

New Runnymede Local Plan



Topic Area 2: Climate Resilience & Nature

Background

- 3.1 Local planning authorities have a duty under the Climate Change Act to ensure that planning policy contributes to the mitigation of, and adaptation to, climate change; and a duty (introduced by the Environment Act) to conserve and enhance biodiversity, helping to drive nature's recovery.
- 3.2 Runnymede contains several protected habitats within, and adjacent to its boundaries, including those designated internationally, nationally and locally. Not all habitats or areas of refuge for wildlife are protected, with many to be found in our local green spaces, rivers, streams and local watercourses.
- 3.3 The Runnymede Place Portrait¹ describes the area's natural environment in more detail, how it has changed over time, and how the area may be affected in the future by a changing climate.

What has changed since the 2030 Local Plan

- 3.4 The existing 2030 Local Plan contains several policies aimed at addressing climate change. However, these policies were prepared and adopted before the Council declared a climate emergency, and we now have evidence that suggests that stronger action is needed if we are to meet our net zero targets - particularly in the built environment where some of the Borough's highest emissions are generated (e.g. from transport, heating buildings, and the carbon footprint of the building materials).
- 3.5 However, the new NPPF has also been introduced, which contains several National Decision-Making Policies (NDMPs) which aim to support the transition to net zero and increase resilience to climate change. NDMPs also aim to minimise risks to development arising from various sources of flooding; and to influence the design and location of new development to conserve, enhance and safeguard the natural environment and designated habitats. Whilst Local Plans can still contribute to these aims, the scope of what Local Plans can do has been reduced.
- 3.6 The Building Regulations have also been updated (coming into force in March 2027) to implement the Future Homes and Buildings Standards, which aim to ensure that new homes and non-domestic buildings are built with low carbon heating and high levels of energy efficiency. Whilst the standards do not achieve 'net zero' buildings, it is anticipated that buildings constructed to these standards will not require retrofitting to become zero carbon as the electricity grid decarbonises.
- 3.7 The Environment Act 2021 has also come into effect which places a duty on local authorities to conserve and enhance biodiversity. The Act also requires preparation of a Local Nature Recovery Strategy (LNRS - Surrey's strategy can be found [here](#)) and a

¹ Available at: www.runnymede.gov.uk/runnymede-digital-place-portrait

requirement for development to deliver at least 10% Biodiversity Net Gain (BNG). The Surrey LNRS identifies priorities for nature recovery, maps the most vulnerable areas for nature, and sets out specific proposals for creating and improving habitats.

- 3.8 The NPPF continues to advise that development in the areas at the highest risk of flooding should be avoided. However, there have been other significant changes to national flood risk policy, including a change in the definition as to what constitutes the 'functional floodplain'. This change has resulted in more land being defined as functional floodplain and consequently considered unsuitable for development than was previously the case. In addition, the Environment Agency has updated the way in which they produce flood maps, and their new mapping reflects the expected impacts of climate change.
- 3.9 Finally, since the 2030 Local Plan was adopted, our existing Suitable Alternative Natural Greenspaces (SANG) – which mitigates the impact of new development on the Thames Basin Heaths Special Protection Area – has dwindling capacity to accommodate new development.

What we think is in scope

- 3.10 NDMPs set out several requirements which development proposals should take into account in order to contribute to climate change mitigation and adaptation, and will help achieve the objectives of the Council's [Climate Change Strategy](#) and national net zero targets. For example, proposals are expected to be located where a choice of sustainable transport modes exists, and to be designed to conserve energy and avoid overheating.
- 3.11 The NPPF is clear on how Local Plans can expand on these, as explained in the box below. Given the cross-cutting nature of climate issues, policies which contribute to climate change mitigation and adaptation are likely to feature in various chapters throughout the new Local Plan.

Local planning policies can help contribute towards mitigating and adapting to climate change in Runnymede in the following ways:

- Proposing development patterns through a spatial strategy and site allocations which can help contribute to significant reductions in greenhouse gas emissions e.g. by considering the distribution and location of development to reduce the need to travel and maximise opportunities to travel by foot, bike or public transport.
- Avoiding increased vulnerability and improving resilience to the effects of extreme weather and long-term climate trends such as heatwaves, wildfires, drought and flood risk e.g. by locating new development to minimise the risk of flooding (taking into account climate change predictions for increased fluvial, groundwater and surface water flood risk).
- Addressing specific risks from climate change in proposed allocations for development, and necessary adaptations, both of which should be considered for the anticipated lifetime of the development.
- Setting stronger energy and water efficiency standards for new development where they have a clear and robustly costed rationale and will not have an adverse impact on the viability and deliverability of development. The existing 2030 Local Plan set the higher water efficiency standard for new dwellings, and it is anticipated that the next Local Plan could do the same, taking into account

the significant future shortfall of water resources anticipated in the area (described in the latest [Water Resources Management Plan](#)).

- Identifying opportunities for green infrastructure provision and nature-based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of the Surrey Local Nature Recovery Strategy (see below for more details).
- Support the transition to clean power by making provision for new/enhanced renewable and low carbon energy development and associated infrastructure e.g. water supply and electricity infrastructure, and setting out measures to avoid constraints on the operation/future expansion of this infrastructure (although this may be better addressed at a sub-regional scale by Spatial Development Strategies).

3.12 The NPPF also contains a number of NDMPs which set out how proposals should contribute positively to the natural environment and support nature's recovery. Local Plans and accompanying strategies such as the [Surrey LNRS](#) or [Thames River Basin Management Plan](#) can expand on these in various ways, as set out in the box below.

Local planning policies in association with other evidence at the most appropriate level (e.g. Local Nature Recovery Strategies or River Basin Management Plans) can help drive nature's recovery and contribute to wider environmental outcomes in the following ways:

- Set out the hierarchy of sites/areas of importance for their landscape, geological, or biodiversity value in the area.
- Identify opportunities for conservation, enhancing and recovery of landscapes, sensitive waterbodies, habitats and valuable biodiversity e.g. through the use of nature-based solutions, as described in the Surrey Local Nature Recovery Strategy.
- Steer the location of development, including through site allocations, in ways that use land of least environmental value e.g. away from Runnymede's limited amounts of higher quality agricultural land.
- Set out standards for green infrastructure and outdoor recreational provision (including allotments), and potentially site-specific Biodiversity Net Gain standards which exceed national requirements where justified by evidence.

3.13 In Runnymede, additional land will also be required for general recreation to avoid impacts of development on the Thames Basin Heaths Special Protection Area, known as SANG land. This will be an important consideration for any sites the Local Plan may allocate for development, especially sites which, if released from the Green Belt, must provide or improve existing open space as required by national planning policy.

3.14 The risk of flooding remains one of the key constraints to development in the Runnymede area, with areas in the east of the Borough at the highest risk of flooding (see the Runnymede Place Portrait² for more details). Flood risk is likely to increase as the climate changes. Whilst NDMPs will now set out policy requirements for decision-

² Available at: www.runnymede.gov.uk/runnymede-digital-place-portrait

making in order to ensure development avoids the areas at highest risk of flooding, the 'sequential approach' will need to be applied in selecting suitable sites for allocation (to help ensure that development is steered to the lowest risk areas).

- 3.15 There is also scope to set out policy requirements for development proposals situated on 'dry islands' – our monitoring records indicate that this can be a key issue for new development in certain areas in the east of Runnymede. During a flood event, a dry island would remain free from flooding itself, but would be surrounded entirely by land at a higher risk of flooding, and this would affect the ability of occupiers to safely evacuate in a flood event.
- 3.16 We are currently undertaking a Strategic Flood Risk Assessment to inform the next Local Plan, working closely with the Environment Agency and Surrey County Council (the lead local flood authority for the area).

What we think is out of scope

- 3.17 In summary, we believe the following matters are out of scope:
- For stand-alone development proposals, policies which require applicants to demonstrate a *need* for renewable or low carbon energy, electricity or water infrastructure where they come forward outside areas which have been identified as suitable for them.
 - Policies for dealing with flood risk including application of the sequential and exceptions test, site specific flood risk assessments and sustainable drainage systems (SuDS), as these policy requirements are now addressed by NDMPs.
 - Other than for specific site allocations, policies which require BNG from developments at more than the statutory 10%, or from sites exempt from BNG.
 - Other than the Thames Basin Heaths Special Protection Area, policies for protecting or enhancing international, national or local sites of nature conservation importance and irreplaceable habitats, as these are now addressed by NDMPs.

The following questions are set out in the response form³:

Q5. Do you agree with what the Council believes is in scope for this matter and which a new Local Plan should address? If not, please explain why.

Q6. Do you agree with what the Council believes is out of scope for this matter? If not, please explain why.

Q7. Are there any further locally specific approaches or measures that should be considered in the development of the next Local Plan to address the impacts of climate change?

Q8. Are there any further locally specific approaches or measures that should be considered in the development of the next Local Plan to protect and enhance the natural environment, and help drive nature recovery?

³ Available at: www.runnymede.gov.uk/local-plan/scoping