Statement (January 2022), which takes into account local circumstances. Suggest Policy ND2 is revised to signpost applicants to this interim statement to provide further clarity about how the requirement will be applied locally. This interim statement may be superseded by further policy revisions and guidance in the revised Local Plan, which will be prepared in accordance with national planning policy requirements regarding the provision of First Homes. In the 'Housing need' section, RBC would expect to see more information about the needs of Englefield Green Village West, which is the thirteenth most deprived ward in Surrey on the Index of Multiple Deprivation. There is limited information within the draft NP about how new, sustainable development in this area will be supported.	Noted, amendment to para 8.14 made to reflect larger proportion of social housing. Amendment to para 8.15 for clarification. Reference to RBC's Interim Policy Statement in policy ND2. There is no reference to Englefield Green Village West in this section as there is no specific policy wording relating to this area.	Changes to Paras 8.14, 8.15 and ND2
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p20-21	Paragraph 8.19 should be updated to indicate that land allocated at Blays House, Blays Lane has been released from the Green Belt through the adoption of the Local Plan (rather than 'will be removed'). There are similar references in the Masterplans document which should also be updated. The EGV NP refers to the site as the 'Wick Road' site, which could cause confusion as the Local Plan refers to it as the 'Blays House, Blays Lane' site. Consistency regarding how this site is referenced would be useful for applicants and decision-makers (in the policy, supporting text and Design Codes and Masterplans document). As identified by the EGV NP, the land at Blays House, Blays Lane has been allocated for development in the Local Plan by Policy SL5. An extensive evidence base supported the preparation of this policy, including a viability assessment and consultation responses from key infrastructure providers and other relevant bodies. The proposed Masterplans document states at p76 that "this masterplan concept represents one way in which the site could come forward, in response to high level site analysis. Applicants will need to prepare full technical appraisals and will be expected to broadly align with the following design principles." Policy ND3 should be amended to reflect the flexibility relayed in this statement in the Masterplan, recognising that there may be alternative, more appropriate ways to deliver development at the site in accordance with the key requirements of Policy SL5. For example, alternative design concepts may come forward based on the outcomes of a detailed Flood Risk Assessment, Travel Plan, Transport Assessment, habitat/species survey and landscaping strategy required by Policy SL5 – in which case, only limited weight can be applied to the EGV NP Masterplan. It will be challenging for development proposals to consider the design vision, concept and principles in both the Masterplans document and the Design Codes – there is a large amount of overlapping guidance, which is very prescriptive in nature. For example, development coming forward on the Blays Lane site will need to take account of very prescriptive guidance in Chapter 5 of the Design Codes document as the site is located in the Urban Area Design Code Zone, but also take account of very prescriptive guidance in Chapter 7 of the Masterplans document. It would be useful to streamline the requirements and make sure they are consistent across the two guidance documents.	Comments noted and references in the NP have been changed to Blays Lane (Wick Road) site. Additional reference to the requirements of SL5 inserted at 8.19, addition to 8.20 explaining that the master plan is a concept. Policy ND3 altered to 'have regard' for the Design Codes. Sections C & D have been removed from the Masterplans document to streamline and ensure consistency.	Changes to 8.19,.8.20 and ND3
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p20-21	The following minor editorial issues in the Masterplans document also need attention: • Page 61 of the Masterplans document is titled 'orientation', but the text does not refer to orientation principles. • Page 68 needs to be updated to make it clear that the site has now been released from the Green Belt upon adoption of the 2030 Local Plan. • Page 76 suggests that all existing trees are to be retained. This requirement goes beyond that of the NPPF (paragraph 131) which seeks to ensure that "existing trees are retained wherever possible" and that of Policy EE11 of the Local Plan which seeks to protect significant trees. The Blays Lane site contains many significant trees and tree belts, and it is reasonable for the Masterplans document to seek to retain these in accordance with Local Plan policies EE11 (Green Infrastructure) and SL25 (Existing Open Space). • The masterplan at p78 suggests that Policy SL5 recommends an extension to Park House. This is incorrect. Policy SL5 (d) seeks to ensure that the Locally Listed Park House and its setting is maintained and enhanced – not that the building is extended. • It is unclear whether the amount of new open space proposed in the Masterplan has been informed by the standards set out in policy SL26 (New Open Space) of the 2030 Local Plan	Alterations have been made to the MasterPlans document including: removal of much of the Design Code information to avoid duplication as requested by RBC; Page 61 (removed); Page 68, unchanged as the explanation regarding green belt is covered on the previous page; Page 76 altered to reference NPPF and LP policy and the need to retain trees wherever possible; page 78 amended for clarity; open space standards are not set out in Policy SL26, however, the text now references the policy.	Changes to Master Plan made
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p21-22	Like Policy ND3, officers have concerns about the flexibility of the wording of the policy. This, combined with the extensive amount of prescriptive guidance in the Masterplans document and the Design Codes, results in Policy ND4 presenting itself in a similar fashion to that of a site allocation requirement, but without the support of the supporting evidence (such as viability assessment around the proposed quantum of development). The Council exercises strict control over development within the Green Belt in accordance with national policy, guidance and Local Plan policies, including Policy EE14 (Extensions and Alterations to and Replacement of Buildings in the Green Belt) and Policy EE17 (Infilling or Redevelopment on Previously Developed Land in the Green Belt). Policy ND4 should be amended to make it clear that even if a development proposal is considered to be acceptable in terms of Masterplan and Design Code principles, proposals will need to comply with the strategic Green Belt policies of the NPPF and 2030 Local Plan. Officers are of the view that implementing the requirements of Policy ND4 will be challenging, as the Masterplans and Design Codes documents do not appear to have sufficiently accounted for the strict controls of strategic policies in assessing development in the Green Belt. The site falls within the 'Green Belt Design Code Zone'. The Design Codes for this zone have been developed (according to p20) to present the conditions that new property developments within the area should respond to, as part of the redevelopment of large higher-end estates within the Green Belt surrounding the Urban Area. Policy ND4 requires the development proposals at the Coopers Hill site to accord with Design Code principles, but this will be difficult to achieve as the type of development being promoted at the site does not involve the redevelopment of mansions/manorial estates for the high-end residential sector. This would mean proposals have to accord with conflicting requirements in the Design Code and Masterplans document.	ND4 has been changed with the addition of a sentence to explain that any schemes will be subject to national and local GB policies. Insertion of 'have regard to' the Design Codes. The Design Code categories have been changed to avoid this confusion to 'Built up Area' Codes and 'Rural Area' Codes.	Changes to ND4 and Design Code and Masterplans
p21-22	Paragraph 8.23 states that NPs are not able to remove sites from the Green Belt. Paragraph 136 of the NPPF does in fact provide scope for NPs to amend green belt boundaries, as Thorpe did in their NP, and it is recommended that this sentence be deleted.	Part of the sentence at 8.23 removed as requested.	Para 8.23 changed
p21-22	As explained above, the NPPF requires all design codes to be based on effective community engagement, with an opportunity for landowners and developers to contribute to their preparation. It is not clear in the EGV NP or the Masterplans document whether RHUL have been effectively engaged in the preparation of this policy or the masterplanning of its site.	RHUL have been contacted on numerous occasions by the Forum but have declined to comment until the Reg 14 consultation. It is not considered appropriate to refer directly to this within the NP, but the Consultation Statement has information on this issue.	No change

Policy ND5 Para 128 of the NPPF	The supporting text should make it clear that not all types of development proposal will be able to apply all design code principles. Submitting a statement specifically addressing how each design code has been considered is unreasonable – a minor development proposal situated within the Urban Area Design Code Zone would have to demonstrate how around 38 design principles have been considered, not all of which will be relevant for such a development. Where possible, the EGV NP should refer to information which is already required by the 2030 Local Plan as a means to demonstrate compliance. Information submitted should be proportionate to the scale of development proposed. Further comments on the Design Codes document are set out in a separate section below	Agreed, wording added to clarify this at para 8.38 and text added to the Introduction page of the Design Code. The table stipulating the requirement for applications addressing each of the Design Codes has been removed.	Minor amendment to para 8.38
p25-26	Officers support the intentions of the policy which seek to reduce carbon emissions in new development. This is very much in line with objectives in the Council's recently adopted Climate Change Strategy. The policy encourages new development to target zero carbon emissions, which will help achieve national and local carbon reduction targets. However, the Government has set out its intentions to develop a Future Homes and Buildings Standard, and policy requirements to deliver development with zero carbon emissions would go beyond these national standards as well as Local Plan standards in Policies SD7 and SD8. Unless viability evidence is provided to support the inclusion of this policy requirement, consider amending the policy to suggest that zero carbon emissions be targeted where viable and feasible. There is also an important distinction to be made between 'net zero carbon development' and 'net zero operational development' – as per definitions provided by LETI and the UKGBC (as cited in your supporting text). It is recommended that the policy is amended to refer to 'net zero operational emissions' in the absence of a carbon offset policy requirement (without this mechanism, achieving true net zero would be unrealistic). Further clarity is also needed on what forms of development are subject to the requirements. As currently worded, the policy would apply to all types of new development, including change of use and minor development proposals, including householder applications. Incorporation of on-site energy generation technologies may not be feasible or viable in some of these instances. Some of the measures may also conflict with criteria in other NP policies – consider introducing some flexibility into the heritage policies to enable non-authentic materials associated with sustainable construction to be introduced to new development. Officers would find it difficult to assess whether development proposals have met the requirements of this policy. Policy SD8 requires the submission of Energy Statements to demonstrate that standards have been considered. Consider amending the policy to identify the information that applicants should submit in order to demonstrate compliance, aligning this with information requirements of strategic policies in the Local Plan where possible.	Noted, additions made to the policy and an additional paragraph added to the text preceeding Policy ND6.	Amendments to text and Policy ND6

p27-28	Officers are concerned that Chapter 7 of the Design Codes document (referenced at paragraph 9.3, but not within the policy itself) contains statements which are contrary to the principles in the NPPF and the Local Plan regarding how development in the Green Belt should be considered. If development proposals come forward in the Green Belt for older mansions and/or manorial estates, the NPPF (paras 147 – 150) and Local Plan policies (EE14 – EE19 inclusive) are explicit about the controls and consideration that will be applied in considering these proposals. For example, the principle of carefully laying out new buildings and gates to underline the importance of the access to formal, open spaces (p83), whilst important, will need to be a secondary consideration to a layout which minimises harm to the openness of the Green Belt. This should be made clear in the policy, supporting text and the Design Codes document. The proposed policy echoes several principles which are already promoted in Policy EE1 of the 2030 Local Plan, which supports development proposals where they respond well to the natural character of the area and make a positive contribution to the Borough’s landscape setting (including within the Green Belt). This should be demonstrated through a landscape strategy, and Design & Access Statements for major developments. Should the Forum conclude that Policy C1 is to be retained, further clarity should be provided on how development proposals demonstrate that the principles have been achieved, aligning this with information requirements of strategic policies in the Local Plan where possible. As noted above, the principles in the Design Codes document will also be challenging to apply should any development come forward on the Coopers’ Hill site (which is situated in the Green Belt Design Code Zone) as the Masterplans document presents a different approach to that promoted in the Design Codes document	Text added at 9.1 and Policy C1 referencing national and Local Plan GB policies and the need for GB openness to be retained/harm minimised. Additional paragraph added prior to Policy C1 requiring Design and Access Statement to set out how they conform to the Local Plan, Neighbourhood Plan and Design Code principles. The text in the Introduction of the renamed 'Rural Areas' zone emphasises this now. The Design Code document in what is now the ‘rural area’ zone, makes it clear that the principles in that section apply primarily to the large mansions in the area. However, the principles in the ‘rural area’ zone do translate to the layout of Coopers Hill site.	Addition to Policy C1 and additional paragraph.
p27-28	Officers support the Forum’s aims to protect key scenic and distinctive views – similar principles are promoted in Runnymede’s Design SPD and the National Design Guide. Paragraph 9.9 and Policy C2 does not differentiate between different forms of new development which are expected to provide visualisations and plans to demonstrate impacts on designated views. This could potentially be an onerous requirement for householder and minor development schemes. EE5: Conservation Areas EE17: Infilling or Redevelopment on PDL in GB Further guidance would be welcome on what constitutes ‘not be obstructed’. Could the policy be positively worded regarding opportunities for new development to make a positive contribution to the Neighbourhood Area’s views?	Added text to paragraph 9.9 and the policy supporting positive contributions to views. Development would be judged against this policy only in the vicinity of a Special View and a minor proposal, even an extension or fence that requires planning permission could obstruct or impact on a view. It is not therefore considered practical to exclude minor proposals from the application of this policy.	Addition to paragraph 9.9 and Policy C2
p28-29	Suggest amending the first sentence to better align with that of Policy EE5 to “Development within or affecting the setting of a Conservation Area should achieve...”. Officers do not consider this policy to be consistent with paragraph 134 of the NPPF which allows for outstanding or innovative designs which promote high levels of sustainability and can make a positive contribution to local character	Noted, although there is no need to repeat the references to outstanding or innovative design in the policy. Relevant changes made to paras 10.3, 10.5 and HE1.	Changes to paras 10.3, 10.5 and HE1

	and distinctiveness (which is also promoted by Policy ND6 of the draft EGV NP and various design codes). Policy EE3 of the Local Plan seeks to preserve and enhance existing historic fabric and features in Conservation Areas but allows for flexibility in design as long as proposals respect existing local context and character. By stipulating the use of only locally distinctive detailing and authentic materials, Policy HE1 sets out a very precise design philosophy which potentially restricts innovative design and the ability of a decision-maker to form a balanced planning judgement. In most cases, precise design philosophy should not be too closely defined, in recognition that innovative proposals can be integrated with a historic built environment through good design. This is explained well in the National Design Guide (p12). On p30 of the Design Codes document under HO: Housing, innovative design solutions are encouraged, and this is supported. It would be difficult for development proposals to achieve SU. Sustainability design codes if only authentic materials are permitted. The CH. Character design codes are less prescriptive than Policy HE1 and appear to more closely resemble the language of Policy EE5 of the Local Plan, setting out how proposals should pay particular attention to the layout, form, scale, materials and detailing in the area and be in keeping with the character and appearance of the conservation area. Officers are concerned that both a lack of consistency between the policy and the design codes, and with national and Local Plan heritage policies, could cause confusion for applicants and decision-makers. In accordance with the NPPF (para 194), a description of the significance of any heritage asset affected and any contribution made by their setting is required to be provided. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential on their significance. This is explained in Policy EE3 and could be referenced in the supporting text of Policy HE1 to provide clarity.		
p29	Identifying and including a building on a NDHA list means that its conservation as a heritage asset is an objective of the NPPF and a material consideration when determining the outcome of a planning application. The NPPF is clear that these heritage assets should be conserved in a manner EE3: Strategic Heritage Policy EE8: Locally Listed and other Non-Designated Heritage Assets Para 203 of the NPPF appropriate to their significance – for NDHAs a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset (para 203). Officers do not support the exceptional circumstances test introduced by Policy HE2, which effectively makes the 140 or so additional NDHAs in Annex D equivalent to designated heritage assets in terms of significance (e.g. Policy EE4 sets out how the loss of or substantial harm to a designated Listed	Concerns are noted. Reference to the background technical document 'A Survey of Non-Designated Heritage Assets in Englefield Green Forum Area' has been inserted into para 10.7 which explains the process and criteria for designation. It should be noted that all owners of potential NDHA's were contacted prior to their properties being included. Policy HE2 has been amended to align with NPPF wording.	Changes to 10.7 and Policy HE2

	Building would only be permitted in exceptional circumstances). Policy HE2 goes significantly beyond the aims of the NPPF and Local Plan policy, and officers believe it would be unreasonable for this test to be applied across such a large number of NDHAs identified in the draft NP – it would create a significant burden at development management stage. It is suggested that this policy is amended to conform with NPPF and Local Plan principles (para 203 and EE8 respectively) (or that the last sentence of Policy HE2 is deleted as, once amended, it would repeat Local Plan policy). The supporting text should also make reference to the evidence base upon which NDHA decisions were made, which will provide applicants with further guidance about why the asset was considered to be of historical importance. Consultation with our heritage officer suggests that some of these buildings should not qualify as NDHAs. The PPG is clear that only a minority of buildings have enough heritage significance to merit identification as a non-designated heritage asset (Para 039). Many of the buildings on the list date from 1850 to 1945 – because of the greatly increased number of buildings erected and the much larger numbers that have survived during this period, progressively greater selection should have been necessary. Just because a building is old or holds a record on a local Historic Environment Record, does not mean that it should be treated as an NDHA. There is no statutory requirement to consult owners before adding an asset to a local heritage list, but Historic England guidance recognises that the management of NDHAs is easier if it is included on the list with the knowledge of the owner. It goes on to say that “owners should be advised of the intention to locally list an asset, including an explanation of the planning implications, but it is important to put in place a process for handling requests not to designate”. It would be good to get clarity on whether owners have been consulted. It would be helpful if Annex D of the EGV NP could indicate which of the buildings are also located in the Conservation Area, and are therefore already subject to the requirements of strategic heritage policies.		
p30-32	Paragraph 11.6 and Policy NE1 state that all minor/major development proposals are required to follow the three-step approach when preparing applications (except house extensions). This is in line with the Council’s Green and Blue Infrastructure SPD (GBI SPD), except that the SPD excludes the three-step approach for householder applications, not just house extensions. It is suggested that the text in paragraphs 11.6-11.7 can be reduced and made more concise by making reference to (or reflect similar text to) the checklist in Box 4.4 of the SPD, which sets out clear instructions on what should be submitted for various forms of development, and what criteria the submitted information	The natural environment is an important issue for the NP and it is not considered necessary to reduce the text referring to the SPD or the SWT Report commissioned by the Forum. Para 11.8 and Policy NE1 revised for clarity removing the references to biodiversity offsetting which is dealt with in Policy NE2.	Para 11.8 and Policy NE1 changed

must address. The checklist presents a similar list of topics to be addressed by applicants as those listed in paragraph 11.7 of the NP. The SPD also describes how information submitted should be proportionate to the scale of the development proposal, to avoid unnecessary burdens on smaller scale development proposals. The only criteria in the checklist which differs from that in paragraph 11.7 is the percentage of biodiversity net gain (BNG). This should be discussed in the supporting text to Policy NE2, rather than that of Policy NE1. Officers find the various references to green and blue infrastructure and biodiversity net gain offsetting across both policies NE1 and NE2 and their supporting text confusing, and there is a lack of clarity on how these requirements should be implemented at the development management stage effectively. The wording of the first sentence of paragraph 11.8 needs to be reviewed, as it doesn't currently make sense. In addition, paragraphs 11.8-11.9 seem to set policy requirements, but these are not within the policy itself. Any offsetting requirement needs to be accompanied by clear guidance about the mechanisms by which offsetting will be secured (and therefore enforced by DM officers) – the Biodiversity Report does not provide sufficient guidance. Paragraph 11.9 refers to 'RBC's GBI Strategy', but it is a GBI SPD. It also states that Section 106 contributions will be sought to optimise the delivery of biodiversity enhancements and ecosystem services. It is assumed that S106 contributions would only be sought where enhancements cannot be delivered on-site, as planning obligations may only constitute a reason for granting planning permission if they meet three tests: they are necessary to make the development acceptable in planning terms; they are directly related to the development; and they are fairly and reasonably related in scale and kind to the development (para 57 of the NPPF). S106 contributions should therefore only be sought if biodiversity and green and blue infrastructure requirements have not been delivered acceptably on-site. Policy EE11 of the Local Plan already seeks financial contributions towards provision and enhancement of green infrastructure where it is not possible to provide on-site green infrastructure. The text in paragraph 11.8-11.9 (or preferably within a policy itself) could make reference to this, and explain that the Forum's preference is for any contributions to be used to deliver green and blue infrastructure within the Neighbourhood Area where feasible. There would also need to be clarity around the ongoing ownership and/or management and maintenance of on-site and off-site GBI assets (see para 4.5.28 of the GBI SPD). In

addition, the Community Infrastructure Levy (CIL) Regulations allow local areas to choose what infrastructure they need to deliver their plans for growth. A proportion of the CIL receipts for new development are passed to the Neighbourhood Forum (where a Neighbourhood Plan is made), and these funds can be spent on infrastructure, including green and blue infrastructure, for the benefit of the local community. Suggest that policy and supporting text make reference to the possibility of using developer contributions for local green and blue infrastructure projects (or signpost to Policy I1 which addresses this issue). This would give an early steer to RBC on the projects/enhancements that the Forum wishes to spend its neighbourhood levy on. Ringfencing biodiversity offsetting schemes to be delivered within the Area may be challenging as the Environment Act also specifies that BNG can be achieved through buying Biodiversity Credits from the Government towards national projects. Consider amending the policy to set out a hierarchical approach similar to that endorsed by paragraph 4.5.17 of the SPD, namely: on-site BNG first; then off site BNG opportunities/projects in the Neighbourhood Area; and then if this is not feasible as close to the Area boundary as possible; then if this isn't feasible consider Biodiversity Credits. The final sentence of Policy NE1 should encourage rather than require the incorporation of native vegetation, hedgerows and trees for boundary features. It is considered unreasonable that all planning applications for new fences be refused on this basis.

- 11.3 Paragraph 11.13 refers to a significant loss of open space around urban areas within EGV NA. However, open space lost will constitute general open space within development sites i.e. space around buildings and within curtilage, not designated open space. This should be clarified.

Noted, addition of 'undeveloped' to clarify

Change to para 1.3

11.4	Paragraph 11.14 refers to buffer zones, reflecting recommendations made in the Biodiversity Report. Whilst Officers recognise that buffer zones are important, they should be site-specific, depending on the constraints present at each site. For example, Policy SL5 of the 2030 Local Plan – the Blays House allocation – includes a requirement for a green infrastructure buffer to safeguard biodiversity at the Windsor Great Park SNCI, as well as an ecological buffer around the watercourse running along/through the site. Policy EE12 also sets buffer zone requirements - a minimum 8m for main rivers and 5m for ordinary water courses. A blanket 15m buffer for the protection of all statutory and non-statutory designated sites and other important habitats is not considered to be reasonable. Even the underlying Biodiversity Report states that the exact size of a buffer should reflect the habitat being impacted and its location within the landscape (para 5.3.28). Notwithstanding these concerns, the definition of statutory and non-statutory designated sites should be clarified. Rather than setting an arbitrary 15m, officers are of the view that the use of and appropriate extent of undeveloped buffer zones should be considered through ecological assessments and presented in GBI Strategies and masterplans submitted with planning applications (proportionate to the scale and nature of development proposed), as advised in the GBI SPD. Officers also object to this requirement as it would affect the delivery of the site allocation at Blays House, which is located adjacent to Windsor Great Park SAC and it has priority habitat on-site (an allocation which was considered to be acceptable by an Inspector at Examination in Public due to the criteria incorporated into the allocation to safeguard biodiversity). If the Forum is minded to retain this requirement, further clarity would be required on whether the buffer applies to all forms of development (including householder development) or whether there are exceptions; and where the 15m buffer is situated (from the edge of the habitat or from the development site boundary)?	Agreed that clarification is needed, changes have been made to 11.13-11.15 and policy NE2	Changes to paras 11.13-15 and Policy NE2
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NE2	Various Local Plan policies seek net gains in biodiversity, primarily through Policy EE9, with extensive guidance provided in the Green and Blue Infrastructure SPD. The SPD makes it clear that at least 10% BNG should be achieved. The Biodiversity Report supporting the EGV NP indicates that the financial burden to deliver 20% BNG instead of 10% is minimal compared with the additional biodiversity benefits that these would bring, and that a 20% requirement has been set by other local authorities. Officers are sympathetic to these statements, but the NPPF (para 34) and the supporting PPG (para 001) are clear that policy requirements should be informed by evidence of infrastructure need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy and section 106. The Greater Cambridge Local Plan and its policy requirements (cited in the NP evidence base) would have been subject to a viability assessment. Evidence should also demonstrate that implementing a 20% requirement would not place delivery of the Blay's House allocation (Policy SL5) at risk due to feasibility / viability concerns. The requirement for all new development to incorporate appropriate species-related measures will be onerous for householder development and challenging to monitor and enforce. Officers are of the view that these measures should be encouraged rather than required, in line with guidance in the GBI SPD.	Changes to policy NE2 ensure that the aim of providing 20% biodiversity over and above the 10% required is retained. It is not accepted that all new buildings and extensions should not be required to incorporate species related measures, this is a cheap and easy design feature to incorporate. There are examples given, but planting would also fulfill this requirement.	Change to Policy NE2
p35	The aspirations of the policy are supported but RBC's Tree Officer and Development Management Officers are concerned about the practicality of implementing it. Strategic Local Plan policies require development proposals to consider the impact on existing trees and to include measures to enhance their role through retention, additional or replacement planting (paras 7.5, 7.64), but Policy NE3 introduces very prescriptive requirements which go beyond Local Plan requirements and those of the NPPF. Para 131 of the NPPF seeks to ensure existing trees are retained wherever possible; and para 180(c) confirms that planning permission should be refused for development resulting in the loss of aged or veteran trees found outside of ancient woodland. Encouraging the provision of new trees and hedgerows in the first paragraph is a good principle and is necessary to address the challenges that face us globally and to enhance the environment locally. Planters should be considered as a last resort to naturally planted trees and these should only be considered where underground conditions	Comments noted. Changes to the text in paras 11.17, 11.18, 11.19 and 11.21 have been made and Policy NE3 now references BS5837 and the Design Code has been changed to match the ratio of replacement trees. The requirements for hedgerows have been moved to the text.	Changes to paras 11.17-11.21 and NE3

are such that a tree cannot be planted in the ground, for example, where services are present. The second paragraph resists the removal of mature trees on development sites, which is supported in principle. Reference could be made to Runnymede's GBI SPD which requires applicants (except householder applications) to conduct a GBI Audit to identify natural features at the property – including mature trees – which could offer opportunities for retention and enhancement. Where there is potential risk of a proposed development harming a tree, applicants should seek specialist arboricultural advice to ensure compliance with legislation and planning policies (see para 4.2.11). The qualification in Policy NE3 that a mature tree should be healthy and appropriate for the location, is somewhat open to interpretation and this does give a degree of flexibility when considering proposals but also a degree of uncertainty as to which tree are 'appropriate for the location'. The evaluation of trees on development sites has been guided by BS 5837 for many years. The latest version (of 2012) is a document which was considered at great length by a panel of arboriculturists. This includes a nationally recognised way of evaluating trees and grades their retention value. Officers suggest that this is referenced to provide certainty around whether a tree is appropriate for the location. This would also align with design code CH.01 on p43 which promotes the use of BS 5837, and states 'existing trees should be retained as much as possible'. The prescriptive planting ratio for replacement trees is somewhat inflexible – does this apply for every mature tree that is lost, or every tree? Most trees that are lost to a development are required to be removed because they conflict with the buildings, hard surfacing, lighting requirements, utilities etc. Whilst it is desirable to retain the trees, planting three trees on development sites for every one tree lost would only build in future conflict between the trees and the built environment, and possibly each other. When granting permission, it is recognised that the site can't accommodate both. The prescriptive nature of the 3:1 ratio for all development sites would be unwise to be applied generally, and could place limitations on making effective use of land in meeting the need for homes and other uses (para 119 of the NPPF). The policy should introduce caveats where a ratio of 3:1 is not feasible. The policy requirement is also at odds with design code EN.08 which states that existing trees should be replaced on a minimum 1:2 ratio if affected by new development (p47). Design code CO.06 then goes on to say that existing trees should be replaced on a 1:5 ratio (p51). The policy goes on to promote

the selection of native species, which is not necessarily a sustainable approach when considering global warming as heat intolerant native populations are predicted to migrate northward. Species demonstrating tolerance to a changing climate should also be considered. The GBI SPD recommends that site-specific arboricultural impact assessments / surveys should be relied upon to determine the most appropriate approach. An approach to BNG and green infrastructure enhancement, including through tree planting, would usually be presented in a landscaping plan/strategy or masterplan. Policy NE3 should provide clarity on what needs to be submitted with a planning application to demonstrate requirements have been achieved and should potentially signpost policies seeking biodiversity net gains for which tree planting will be a key consideration. The second paragraph of Policy NE3 also promotes the planting of two new trees for each dwelling (presumably each new dwelling), where garden space allows (this is reiterated in the final bullet point of design code CH.01). This would be very difficult to implement for any flatted scheme, where communal garden/amenity space would potentially be crowded with trees. Officers agree that opportunities should be taken to plant trees in gardens, but such a prescriptive requirement may not be appropriate or feasible for all development scenarios. Suggest that the policy be amended to promote a significant net gain in appropriate trees where feasible, particularly in dedicated communal areas where they can contribute to the public realm and are in public control. Where additional tree planting is proposed, this should be evidenced in a landscaping plan/strategy appropriate to the scale of development. The final paragraph of the policy also sets out very prescriptive requirements which will be challenging to enforce. Officers agree that diversity of species in hedges is important for resistance to diseases and habitat, and that a hedge is a preferable boundary treatment to a fence, but the policy as written is very restrictive. It is also somewhat at odds with principles in the Design Codes document, such as CH.01. Townscape and landscape quality, which promotes hedgerows in front of bare boundary walls and to separate properties. Achieving a 2m buffer from new buildings would place significant restrictions on the design of a scheme. Officers suggest that the final paragraph is amended to promote new, species-rich boundary hedgerows, but the recommended standards should be transferred into the supporting text as guidance.

p36-37	The policy repeats much of Local Plan policy CF1, which could be signposted in a more concise NP policy which serves only to identify specific facilities for consideration in the EGV Neighbourhood Area. The final paragraph repeats Policy ND5, which could be signposted in supporting text. There are many examples of where new or redeveloped community facilities have been delivered in communities which make a positive contribution to the area, but which do not necessarily replicate (but do respect) the existing character of the area. Care should be taken to avoid restricting the delivery of distinctive, modern community facilities.	It is considered generally unhelpful to simply signpost Local Plan policies in the NP policy because the reader may not have a copy of the Local Plan available. However reference to the Local Plan policy has been included at para 12.6. Minor change to last paragraph of CF1 for clarification.	Change to para 12.6 and CF1
p37-38	Suggest amending the reference in paragraph 12.8 to “Paragraph 101 of the NPPF”. The policy identifies several school playing fields as Local Green Space. The NPPF is clear (para 103) that development proposals on Local Green Space should be considered in line with strategic Green Belt policies – which include some exceptions to the construction of new buildings being considered as inappropriate development in the Green Belt and therefore do not need to demonstrate very special circumstances (for example, new buildings for outdoor sport and recreation; or the extension or alteration of a building, which could include a school building). Suggest amending the second paragraph to make it clear that not all new development will need to demonstrate ‘very special circumstances’ in accordance with strategic Green Belt policies	Noted, amendments made to para 12.8 and Policy CF2	Change to para 12.8 and Policy CF2
p38-40	Does the policy imply that medium-sized businesses are not supported, even where impacts can be satisfactorily mitigated, and that re-use of vacant or redundant non-historic buildings is not supported? Reference to appropriate signage could signpost guidance in the Design Codes document (e.g. CO.14 on p74). In most instances conversion of floorspace for home working will not require planning permission (as long as a home remains a home and does not become a business premises). This could be clarified in the supporting text. If home working is supported, the prescriptive nature of the housing design codes may limit the ability of residential proposals to provide dedicated office space (the typical dwelling examples on p54-55 do not make reference to office/study space).	Added text to the policy explaining that the scale of development needs to be appropriate to the setting and the village. It is not accepted that the Design Code would restrict home working proposals, pages 54-55 relate to solar panels and green roofs.	Changes made to 13.12 and Policy ES1

p40-43	Policy ES2, as drafted, could be interpreted as restricting all retail development to only two locations in the whole Neighbourhood Area, whereas Policy IE5 of the Local Plan allows for some flexibility if proposals come forward elsewhere (applying a sequential approach). Officers would welcome more clarity about how applicants can calculate and demonstrate the percentage of units remaining in Use Class E – should planning applications be accompanied by a survey carried out by the applicant? Has the Forum considered whether any shops might fall within Use Class F2? Some of the units listed in Annex E could also be Sui Generis (public houses/drinking establishments with expanded food provision, hot food takeaways, and potentially beauticians). Suggest that paragraph 13.18 introduces a caveat that the ‘snap shot’ of uses in Annex E is subject to confirmation by the local planning authority	This is not the case, retail development outside these two locations will be subject to Local Plan policies in any case. Text added to para 13.18 to explain about calculating the balance of Class E uses and Classes added to Annex E.	Change to para 13.18
Class E	The PPG states that the Forum should set out and explain in a draft NP the prioritised infrastructure required to address the demands of the development identified in the plan, so the principle of including a policy on this topic is supported. However, some of the assertions made in the policy and supporting text are incorrect or unclear. The following should be considered: • Amend paragraph 14.3 and 14.4 to reflect the following: only development proposing residential and/or offices (Class E(g)(i)) where net additional floorspace is 100sqm or more or proposes 1 or more dwellings is affected by the CIL charge). All other development will not be liable for CIL in Runnymede. The levy is charged at differential rates in £ per sqm according to the type of development and the charging zone within which it is located. CIL is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area. Suggest that the NP	Changes made to paras 14.3 and 14.5 including reference to Policy SD5 of the Local Plan. Para 14.7 explains that much of the funding received from these mechanisms will be spent on Borough wide priorities. Change to final bullet point to Policy I1	Changes to paras 14.3 and 14.5 and Policy I1

	signposts further details, including the CIL Charging Schedule, available at: Community infrastructure levy (CIL) – Runnymede Borough Council. • Paragraph 14.7 infers that developers should deliver infrastructure in line with local priorities. Whilst community engagement is an important element of preparing a planning application, developers should take account of Policy SD5 and infrastructure priorities identified in the Infrastructure Delivery Plan, which have been examined and found sound at Examination in Public. Policy SD5 sets out how development proposals will deliver infrastructure through on-site provision or financial contributions secured through S106, s278 or licensing agreements and through CIL or its successor. As explained in paragraph 14.6, where all or part of a chargeable development is within the Neighbourhood Area, a proportion of the CIL receipts will be passed to the Forum to deliver local infrastructure priorities which address the demands that development places on that area. There is scope for the NP to identify these priorities (either in the plan itself or in a supporting document which can be updated periodically), but Policy I1 as drafted is not supported by the Council and should be amended to more closely reflect the detailed mechanisms in Policy SD5. • Final bullet point: developers are not responsible for providing suitable capacity in utilities infrastructure – whilst they need to engage with these infrastructure providers early in the development management process, there are statutory obligations on utility companies to connect new development to their networks. The Council works closely with utility providers to raise awareness of their growth plans, which can be factored into utility companies’ business/investment plans.		
p45-47	Suggest that the second paragraph makes reference to Surrey County Council’s EV charging standards – which not only includes standards for new housing development, but also for non residential development proposals. Feedback from SCC on this policy will be useful. Suggest amending the fourth and fifth paragraphs of the policy to provide clarity that the requirement is presumably in relation to publicly accessible off-road parking spaces (otherwise this requirement would conflict with the first paragraph, which considers applications against RBC’s Parking Standards). Suggest that some flexibility/exceptions are introduced to this policy to allow a planning judgement to be made – for example, as drafted it wouldn’t allow for the development of community facilities which could result in the loss of parking spaces but which would deliver other benefits. The policy could be amended to require new development resulting in the loss of public parking to provide justification. A parking survey could be conducted which would need to demonstrate that existing spaces are underutilised and that new proposals would provide adequate capacity to accommodate existing, and any additional, demand generated by the proposed use.	Para 15.10 describes the content of SCC's EV standards. Policy TT1, 4th paragraph has been amended to allow some flexibility.	Policy TT1 amended

p47-48	RBC's Parking Standards SPD (currently being finalised) requires cycle parking in all new residential and many non-residential developments, along with safe and secure cycle parking storage. Surrey County Council guidance also states that consideration should be given to the provision and availability of electrical sockets adjacent to any secure parking in order to support the growth and use of electric bikes. These standards could be signposted by Policy TT2 for further guidance. However, further evidence needs to be provided on design and cost factors in providing adaptable space and access for storing and charging mobility aids. The size, access and storage requirements for bicycles are materially different from that of powered mobility scooters. If this evidence is cited, clarity also needs to be provided on standards for different types of development – it is anticipated that sheltered/supported/specialist older persons housing units might demand higher standards than C3 market housing units, for example. Any requirement for ancillary structures for mobility aids could link back to the requirement in Policy SD7 which requires a proportion of major residential schemes to deliver wheelchair adaptable and wheelchair accessible units. Suggest amending the policy/supporting text to make reference to guidance in design code SU.01 on bicycle, e-bike and e-scooter storage.	SCC's standards are referenced in para 15.10. It is not considered that specific evidence is needed to support the policy for provision of mobility scooter charging and storage, this would be disproportionate to the NP evidence requirements.	No change
p48-49	Suggest that this policy is amended to state how Transport Assessments and Travel Plans submitted in support of developments proposals which generate significant traffic movements should include SD3: Active & Sustainable Travel SD4: Highway Design Considerations measures that manage traffic speeds and enhance accessibility and connectivity for pedestrians, cyclists and horseriders. This would improve alignment with Policies SD3 and SD4 of the 2030 Local Plan. Officers consider it unreasonable to require this of all types of new development. As well as being attractive and complementing the character of the Area, the second paragraph of this policy should also include other key considerations including that the new infrastructure is designed to be accessible and safe.	Para 15.19 has been amended to include reference to SD3 and SD4. Policy TT3 second paragraph amended to reflect points made.	Changes to 15.19 and TT3

p50-51	This policy is missing a title. The description of the extent of the campus differs to that recognised by the Council. Outline planning permission has been granted (Ref: RU.14/0099, subject to conditions) for the university's masterplan for development up to 2031. This consists of a northern part of the campus, which falls within the designated Urban Area to the north of the A30, and a southern part of the campus, which falls within designated Green Belt to the south of the A30. The campus north of the A30 includes buildings which accommodate academic, social and sport and accommodation uses. Suggest paragraph 16.1 be amended to reflect the true extent of the campus/area subject to planning approval. The first sentence of the policy cannot exclude the multi-storey car parking proposals. The approved masterplan included illustrative proposals for multi-storey car park provision and other redistributed car parking provision, and these matters have been accepted in principle. This statement is therefore contrary to the approved masterplan and will unfairly prejudice any future reserved matters applications for development. The second sentence of the policy resists development proposed in any other parts of the Area. Paragraph 16.4 of the supporting text also states "the preference is for no further RHUL development within the village". Officers are concerned that these statements are not in conformity with Policy SD1 of the 2030 Local Plan, which supports the delivery of net additional dwellings and student bedspaces. Suggest these statements are amended to provide a positive framework for sustainable development, in conformity with Policy SD1.	Title added. Paragraph 16.2 amended to reflect the campus area shown in the masterplan. Policy RHUL1 amended to remove reference to the multi story car parking, second sentence amended to exclude the masterplan 'in principle' approval.	Title added, changes to para 16.2 and Policy RHUL1
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RHUL and Design Code	The second paragraph states that development must be in conformity with the Design Code. Whilst the campus to the south of the A30 is situated within the Green Belt, and will be subject to strategic Green Belt policy requirements, the Design Code suggests that development here is not subject to 'Green Belt Design Code Zone' principles. The table on p33 of the Design Code also suggests that design code HO.01 'The spatial strategy 2015 to 2030' does not relate to the University South DCZ area, yet development coming forward in this zone will very much help deliver the Local Plan spatial development strategy objectives. A University South DCZ is limited to the RHUL grounds to the south of the A30, yet the Design Code states that "generally, the design code CO.06 Students detailed in the Urban Area Design Code Zone is of application in the University South Design Code Zone. However, as new designs in the University South Zone don't have a great potential to negatively impact the existing urban tissue, the code CO.06 should be applied flexibly and taking into consideration the input that RHUL stakeholders might have on design". On p36, Note 2 states that design code CO.06 should be applied equally to both the Urban Area and the University South Design Code Zones. Some of these statements are confusing, and slightly at odds with each other. The university south area is located within the Green Belt and strict planning controls apply to development proposals here, in line with strategic 2030 Local Plan and NPPF policies. These Green Belt policy requirements – such as avoiding impacts on the openness of the Green Belt - will be key considerations in the design of any scheme located in the Green Belt, which may limit the ability of a proposal to meet all of the relevant design code requirements, including code CO.06. Design code CO.06 also seeks to avoid 'gated developments'. Whilst the need to integrate new development into existing development is an important element of design, officers are of the view that this shouldn't be restricted to student development only (and this would better reflect design code CH.05 which suggests all new development should be effectively integrated with existing uses). Feedback from RHUL would be useful here regarding the safety implications of avoiding gated developments for students. As stated above, there are inconsistencies between policy requirements of the EGV NP and the requirements of the Design Code. For example, on p51 design code CO.06 refers to replacing trees at a 1:5 ratio yet Policy NE3 requires a 3:1 ratio. The requirements of CO.06 on p52 are described in the 'Urban Area Design Code Zone' section yet refer to the character of the original buildings situated in the University South Zone. Does this imply that new development coming forward in the Urban Area Design Code Zone (e.g. within the University North Character Area) must reflect the character of the original buildings in the University South Zone? Or would the immediate local context take precedence (as per design code CH.01)? Page 86 of the Design Code refers to design code CO.06 being detailed in the University South Design Code Zone section – but no further details are provided.	This text has been removed from the Design Code. The text 'Not all types of development proposal will be able to apply all design code principles, but they should refer to those principles that are relevant' has also been inserted. The table on Page 33 has been removed, and the text referred to on page 36. Text added to refer to GB controls in line with the Local Plan and NPPF. The text relating to gated developments has been removed: gated campus and student residences sites within the Urban Area should be avoided, so that it simply emphasises the need for developments to integrate with the surrounding area.
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Policy RHUL1	The NPPF states that design codes should be prepared to provide a local framework for creating beautiful and distinctive places with a consistent and high-quality design. The fourth paragraph of the policy refers to exceptional design quality, which is a requirement that goes beyond the requirements of the NPPF and the strategic design policies in the 2030 Local Plan. The fifth paragraph refers to ‘balanced transport provision’ – suggest this is better defined to provide clarity when determining planning applications. The traffic impacts of development are assessed via a Transport Assessment or Statement (required by Policy SD4 of the 2030 Local Plan), where development proposals fully explore the impact they may have on the highway network and identify measures to mitigate impacts to acceptable levels. The policy could be better aligned to Policy SD4 to say that where new development in close proximity to the middle of the village (although both these parameters need clarification), the Transport Assessment/Statement submitted with the planning application should carefully consider impacts on parking in the middle of the village and identify measures to mitigate impacts to acceptable levels. The policy could again reference RBC’s Parking Standards SPD to ensure “adequate levels of student, staff and visitor parking” is provided (as per draft Policy TT1 of the neighbourhood plan).	Points noted and changes to 4th and 5th paragraphs of Policy RHUL1, replace 'exceptional' with 'high' and add in the requirements for a Transport Assessment or Statement and the need to take account of the impact on the middle of the village.	Changes to Policy RHUL1
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Policy RHUL1 & Design Code	The second paragraph states that development must be in conformity with the Design Code. Whilst the campus to the south of the A30 is situated within the Green Belt, and will be subject to strategic Green Belt policy requirements, the Design Code suggests that development here is not subject to 'Green Belt Design Code Zone' principles. The table on p33 of the Design Code also suggests that design code HO.01 'The spatial strategy 2015 to 2030' does not relate to the University South DCZ area, yet development coming forward in this zone will very much help deliver the Local Plan spatial development strategy objectives. A University South DCZ is limited to the RHUL grounds to the south of the A30, yet the Design Code states that "generally, the design code CO.06 Students detailed in the Urban Area Design Code Zone is of application in the University South Design Code Zone. However, as new designs in the University South Zone don't have a great potential to negatively impact the existing urban tissue, the code CO.06 should be applied flexibly and taking into consideration the input that RHUL stakeholders might have on design". On p36, Note 2 states that design code CO.06 should be applied equally to both the Urban Area and the University South Design Code Zones. Some of these statements are confusing, and slightly at odds with each other. The university south area is located within the Green Belt and strict planning controls apply to development proposals here, in line with strategic 2030 Local Plan and NPPF policies. These Green Belt policy requirements – such as avoiding impacts on the openness of the Green Belt - will be key considerations in the design of any scheme located in the Green Belt, which may limit the ability of a proposal to meet all of the relevant design code requirements, including code CO.06. Design code CO.06 also seeks to avoid 'gated developments'. Whilst the need to integrate new development into existing development is an important element of design, officers are of the view that this shouldn't be restricted to student development only (and this would better reflect design code CH.05 which suggests all new development should be effectively integrated with existing uses). Feedback from RHUL would be useful here regarding the safety implications of avoiding gated developments for students.	Design Code changes: The name of the 'Green Belt' zone has been changed to 'Rural Area' to reduce confusion. The table on page 33 of the Design Code has been removed. Page 36 Note 2 text has been removed. Text added to refer to GB controls in line with the Local Plan and NPPF. The text relating to gated developments has been removed:gated campus and student residences sites within the Urban Area should be avoided, so that it simply emphasises the need for developments to integrate with the surrounding area.	
Design Codes and masterplans	The National Model Design Code explains how design codes should be a set of simple, concise, illustrated design requirements providing detailed parameters for the physical development of a site or area (para 5). Within these parameters there should be scope for flexible application to allow for innovation (para 18). Officers would welcome any opportunity to simplify and streamline these documents to make them easier to implement at development management stage, perhaps through reducing repetition between the documents and with the 2030 Local Plan - for example, many of the design principles in Chapter 4 of the Design Codes document duplicate those of the Local Plan.	Noted, the intro to HO. Housing explains this. The MP document has been streamlined, however, the Design Codes document expands on LP policy and has been specifically written with the Englefield Green Area, the LP refers to the whole Borough.	

Design Codes and masterplans	Similarly, much of the Masterplans document replicates text in the Design Codes document (p32-54), and removing or reducing this repetition could help to create a condensed document which is easier to navigate. An area to the north of Cooper's Hill Lane appears to fall within the 'Urban Area Design Code Zone'. This will cause confusion as the area remains in the designated Green Belt. Any development coming forward in this area will be considered against the Green Belt policies of the 2030 Local Plan and the NPPF, and design principles should very much be drafted with these restrictions in mind.	The naming of the zones has changed from 'Green Belt' to 'Rural' which removes the confusion.	
Design Codes and masterplans	Whilst the Design Codes document is trying to identify an area where the same design codes apply, the 2030 Local Plan sets out distinct policies which apply for development proposals on land in the designated 'Green Belt' vs. the 'Urban Area' (as illustrated on the Policies Map). The Design Codes document should try to identify areas which are consistent with these designations. This also creates confusion in the Masterplans document – p30 suggests the two sites are located within the Urban Area Design Code Zone, yet the Cooper's Hill site is located in the Green Belt and should be subject to design principles which are tailored to the specific requirements of Green Belt policies.	The naming of the zones has changed from 'Green Belt' to 'Rural' which removes the confusion.	
Design Codes and masterplans	The key to the table on p32 of the Design Codes document is also confusing. Upon initial inspection the crosses against the environment and landscape design principles would suggest that these design codes do not relate to the Green Belt Design Code Zone. Suggest the key be amended to make it clear that a cross does not represent an irrelevant design principle.	The table has been removed	
Design Codes and masterplans	It is unclear how the typologies for new housing on p58-60 of the Masterplans document relate to the HO.05 Housing dimensions and spatial requirements presented on p54-55 of the Design Codes documents. This should be clarified.	This section has been removed for clarity	
Design Codes and	The text on p61 of the Masterplans document does not relate to orientation of development.	Page removed from MP document and updated in DDC	
Design Codes and masterplans	Officers are concerned that the general baseline typologies in Chapter 7 of the Masterplans are very prescriptive and will restrict flexibility of design. Broader parameters would allow development proposals to respond more effectively to the unique context and set of policy constraints/requirements that each site is subject to (including strategic policy requirements in the 2030 Local Plan).	This section has been removed.	
Design Codes and masterplans	Clarity would be welcome regarding the maximum building heights prescribed on p62. Does the height limit refer to individual houses, and/or to flatted development?	This section has been removed	

Design Codes and masterplans	Officers are concerned that the specified housing dimensions and conditions could undermine the delivery of site allocation SL5, and the efficient use of land as required by the NPPF.	This section has been removed	
Design Codes and masterplans	Officers are also unclear whether the requirements of strategic policies in the 2030 Local Plan have been fully taken into account in preparing both the Design Code and Masterplans documents. For example: • Have the green infrastructure design principles in both the Design Codes and Masterplans documents taken into account open space standards requirements in Policy SL26 (as signposted in Policy SL5)?	Updates to Master Plan sites text has been added to better reference this policy	
Design Codes and masterplans	• If applicants are to deliver different housing types, sizes and tenures of housing to reflect various needs, as required by HO.Housing (p30), it would be helpful to direct them to the appropriate strategic policies in the 2030 Local Plan, such as Policies SD1, SL5, SL19, SL20, SL22, SL23 and SL24.	Typology section has been removed.	
Design Codes and masterplans	On p30, design code HO.02 describes 'this strategy' as setting out the preferred locations for growth with consideration to the quantum and spacial (should be spatial) distribution of development needs. This should be amended to refer to the 2030 Local Plan.	Amended	
Design Codes and masterplans	Design code HO.03 should be amended to refer to the borough working to deliver the quantum of development specified in the 2030 Local Plan, rather than referring to the HMA.	Amended.	
Design Codes and masterplans	• Have the minimum dimensions and spatial requirements for housing in design code HO.05 taken into account the requirements of Policy SD7, in that a proportion of units in major residential schemes need to be wheelchair accessible/adaptable in accordance with Part M of the Building Regulations?	This section has been removed	
Design Codes and masterplans	• The reference to Lifetime Homes standards on p49 (design code CO.05) should be amended as these standards have been withdrawn and replaced with national Building Regulations Part M equivalents. Policy SD7 seeks to deliver Lifetime Homes equivalent standards for a proportion of residential units in major schemes, to reflect local housing needs. The title of the design code should also be reconsidered, as lifetime homes equivalent standards could accommodate a wider range of needs than just those of older people.	Text and title changed	

Design Codes and masterplans	Design code CO.06: Students – it is not always possible to identify a development proposal as a student resident scheme. Consider amending language to align with that of the 2030 Local Plan Policy SL23, which refers to purpose-built student housing and changes of use for the purpose of student housing. If the design code is about achieving permeability and integration of new development, consider applying this to all new development rather than solely that of student accommodation. It is unclear how all purpose-built student accommodation will adhere to the architecture principles on p52 – would a development proposal in the urban area north of the A30 need to draw on the character of the original university buildings, or should it respond to the immediate local context in accordance with design code CH.01?	Comment noted, but it is considered that this Code is sufficiently clear	
Design Codes and masterplans	HO.05: Housing should be amended to provide clarity that the housing mix and size requirements are set out in strategic policy SL19 – and that the examples given may not apply to all the different types and tenures of property.	This section has been removed	
Design Codes and masterplans	Officers are concerned that the prescriptive requirements on p56, 'Extensions', could prohibit extensions which may not be considered harmful.	Not accepted, the wording says 'should' so there is some flexibility	
Design Codes and masterplans	Has design code EN.11 Green Belt been written in accordance with the strategic policies of the 2030 Local Plan and NPPF? Suggest amending the phrase “New development on the Green Belt is not allowed” to align better with NPPF language. The exceptions listed on p48 of the Design Codes document are too simplistic and do not present a comprehensive understanding of what may be considered appropriate development in the Green Belt – suggest EN.11 is removed (as its principles are already set out in strategic policy) or a link to the relevant section of the NPPF is provided for access to full requirements. Many of the statements in Section 7 are contrary to the approach set out in the NPPF and 2030 Local Plan regarding how development in the Green Belt should be considered.	This section has been removed	
Design Codes and masterplans	Of significant concern: the masterplan concept for Coopers Hill spreads development into the undeveloped part of the Green Belt – woodland houses and parking in this area are likely to be considered ‘inappropriate development’ as per NPPF and 2030 Local Plan principles, and would therefore need to demonstrate very special circumstances. This could be misleading for readers.	Noted	

Design Codes and masterplans	Has the proposed layout in the Masterplans document taken into account risk of flooding (as required by Policies EE13 and SL5) and the need to provide Sustainable Urban Drainage systems in accordance with policies EE12 and EE13 of the Local Plan	No, as this technical baseline was not available. Some text has been provided to cover this issue	
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