

Surrey Wildlife Trust

<u>Location</u>	<u>Summary</u>	<u>Response</u>	<u>Action</u>
	We note that Surrey Wildlife trust's Ecology Services was commissioned to undertake a piece of work to inform the development of the draft Englefield Green Village Neighbourhood Plan. We also note that many of the recommendations of this Biodiversity and Green Spaces report have been incorporated within the draft plan. Draft policy NE1 sets out that 'proposals will be supported where the green and blue infrastructure network will be enhanced to increase connectivity between the site and across the landscape'. There are areas within the village (specifically Bakeham House at Prune Hill; Royal Holloway grounds [Canada Copse, woodlands rear of Spring Rise; A30 Egham Hill [University accommodation grounds]; woodland rear of Middle Hill-Parsonage Rd.; Englefield Lodge grounds; rear of Spencer Gds.; woodland rear of Baron's wood; Runnymede Park) that provide useful connections between Biodiversity Opportunity Areas (BOA) at Windsor Great Park (TV01) and Runnymede Meadows and Slope (TV02). BOAs are considered very important as they represent a targeted landscape-scale approach to conserving and recovering biodiversity and are areas where the greatest opportunities for habitat creation and restoration lie, which would eventually becoming part of Surrey's Nature Recovery Network. Therefore, we recommend that draft policy includes the important GI corridor connecting these BOAs.	Thank you, text added at para11.9 and Policy NE1	

In addition, recommendations made within the Biodiversity and Green Spaces report relating to sensitive lighting; the inclusion of ponds etc do not appear to have been taken forward within the draft Neighbourhood Plan, although it is understood such matters are considered within Runnymede Borough Council's Green and Blue Infrastructure Supplementary Planning Document (SPD), November 2021. No reference appears to have been made to the mitigation hierarchy to limit negative impacts to biodiversity i.e. to avoid impacts in the first place, or if this is not possible, mitigate negative impacts and as a last resort, compensate for said impacts. The mitigation hierarchy is referenced in both the NPPF and Runnymede's Local Plan policy EE9 and so it is our assumption that these policies are inherently considered within the draft Neighbourhood Plan.

Finally, the recommendations within the Biodiversity and Green Spaces report include proposed mitigation to be partially funded through the CIL and S106 agreements. No reference is made to these recommendations within the draft Neighbourhood Plan. Whilst it is for the Neighbourhood Area to determine what should be funded through utilising the CIL community topslice, we advocate the use of such funding to help deliver biodiversity enhancements and robust management and monitoring strategies of biodiversity, where this is appropriate.

Noted, text added to 11.10

Para 11.10 (previously 11.9)

Historic England

	We welcome the inclusion of a Design Code and Character Assessment as helping to provide the required “understanding and evaluation of each area’s defining characteristics” (NPPF, paragraph 127). We feel that it would be helpful to include a commitment to monitor the effectiveness of the design code and its influence on decisions. This would enable support for any changes to the design code that the community consider necessary to further meet their expectations when the plan is reviewed.	Support noted	No change
Policy C2- Views	We welcome the inclusion of this policy .It would however benefit from a Criteria for Selection with a brief examination of each views interest in relation to these criteria should be added. A map clearly identifying the key views would add clarity to the plan.	Map 2 shows the views and there is a separate supporting document setting out how these views were selected.	No change
Historic Environment	We advise would the inclusion of a specific policy on the historic environment including archaeology, and that the policy wording should reflect the policy set out in the National Planning Policy Framework to conserve heritage assets both designated, Listed Buildings, Conservation Areas, Scheduled Ancient Monuments Registered Parks and Gardens and Non designated heritage assets including their setting in a manner appropriate to their significance. It is also advised to have a map of all these heritage assets clearly identified.	Noted, changes have been made to policies HE1 and HE2. There is no need for a general policy as this is covered in the Local Plan as set out in paragraph 10.3	Changes made to HE1 and HE2
Conservation Area and its settings	It is good to hear that a recent assessment of the conservation area has taken place and would urge the early adoption of this important document to help inform future planning decisions and other potential place shaping initiatives.In terms of clarity it is advised to include reference to the relevant design code within the policy.	Noted, but the CA document is being produced by SCC	No change

Policy HE2- Local Heritage Assets	We welcome reference within the plan to locally significant Non-Designated Heritage Assets identified in Appendix D and the accompanying Policy HE2. We support the use of local listing to identify those heritage assets that are valued locally but either do not meet the criteria for national designation or have not previously been considered for such protection. We recommend that the formal identification of such non-designated heritage assets is informed by testing against criteria set locally and a brief examination of each site's heritage interest should be added to Appendix D in order to ensure they merit consideration in planning for their significance and to inform future decisions to sustain or enhance this significance. The list should also include any sites of interest recorded on the local Historic Environment Record (HER): We refer you to our advice on local heritage listing for further information: https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7	This guidance has been used to inform the NDHA list at Appx D. There is a separate background document explaining the selection of them.	No change
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National Trust

Policy ND4	Policy ND4 of the draft plan expresses support for the redevelopment of the Coopers Hill site for residential purposes subject to such development being in accordance with the quantum of development, design concept and principles set out in the Masterplans document and the design codes. Whilst the National Trust has no objection in principle to the proposed redevelopment it wishes to see the draft plan acknowledge the close proximity of the site to Runnymede and the need to ensure that development on the site precludes any adverse impacts on the National Trust land and interests – this includes impacts on trees and woodland, biodiversity (including Langham Ponds SSSI), hydrology and drainage, the wider landscape and the setting and significance of heritage assets on the Runnymede site. Of particular concern is the potential impact for natural springs on the Coopers Hill site to be harmed by the development resulting in adverse impacts to streams which cross the Runnymede site and flow into the Thames – this issue should be addressed in the draft plan.	Noted, this is a detailed matter that will be dealt with through the Local Plan Allocation 8.22 Reference added to the NT site at
Policy ND5	In addition, the Trust would like to see Policy ND5 of the draft plan include a height limit on new buildings of, say, three storeys so as to ensure that they are not visible from Runnymede. It seems likely that the redevelopment of the site for housing would increase the footfall on the paths into Runnymede from Coopers Hill. Whilst the Trust would welcome local residents accessing the Runnymede site for recreational purposes there could well be greater wear and tear on footpaths which would place an additional maintenance burden on the Trust. To address this burden the Trust would expect the Local Planning Authority to secure a financial contribution towards the additional maintenance costs. Reference to this issue could usefully be included in the draft plan.	This is considered to be too prescriptive and there is not sufficient evidence to back up this requirement. The Design Code sets out the considerations for new buildings No change Noted, but this is a detailed matter for the Local Plan allocation and planning application process No change

