

Email: [REDACTED]



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

Environment, Transport,  
and Infrastructure  
Spatial Planning Team

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Sent by email to: [REDACTED]

4 April 2023

Dear Sir or Madam

**Surrey County Council Response to the Englefield Green Village Neighbourhood Plan Submission Consultation (Regulation 16)**

Thank you for consulting Surrey County Council on the Englefield Green Village Neighbourhood Plan. This is an officer response and our comments set out below relate to Surrey County Council's (SCC) roles and responsibilities.

Minerals and Waste

In our response to the Englefield Green Village Neighbourhood Plan Regulation 14 Consultation (dated 24 October 2022), we raised concerns relating to the Mineral Safeguarding Area (MSA) to the west of Englefield Green Village, SCC functions as the Minerals and Waste Planning Authority (MWPA), and the relevance of local planning documents.

In this regard, we welcome the acknowledgement of a MSA for concreting aggregate to the west of Englefield Green Village on page 16 of the Englefield Green Village Neighbourhood Plan (January 2023). We seek to safeguard MSAs from other development that would sterilise the underlying mineral resource as per Policy MC6 of the Surrey Minerals Plan. Further to this, we welcome the acknowledgement of SCC's minerals and waste planning function and the relevance of the Surrey Minerals Core Strategy Development Plan Document (2011) at section 2.6 Neighbourhood Plan. As our original concerns have been addressed, we have no further comments to make in relation to minerals and waste.

Heritage

In our response to the Regulation 14 Consultation, we referred to the work which is currently underway on the Conservation Area Assessment and Management Plan (CAAPM) for the Englefield Green area and that there are a few references to this document within the Neighbourhood Plan. We suggested that 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. The CAAPM is now largely complete but needs to proceed through a number of approval stage and hence its publication is not imminent.

Our most significant concern is still the suggested Local List of non-designated Heritage Assets (NDHA) 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. We note the Englefield Green Village Neighbourhood Forums response to our Regulation 14 comments that the list of NDHA has been thoroughly checked and owners notified. There are prescribed national criteria for including a structure, site or feature on a Local List. Our view is that some of the suggested entries in the Englefield Green Neighbourhood Plan version may not satisfy these criteria, and this risks damaging the value of Local Listing overall as their status on a list would have diminished planning weight if it came to detailed scrutiny. We would recommend that the Forum discuss the list with Runnymede Borough Council and to reflect the “official” District Local List in their Neighbourhood Plan, or to demonstrate clearly that the additional features/buildings they have selected satisfy the [national guidance](#). It’s worth noting that paragraph 23 of this guidance allows for Neighbourhood Plans to create bespoke Local Lists, but they should still reflect the appropriate assessment and selection process.

The revised policy HE2 about Locally Listed sites will in our view be adversely affected by the significance of the heritage assets in question and whether they have been assessed with the appropriate rigour beforehand, as set out above.

#### 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. In SCC’s response to the Regulation 14 Consultation, we suggested 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. We suggested that 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.’*

We note the Forum’s response that the text has been amended slightly in Policy CF2 to allow for exceptional need for the schools and that the text now states, “The areas listed above are protected from new development unless very special circumstances can be demonstrated or if the proposal is consistent with the exceptions to Green Belt policy as set out in the NPPF”.

Our understanding is that the proposed Local Green Spaces are within the village boundary and not within the Green Belt. Therefore, the suggested change of wording is not appropriate because the sites are not in the Green Belt. Our recommendation is that reference should be made to Policy SL27 of the Runnymede Local Plan as the wording is more appropriate and reflects the situation.

I hope these comments are helpful. If you require further information, please contact Nikki Nicholson at [REDACTED]

Yours sincerely,

[REDACTED]

Nikki Nicholson  
Principal Planning Officer