

Surrey County Council

<u>Location</u>	<u>Summary</u>	<u>Response</u>	<u>Action</u>
P5 and P14	<u>Minerals and Waste</u> There is a mineral safeguarding area (MSA) (can be seen on our online map viewer tool) to the west of the main village, within the plan area that the Neighbourhood Plan covers. Within the plan documents there is no mention of this designation. The Minerals and Waste Planning Authority seeks to safeguard MSAs from other development that would sterilise the underlying mineral resource as per Policy MC6 of the Surrey Minerals Plan. The Minerals and Waste Planning Authority is concerned not only with non-minerals development within MSAs but also development proposed adjacent or within proximity to a MSA or an existing mineral working. The MSA is therefore consulted by the relevant District and Borough Council on any applications in these areas. For clarity it would be useful for the Englefield Green Village Neighbourhood Plan to reflect this designation. We would suggest that it is mentioned in the constraints section in paragraph 5.4 (page 14). We note that Surrey County Council is mentioned as a partner in paragraph 17.3 (page 52), but there is no mention of the minerals and waste function. We would suggest that minerals and waste is added to the list mentioned here. In light of the above comments, we would suggest that the Surrey Minerals and Waste Local Plan that forms part of the development plan for the area is mentioned in paragraph 2.4 (page 5).	Thank you. Reference to the Minerals Local Plan and MSA has been added to paras 2.6 (new para), 5.4 and 17.3	Changes to paras 2.6, 5.4 and 17.3
	<u>Heritage</u> We are pleased to see that the Neighbourhood Plan has a strong heritage thread running through it. The heritage thread is primarily focused on the built heritage, although it is pleasing to note the inclusion of policy C2 covering strategic views. There is however a lack of consideration of landscape or archaeological heritage issues. Whilst these can be addressed adequately through the application of the existing Runnymede Borough Council Local Plan policies, it can be useful to see these issues additionally reflected in Neighbourhood Plan documents as it provides information about what the local community considers to be important, and provides for a more rounded appreciation of the heritage assets of the area. SCC has been commissioned to produce a Conservation Area Assessment and Management Plan (CAAPM) for the Englefield Green area, work on which is currently underway. There are a few references to	It is recognised that a new CA document is being produced, but due to the delays in production, it was prudent to continue with the Local Plan. Text in the NP will be updated if timing allows. The list of NDHA has been thoroughly checked and owners notified as per the supporting document to the NP.	None

the Englefield Green area, work on which is currently under way. There are a few references to this document within the Neighbourhood Plan and it might have been preferable to await the completion of this prior to drafting the Neighbourhood Plan so the two documents could inform one another, but we accept that this might not have been possible as they have had different timescales. We would suggest, however, that the Neighbourhood Plan remains in draft form until the CAAMP is completed to ensure there are no discrepancies between the two. The most significant concern is the suggested Local List of non-designated Heritage Assets contained in Annex D. A considerable number of these are not included on the Runnymede Borough Council Local List and operating two distinct local lists within the same area, although feasible in principle, will be problematic in practice. No clear criteria for the selection of the additional features has been provided and a quick random check suggests that some may not reach the thresholds of significance for inclusion on such a list that are set out in the national guidance document Historic England Advice Note 7: Local Heritage Listing: Identifying and Conserving Local Heritage. There is a risk in taking this approach of devaluing the protections that Local Listing mechanisms can provide within the planning process, and we strongly recommend that this aspect of the Neighbourhood Plan be discussed with Runnymede Borough Council (who have **Education**). We note that a list of schools in the area is included in paragraph 3.17 (page 10). Englefield Green Infant School is now called St Jude's Church of England Infant School, so this should be amended.

Noted and text changed

para 3.17 updated

P25

Sustainable Buildings and Construction We note that paragraph 8.40 (on page 25) refers to the main elements to achieve net zero carbon building and sources for further information and definitions. Reference should also be made to the June 2022 update to part L of the Building Regulations. The energy efficiency measures (bullet 3), and sustainable design and construction standards (bullet 6) referred to in policy ND6 are required to meet the measures in part L of the Building Regulations. Bullet 4 of policy ND6 refers to any new development incorporating on-site energy generation from renewable sources such as solar panels. The Design Code document has addressed potential limitations which may make installing solar panels difficult, such as the visual elements and heritage compatibility. Alongside the specifications on conventional solar panels it would be useful to also explore alternative renewable energy options such as solar roof tiles, and this should be captured and encouraged in the design guide. Bullet 5 of policy ND6 refers to the retrofit of existing buildings. The terminology should be aligned to be consistent with Historic England's Energy Efficiency and Historic Buildings: Application of Part L of the Building Regulations to Historic and Traditionally Constructed Buildings. "Renovation" to be used in place of the word "retrofit".

Noted, paragraph 8.40 has been added to. Para 8.40 amended
It is considered that renovation is not the correct term to use in the policy as it differs in meaning from retrofit.

P46, P52

Liveable Neighbourhoods We note in paragraphs 15.2 to 15.6 (on page 46) and the aspirations on page 52 the wishes of many in the community to see speed limit reductions, control parking behaviour and encourage walking, biking, and the use of public transport. The Surrey County Council Local Transport Plan 4 was approved in July 2022 and is available at www.surreycc.gov.uk/roads-and-transport. It sets out county-wide policies on reducing transport emissions in order to help meet the county's commitment to becoming net zero by 2050. This includes policies on planning for place and specifically establishing 'Liveable Neighbourhoods'. The aim of the policy is to plan, design and improve local neighbourhoods to provide attractive environments for people, and to increase opportunities to live and work locally in order to reduce trip numbers and lengths. 'Liveable Neighbourhoods' are themed spaces that upscale the importance as places for people, and not just their importance for the movement of vehicles. Key characteristics of Liveable Neighbourhoods include: increasing the comfort, safety and accessibility of walking and cycling; creating space for community facilities like parks, gardens, play spaces and seating; creating attractive local environments and welcoming neighbourhoods that people want to live in; reducing the dominance of cars and goods vehicles resulting in improved safety, air quality and noise pollution to encourage more walking, cycling and social interactions. SCC's Strategic Transport Group will be working closely with Boroughs and Districts to substantiate its Liveable Neighbourhoods agenda across the County with a view to set out its delivery programme soon.

New paragraph added at 15.7

New paragraph added after 15.6

Local Green Spaces We note that policy CF2 proposes to designate St Jude’s Junior School Playing Fields, St Cuthbert’s Catholic Primary School Playing Field and St Jude’s Church of England Infant School Playing Fields as Local Green Spaces. We support the protection of green spaces. The schools have been notified of the designation. Text has been amended slightly in the Policy CF2 to allow for exceptional need for the schools.

However, Local Green Spaces are also usually available for public use and hence discussion should be carried out with the schools to review how such a policy fits in with their safeguarding and community shared use arrangements. Whilst designation does not in itself confer any rights of public access over what exists at present, any additional access would be a matter for separate negotiations. We also suggest that the plan should acknowledge that exceptions to Policy CF2 might be acceptable where schools need to expand for operational reasons and as a last resort the only land available may comprise part of an existing playing field. There may be rare circumstances where the most sustainable option is to expand a school on at least part of a school playing field site, where this is to meet residents’ needs and deliver Local Plan sustainable development, community wellbeing and life-long learning objectives. Any such circumstance would need to ensure that any adverse effect on the function and character of open space be minimised. Clearly playing fields should be protected from loss to development, however Local Planning Authorities also need to ‘take a proactive, positive and collaborative approach to meeting the requirements of local schools. As per Paragraph 95 of the National Planning Policy Framework, the need to create, expand or alter schools will be given great weight in decisions on applications.’ Reference should be made to Policy SL27 of the Runnymede Local Plan which states that ‘Within a designated Local Green Space development will not be permitted other than development which supports the use of the Local Green Space or where very special circumstances can be demonstrated and which outweigh the harm to the Local Green Space.’

