Runnymede 2030 Local Plan Examination

Responses to the Inspector’s Matters and Questions for the Stage 2 hearings (matter 11)
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Appendices

Appendix 5 - Proposed modifications to Policy EE1

Appendix 6 – Proposed modifications to policies EE14 to EE19
11.1 Does the Plan as a whole make sufficient provision for inclusive design and accessible environments, consistent with national planning policy, including paragraphs 57, 58, 61 and 69 of NPPF 2012? Are there any amendments that it might be helpful to make to the Plan in the light of NPPF 2018’s policy on these issues? Is Policy SD1 consistent with the presumption in favour of sustainable development as set out in NPPF 2018?

11.1 Policy EE1 of the Plan requires development to be of a high quality design and sets out a number of criteria to achieve this including, and in combination with Policy SD8, making provision for inclusive design and accessible environments. Policy EE1 is also effective when coupled with Policy SL19 in ensuring a high standard of amenity for existing and future occupiers and Policy SL1 in supporting development to assist people to lead healthy lifestyles.

11.2 Bullet 7 of Policy EE1 requires development to deliver layouts which offer safe, attractive, legible and permeable routes for all users which link people with places through a choice of active and sustainable travel and Policy SD8 requires residential development to achieve accessibility to M4(2) or M4(3) standard. Some of the allocation policies also require the provision of on-site Gypsy/Traveller pitches which is consistent with paragraph 69 of the NPPF 2012 (para 91 of the NPPF 2018) by promoting social interaction, including through providing opportunities for meetings between people who might not otherwise come into contact with each other.

11.3 However, on reflection the Council considers that Policy EE1 could go further to promote inclusive design, and that some criteria of the Policy are too prescriptive where this can be left to other planning documents (such as the Council’s Design Supplementary Planning Document (SPD) that is currently being prepared) or Neighbourhood Plans. Policy EE1 and its supporting text could also be strengthened to align more closely with paragraphs 91 and 125-129 of the NPPF 2018, in particular regarding community involvement in the design process, the role of design review panels, the links with health & well-being and impact of proposals on landscape settings.

11.4 Paragraph 125 of the NPPF 2018 states that Plans should, at the appropriate level set out a clear design vision and expectations at an early stage. The Plan’s vision includes achieving a ‘high quality and inclusive built environment’ and objective 11 aims to
revitalise areas in need of physical improvement and enhancing the built environment. The Council is preparing a Design SPD which is intended to support decision making, and to support developers and promoters of land in taking a design-led approach to site planning. It will also have a role in helping the community to understand the issues considered in decision making and in ensuring that land is being delivered with a consideration to Runnymede’s distinct characteristics and identity. The Design SPD will also emphasise that the public environment of new developments should consider the needs of all users in the design of the public realm.

11.5 The Council’s Design SPD will also set out a more detailed design vision for the Borough. The precise wording for this remains a matter for discussion and finalisation, but will draw upon the research completed in preparing the guide, alongside the insights gained from workshops held at the outset. The vision will be honed through future consultations of the Design SPD.

11.6 The Council therefore proposes modifications to Policy EE1, the supporting text in paragraph 7.3, and inclusion of a new supporting paragraph which better align with the NPPF 2018. The proposed modifications are set out in Appendix 5.

11.7 When considering the final part of the Inspector’s question, Policy SD1 is considered to be consistent with the presumption in favour of sustainable development as set out in the NPPF 2018 and is based on what the Council understands to be model wording encouraged by Planning Inspectors at other Local Plan examinations.
11.2 Are the requirements of Policies SD8 and SD9 justified, consistent with national planning policy, and deliverable?

11.8 The requirements of Policies SD8 and SD9 are considered to be justified, consistent with national planning policy and deliverable.

11.9 In particular, the criteria set out in Policy SD8 are considered to be justified given their consistency with paragraphs 30, 35, 57, 93, 94, 95, 96, 109 of the NPPF 2012 (paras 102, 105, 110, 127, 149, 150 & 174 of NPPF 2018) and will be deliverable through the design of individual developments. Situations where additional justification is required through evidence and where elements of the policy have cost implications are considered below.

11.10 Criteria d) - The Surrey County Council Parking Standards guidance¹ sets out requirements to provide electric vehicle charging points in new development and criteria d) expects these to be complied with unless it is not feasible to do so. The cost of incorporating Electric Vehicle (EV) charging points has been tested through the Local Plan Viability Report (SD_013B) with no detrimental impact on viability found. The criteria is therefore justified and consistent with paragraph 35 of the NPPF 2012 (para 105 of NPPF 2018) and will be deliverable through the design of individual developments subject to feasibility.

11.11 Criteria e) - Paragraph 14 of the Government’s Optional Technical Housing Standards states that where there is a clear local need, planning policies can set out water efficiency requirements to meet the tighter Building Regulations of 110 litres/person/day. Supporting evidence for this can come from consultations with local water/sewerage companies and the Environment Agency as well as testing viability implications. Table 3.1 on p15 of the SA Scoping Report (SD_018A) highlights pressure for water abstraction and need to reduce water use as an issue for the Plan. Consultation with the Environment Agency and Thames Water at Regulation 18 stage revealed that the south east of England is an area of ‘serious’ water stress with both organisations recommending the plan incorporate the optional technical housing standard on water efficiency. The Council’s Local Plan Viability Report (SD_013B) tested the viability of applying the water efficiency standard and found that the costs of doing so would not prejudice the viability of development. The criteria is therefore justified and consistent with paragraph 94 of the NPPF 2012 (para 149 of the NPPF

¹ Parking Guidance for Development (2018) SCC.
and deliverable through the design of individual developments.

11.12 Criteria f) - Paragraph 007 of the Government’s Optional Technical Housing Standards states that based on their assessment of housing needs it will be for local planning authorities to set out their approach for demonstrating the need for higher accessibility standards. Table 71 on p85 of the Council’s partial update of the Strategic Housing Market Assessment (SD_006C) identifies a 32.6% increase in the population aged 65+ over the Plan period or 4,830 persons according to Table 73 on p85. Table 77 on p88 shows a 37.2% increase in the population with mobility issues and Table 79 on p90 a 24% increase in those with a long term health problem or disability. Whilst the Council acknowledges that a proportion of the population with accessibility issues will have their needs met by C2 uses, adult social care policy is to give more control to the individual to meet their care needs with a shift away from residential care\(^2\). As such, the requirement for accessible dwellings at standard M4(2) is justified and consistent with paragraph 50 of the NPPF 2012 (paras 61 & 127 of NPPF 2018) and will be deliverable through the design of individual sites.

11.13 Whilst the residual housing target would see a potential 4,554 dwellings delivered with accessibility to M4(2) standard which is higher than the projected population of 65+ or people with disabilities, this is considered justified because:

- Implementing higher standards of accessibility will help to achieve the Plan’s vision of achieving a ‘high quality and inclusive built environment’
- It future proofs a percentage of the Borough’s housing stock for people with mobility issues beyond the plan period and gives choice for individuals;
- Criteria f) is subject to feasibility and there will be sites which cannot meet or only partially meet the requirement due to site conditions;
- Whole Plan viability assessment (SD_013A & B) and the Longcross Garden Village Infrastructure & Viability Assessment (SD_007P) do not raise any viability concerns with implementing the accessibility standard.

11.14 In terms of wheelchair adaptable or accessible dwellings Table 81 on p92 of the SHMA estimates a total need for 337 wheelchair user dwellings over the plan period. At 5% of the residual housing target this would amount to 240 dwellings which although lower

than projected need still makes a significant contribution to wheelchair accessible dwellings. The requirement for the M4(3) accessibility standard is therefore justified and consistent with paragraph 50 and 57 of the NPPF 2012 (paras 61 & 127 of NPPF 2018) and is also flexible in its approach to the percentage meeting M4(3) standards for wheelchair adaptable and wheelchair accessible dwellings. The requirement for 5% of new housing to deliver the M4(3) standard was tested in the Whole Plan Viability Assessment (SD_013B) which did not raise any viability concerns with implementing this accessibility standard. Policy SD8 is therefore considered to be deliverable through the design of individual sites.

11.15 In terms of Policy SD9, this is considered to be justified by and is consistent with paragraphs 93, 95 & 97 of the NPPF 2012 (paras 150, 151 & 152 of the NPPF 2018).

11.16 The Council has previously implemented a Renewable Energy Interim Advice Note\(^3\) in support of the now revoked South East Plan Policy NRM11, for development to provide 10% of its energy needs from renewable sources. The Council did not encounter any issues or problems in the delivery of this expectation and as such, the incorporation of renewable or low carbon technologies into development is expected to be feasible in the great majority of cases.

11.17 Furthermore, the 10% renewable energy requirement contained in Policy SD9 has been subjected to Whole Plan Viability Testing (SD_013A & B) with no viability issues raised and is considered deliverable in this respect.

11.18 Policy SD9 also requires large scale developments to explore connection with existing or provide new decentralised\(^4\), low carbon or renewable energy networks where it is feasible and viable to do so. Whilst the Council has not tested the feasibility or viability of this requirement itself, the Council has recently provided decentralised low carbon energy through use of Combined Heat and Power (CHP) at the Addlestone One development and as part of the redevelopment of Egham Leisure Centre and as such considers such technologies at this scale of development to be deliverable. However, Policy SD9 recognises that this will need to be considered on a site by site basis and explored through an energy statement.

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\(^3\) Renewable Energy Interim Advice Note (2010) RBC. Available at:  
\(^4\) As defined in Annex 2 of the 2012 or 2018 NPPF
11.3 Read in the context of the Plan as a whole, do Policies EE1-EE9 provide a sound framework for the protection the Borough’s natural and built environment and the health and well-being of individuals and communities?

11.19 Policies EE1-EE9, when read in the context of the Plan as a whole are considered to provide a sound framework for the protection of the Borough’s natural and built environment. See the Council’s response to Matter 11.1 regarding Policy EE1.

11.20 Policy EE2 sets out the framework for protection to and from development for a range of potential pollution sources including air quality, noise, land contamination and light. The policy has been developed with the aid of the Council’s Environmental Health Team and is consistent with paragraphs 120-125 of the NPPF 2012 (170, 178-182 NPPF 2018). The SA Scoping Report (SD_018A) recognises the impact of traffic and congestion on air quality and noise levels as issues for the Plan. As such Policy EE2 is justified on this basis.

11.21 The Policy requires development to take account of its impact on the natural environment and local amenity and requires measures to abate or mitigate impacts to acceptable levels as necessary. Acceptable air quality standards are set out in the Government’s national air quality objectives\(^5\), noise limits are set out in the Government’s Noise Policy Statement for England\(^6\) and the PPG Note noise and for land the standard is to not meet the statutory definition of contaminated land as set out in Part IIA of the EPA 1990. Meeting acceptable standards for air quality, noise and land contamination will help to protect the health & well-being of individuals and communities. The Policy does not make reference to these standards directly as they may be amended in the future and render the Policy out of date. Therefore reference to ‘acceptable’ standards will ensure that the latest standards are adhered to and health & well-being protected.

11.22 Policy EE2 has also responded to comments raised at Regulation 18 or the Stage 1 Regulation 19 Plan by:
- Including reference to groundwater as requested by the Environment Agency;
- Including reference to odour as requested by Thames Water;
- Setting out that development in proximity to existing sources of pollution need to take account of this and secure appropriate mitigation, as requested by Thorpe Park Ltd.

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\(^5\) National Air Quality Objectives, DEFRA. Available at:

\(^6\) Noise Policy for England, DEFRA. Available at:
11.23 Policies EE3-EE8 are considered to form an effective framework for the protection and enhancement of the historic environment. The suite of policies has been developed in cooperation with Historic England and Surrey County Council’s conservation officer. The policies are considered to be consistent with paragraphs 126-141 of the NPPF 2012 (paras 184-192 of NPPF 2018) with the SA Scoping Report identifying a need to protect the fabric and setting of the Borough’s conservation areas and heritage assets as an issue. Policies EE3-EE8 are therefore considered to be justified on this basis.

11.24 Policy EE9 seeks protection and enhancement of biodiversity features and designations, having regard to the status of the feature within the hierarchy of protected sites. Policy EE9 also has regard to the hierarchy of ‘avoid, mitigate and compensate’. This is consistent with paragraphs 117-119 of the NPPF 2012 (paras 170, 171, 174-177 of NPPF 2018) and the SA Scoping Report which identifies recreational pressures and habitat fragmentation as issues for the Plan. Policy EE9 is considered justified on this basis.

11.25 The Spatial Strategy set out in Policy SD2 aims to deliver a sustainable pattern of development which makes the fullest use of active and sustainable forms of travel and Policies SD4 and SD5 require Transport Assessments and Travel Plans. There are a number of allocation sites in the Plan which are located in close proximity to potential pollution generating sources and the individual allocation policies recognise this and require evidence of impact and mitigation where necessary to protect the health & well-being of new and existing residents. Reference to Policy EE2 is not made in the allocation policies as the Plan should be read as whole and the consideration of any impact will need to be in accordance with Policy EE2.

11.26 In addition to the policies referred to in the Inspector’s question, Policy EE10 seeks protection of the Thames Basin Heaths SPA, EE11 the enhancement of the green infrastructure network and EE12 protection of blue infrastructure. Site allocation policies including SD10 also require development to protect the Thames Basin Heaths SPA, protect and enhance existing on-site natural features, and provide or contribute towards green infrastructure and landscape quality.

11.27 When read in the context of the Plan as a whole, Policies EE1-EE8 form an effective framework for the protection of the natural and built environment and the health and
well-being of individuals and communities.
11.4 Are Policies EE14-EE19 for management of development in the Green Belt justified, consistent with national planning policy, and likely to be effective?

11.28 It is noted that the Inspector has confirmed that the policies in the Plan will generally be considered against the NPPF 2012. However, in a few discrete areas, particularly in respect of policies regarding development in the Green Belt, it is considered appropriate, in the interests of the future-proofing of the Plan policies and to make them effective for development management purposes, to make a number of minor alterations to improve clarity, remove identified duplication and to ensure consistency with the terminology of the NPPF 2018. The proposed modifications to these policies can be viewed in appendix 6.

11.29 Chapter 13, paragraphs 133-147 of the NPPF 2018 deal with development proposals in the Green Belt. The chapter sets out the fundamental aim of Green Belt policy is to keep land permanently open and lists the five purposes of the Green Belt. For development management purposes, paragraphs 143 to 147 are relevant setting out the principle that inappropriate development is by definition harmful and very special circumstances will need to exist to clearly outweigh harm to the Green Belt. Paragraphs 145 and 146 set out the circumstances where new buildings and other forms of development may not be inappropriate.

11.30 Policies EE14 to EE19 (including the suggested modifications set out in appendix 6), are considered to be consistent with national policy in NPPF 2018 and are considered to be fully justified due to specific local circumstances experienced in Runnymede. The policies are intended to provide the local toolkit for decision makers and provide the clarity for developers and other parties of the local interpretation of the NPPF 2018. These policies therefore focus on the most common forms of development proposals experienced within the Green Belt areas of the Borough, consistent with the approach of paragraphs 145 and 146 of the NPPF 2018.

11.31 Policy EE14 rolls forward an existing development plan policy (Saved Policy GB6 of the Runnymede Borough Local Plan Second Alteration, 2001) commonly used for development management purposes. Policy EE14 has been updated (with minor alterations proposed to ensure consistency with the NPPF 2018) to reflect the variety of circumstances of buildings in the Borough which have an unusually high frequency of extension or complete rebuilding. The policy is also required to acknowledge the
fast changing trends experienced in the Borough such as the preference in some parts of the Borough for neo-classical flat roof buildings with large bulky forms compared with the traditional style buildings with pitched roofs.

11.32 Existing policy GB6 is silent regarding basements and flood resilience measures including raising floor levels/height of buildings to ensure future occupiers are not at risk of flooding. There is a large area of the Borough that is subject to both Green Belt constraints and falls within flood zones 2 and 3. In the Council’s experience, large basements and raising of floor levels have implications for the prominence of buildings and consequently can result in substantial harm to the openness of the Green Belt. Policy EE14 is necessary because it addresses these local characteristics which may not be unique across the country but certainly provides a very localised and complex set of circumstances in Runnymede. The policy will be effective because of the combined consistency with the NPPF and because it seeks to provide a toolkit which provides certainty but flexibility, being applied to all development proposals no matter the site circumstances and planning history.

11.33 Policies EE15 and EE16 are consistent with the NPPF and are necessary to provide local interpretation of impact of proposals on the Green Belt to reflect local circumstances in order to inform development management decisions and also planning enforcement decisions. Policy EE15 will be effective as it refers specifically to lawful buildings, due to the local experience that the Council has of landowners seeking to promote proposals relying on unlawful buildings/floorspace to justify inappropriate development. The effectiveness of the policy is also derived from the local criteria being applied.

11.34 Policy EE16 (as proposed with minor modification) is also necessary as it is reflective of local circumstances in the Borough, and the development management and planning enforcement teams experience of high numbers of development proposals for recreation use, including equestrian related development, which can have a substantial impact on the openness of the Green Belt, not least from the ancillary/associated works. The policy will be effective in that it identifies specific aspects of recreational development that can cause harm and its application will ensure development proposals do not cause such harm.

11.35 Policy EE17 is necessary to provide a local interpretation of paragraph 145g of the
2018 NPPF as the Borough has a wide range of types of sites comprising previously developed land, including large healthcare, education, and commercial sites, as well as fringe sites with varied planning and enforcement histories. The policy is also justified as the existing 2001 Local Plan identified only major sites in line with former national planning guidance, but paragraph 89 bullet 6 of the NPPF 2012 introduced the new approach of partial or complete infill or redevelopment of any previously developed land. Policy EE17 is consistent with the NPPF 2018 but as in the case of EE14, provides the detailed considerations to reflect the range of PDL in the Borough and the type of application proposals commonly submitted. It is considered the policy will be effective as it will provide the toolkit for development management decisions, being flexible to be able to address all types of PDL sites whilst providing a consistency of methodology in assessing PDL development proposals. By adopting this approach, there is confidence that the objectives of the NPPF 2018 will be achieved.

11.36 Policies EE18 and EE19 reflect Borough circumstances of a high volume of development pressures arising from engineering operations and material changes of use in the Green Belt; in many cases unlawfully, resulting in a significant planning enforcement caseload and high appeal caseload. The policies are consistent with the NPPF 2018 but due to these local circumstances, additional detail in the policies is necessary to guide development management decisions and planning enforcement decisions. As these developments commonly attract significant public interest and objection, these policies will be effective in assessing impact and informing decisions, as well as providing public confidence in the planning system to uphold the objectives of the NPPF 2018.

11.37 The Council considers that other elements of Green Belt policy not included in the policies EE14-EE19 are adequately covered by national policies in the NPPF.
Appendix 5: Proposed Modifications to Policy EE1: Townscape and Landscape Quality and supporting paragraph 7.3 & new paragraph 7.4

7.3 Runnymede’s Urban Character Appraisal (2009) and the Surrey Landscape Character Assessment (2015) set out the general characteristics of Runnymede’s townscape/landscape and how development can be sympathetic to and/or mitigate its impact. The Council are also preparing a Design SPD for the whole of Runnymede Borough which when adopted will support the implementation of Policy EE1 and other policies in the plan where they have a design implication. Urban Character Appraisal and Landscape Character Assessment will be used in the preparation of a general or specific design SPD, which may include elements of design coding to inform how development should consider design elements.

7.4 In considering proposals, including at pre-application stage, the Council is committed to making use of Design Review Panels as appropriate to ensure design quality is achieved. The Council’s pre-application charging schedule and Design SPD will set out when a Design Review Panel will be appropriate. The Council also strongly encourages applicants of major developments to carry out early engagement with the local community.

Policy EE1: Townscape and Landscape Quality

Whether within the Borough’s urban areas or Green Belt, all development proposals will be expected to achieve high quality and inclusive design which responds to the local context including the built, natural and historic character of the area while making efficient use of land. Taking account of their impact at the earliest opportunity. Development proposals will be supported if they: In particular, development proposals will be supported where if they:

- Create attractive and resilient places which make a positive contribution to the Borough’s townscape, public realm and/or landscape quality by respecting and enhancing the local, natural & historic character of the environment setting and which will endure into the long term, paying particular regard to layout, form, scale, materials, detailing and any guidance set out in adopted planning documents including Neighbourhood Plans and the Council’s Design SPD;
- Create developments which promote social interaction and design out crime by maximising opportunities for natural surveillance, safe and attractive shared public spaces, active street frontages and legible & accessible connections
between people and places for pedestrian & cycling movement and access to public transport, local facilities, green and blue infrastructure;

- Reinforce locally distinctive patterns of development by paying particular regard to scale, layout, building lines, materials, massing, bulk, density, height and topography;
- Contribute to and enhance the quality of the public realm and/or landscape character setting through high quality and inclusive hard and soft landscaping schemes; This will be demonstrated and implemented through an appropriate landscaping strategy which takes account of existing and proposed townscape/landscape character and features;
- Ensure no adverse impact on the amenities of occupiers of the development proposed or to neighbouring property or uses and provide an appropriate standard of private amenity space;
- Provide an appropriate standard of private amenity space;
- Ensure maximum opportunities for natural surveillance and other measures to design out crime and disorder;
- Deliver layouts which offer safe, attractive, legible and permeable routes which are suitable for all users, linking people with places through a choice of active and sustainable travel choices delivered to best practice standards;
- Avoid the loss of trees and other vegetation worthy of retention and supplemented with additional high quality planting, or where retention is not feasible or desirable provide for high quality replacement planting;
- Have regard to relevant design codes or guidance set out in general or specific design Supplementary Planning Document, and through a Design & Access Statement demonstrating how design principles will be delivered. Development proposals will be expected to show the options considered through the early design process and reasons for rejected options and the preferred design.

Development proposals will be expected to take account of a scheme’s design at the earliest opportunity and demonstrate through the application process how design principles set out in this Policy and adopted planning documents have been met. For major developments, a Design & Access Statement should set out the design options considered through the design process and how these have evolved into the preferred design.
Policy EE14: Extensions and Alterations to and Replacement of Buildings in the Green Belt

The National Planning Policy Framework states that the construction of new buildings is inappropriate development in the Green Belt. Exceptions to this are:

a) The extension Proportionate extensions and/or alteration of a building is not inappropriate development provided that it does not result in disproportionate additions over and above the size of the original building, or to existing residential and non-residential buildings taking into account the potential impact on the openness and the purposes of including the land in Green Belt.

b) The replacement of a building is not inappropriate development provided the new building is in the same use and is not materially larger than the building it replaces nor cause significant harm to the openness and/or character of the Green Belt.

In all cases, development proposals should maintain openness of the Green Belt and not conflict with the purposes of including the land in the Green Belt.

In addition, new development should not materially increase the prominence of the development at the site.

When assessing a proposal with regard to harm to openness and whether it constitutes inappropriate development, the following considerations will be taken into account:

- The planning history of the site (post 1st July 1948) including any previous extensions or enlargements including previous works carried out under permitted development;
- The current lawful use of the existing building(s);
- The use of the proposed building(s)/extension;
- Existing and proposed floorspace including mezzanine levels, space under roofs and covered balconies;
- Alterations to Existing and proposed built footprint which may increase the spread and site coverage and reduce distances to boundaries or materially increase the prominence of the building;
- Changes in mass, bulk and height of buildings including roof form changes and features, and any raising off ground to provide voids/flood mitigation;
- Scale of buildings including from different aspects within and outside the site;
- Inclusion of features which may impact on openness including basements and sunken areas, light wells, changes to ground levels including any exposed parts of buildings and ramps;
- Other ancillary aspects of a development proposal such as garages and other outbuildings, walls and gates, areas of hardstanding and their use and external storage will be considered additionally in respect of the built envelope, function and linkages to the main dwelling. These may cumulatively have an unacceptable impact on the openness of the Green Belt.

Justification for inclusion of policy
1.1 The fundamental aim of Green Belt policy, as set out in the NPPF, is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence, and in Runnymede the Council will continue to exercise strict control over development within the Green Belt in accordance with national guidance in its Local Plan.

1.2 Policy EE14 will help to deliver Local Plan objective 10.

### Policy EE15: Re-use of Buildings in the Green Belt

The re-use of buildings in the Green Belt may not be inappropriate provided the buildings are lawful and of permanent and substantial construction, the proposal preserves the openness of the Green Belt and does not conflict with the Green Belt purposes. When assessing proposals for re-use, the following factors will be taken into account:

- The permanence and condition of the building. It must be capable of conversion without major or complete reconstruction;
- The relationship with surrounding land uses and implications for future uses;
- Extent of ancillary works or features such as external storage, hardstanding, car parking, boundary walling or fencing;
- Whether the proposal would restore/retain a building of architectural or historic interest;

### Justification for inclusion of policy

1.3 The fundamental aim of Green Belt policy, as set out in the NPPF is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence, and in Runnymede the Council will continue to exercise strict control over development within the Green Belt in accordance with national guidance in its Local Plan.

### Relevant Local Plan objectives

1.4 Policy EE15 will help to deliver Local Plan objective 10.

### Policy EE16: Outdoor Sport and Recreation in the Green Belt

In accordance with the National Planning Policy Framework, the provision of facilities for outdoor sport, outdoor recreation and for cemeteries, burial grounds and allotments may not be inappropriate in the Green Belt provided such provision preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. When assessing proposals, the following factors will be taken into account:

- the proposed building must be shown to be required and related to the lawful use of the land;
- proposals for stables/tack rooms must demonstrate the amount of development
proposed is reasonably related to its intended use and the amount of pasture land available for the use of the land; • proposals for maneges/all weather riding facilities will be expected to demonstrate the minimum required hard standing necessary for the facility, if this hardstanding is required.

Justification for inclusion of policy

1.5 The fundamental aim of Green Belt policy, as set out in the NPPF, is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence, and in Runnymede the Council will continue to exercise strict control over development within the Green Belt in accordance with national guidance in its Local Plan.

1.6 Policy EE16 will help to deliver Local Plan objective 10.

Policy EE17: Infilling or Redevelopment on Previously Developed Land in the Green Belt

The limited infilling or partial or complete redevelopment of previously developed land (excluding temporary buildings) is not inappropriate in the Green Belt providing there would be no greater impact on the openness of the Green Belt than the existing development. The following considerations will be taken into account:

• Lawful status of existing buildings and any hardstanding;
• General height and storeys of existing and proposed buildings and their disposition around/within the site;
• Existing and proposed floorspace and footprint;
• Existing and proposed hardstanding;
• Existing and proposed development envelope and amount of undeveloped areas;
• Relationship with existing landscape features and integration with surroundings including space within and around the development particularly close to boundaries and views from within and outside the site;
• Phasing of proposed development including any demolition proposed.

Justification for inclusion of policy

1.7 The fundamental aim of Green Belt policy, as set out in the NPPF, is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence, and in Runnymede the Council will continue to exercise strict control over development within the Green Belt in accordance with national guidance in its Local Plan.

1.8 Policy EE17 will help to deliver Local Plan objective 10.

Policy EE18: Engineering Operations in the Green Belt
Proposals for engineering operations including laying of roads and hardstanding, material changes in land levels and formation of bunds are considered inappropriate development unless the applicant has demonstrated that the operations preserve the openness of the Green Belt at the site and its vicinity, and do not conflict with the purposes of the Green Belt relevant to the proposal. The extent and visual impact of the changes in land levels will be taken into account in assessing such proposals, as will the purpose and intent of future use of the hardstanding in order to ensure the visual effects are not harmful.

Justification for inclusion of policy

1.9 The fundamental aim of Green Belt policy, as set out in the NPPF, is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence, and in Runnymede the Council will continue to exercise strict control over development within the Green Belt in accordance with national guidance in its Local Plan.

1.10 Policy EE18 will help to deliver Local Plan objective 10.

Policy EE19: Change of Use of Land in the Green Belt

Proposals for changes of use of land may not be inappropriate development per se but the change of use should have no greater impact on the openness of the Green Belt and the purpose of including land within it than the existing use. Furthermore, proposals for independent residential occupation use of land associated with husbandry of land or livestock are considered to be inappropriate development and harmful to the Green Belt in principle, including residential use associated with husbandry of land or livestock.

Justification for inclusion of policy

1.11 The fundamental aim of Green Belt policy, as set out in the NPPF, is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence, and in Runnymede the Council will continue to exercise strict control over development within the Green Belt in accordance with national guidance in its Local Plan.

1.12 Policy EE19 will help to deliver Local Plan objective 10.