By Email Only

Dear Sir/Madam,

RUNNYMEDE BOROUGH COUNCIL (RBC) LOCAL PLAN 2030: RUNNYMEDE 2030 LOCAL PLAN - MAIN MODIFICATIONS CONSULTATION

CBRE is appointed to act for Ashill on behalf of their land interests at Christmas Tree Farm (SLAA 284) and Stroude Farm (SLAA 13).

In accordance with the consultation statement, this response will focus only on the proposed Main Modifications. For each subheading we have set out which Main Modification is being responded to. Our response is focused on three principal issues, all of which either individually or collectively (if left unresolved) are matters of soundness for the Local Plan.

1. The exceptional circumstances, highways, landscape and heritage evidence supporting the assessment of Virginia Water North through the site selection process (SD_012B) is not justified or consistent with the NPPF and should be removed as an allocation in the Plan (MM29);

2. The approach taken to ‘A320 dependent’ allocations is not justified or effective (MM24, MM26, MM31, MM32, MM33, MM34, MM35, MM36, MM37, MM38);

3. The assumed housing contribution from Longcross Garden Village to 2024 is not justified (MM22).

The additional amendments that are required to the Local Plan being suggested within this response could be dealt with through a Main Modifications process and need not significantly delay the adoption of the Local Plan.

Main Modification 29 – Virginia Water North

The proposed Main Modifications to Virginia Water North do not, and cannot, resolve the fundamental soundness issues associated with this site. Such are the site constraints (see below) that the site allocation needs to be deleted and replaced with an alternative site as part of a Main Modifications process.

In addition to the issues presented below, we understand that covenant restrictions associated with development in the Wentworth Estate would preclude the site allocation from being delivered.

The soundness issues arise through the assessment of Virginia Water North in the Site Methodology Booklet (SD_012D – December 2017). As part of this process incorrect assumptions in terms of the site allocation’s impact on highways,
heritage and landscape grounds result in the site not being discounted at this stage but instead progressed as a reasonable option for development.

As detailed further below and supplemented by additional evidence appended to this response (see RPS Heritage Statement), the principal issue associated with Virginia Water North is a failure to adequately understand the access constraints associated with the site, most notably in (1) the way in which highways and heritage constraints result in significant landscape impacts in an identified landscape character area and (2) the unsoundness of the access solution proposed.

Paragraph 110 of the NPPF (2012) is clear that ‘Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.’ This has not been undertaken in respect of Virginia Water North with significant amendments required to the landscape character to facilitate the required access.

More fundamentally, Paragraph 32 (2012) states that ‘plans should take account of whether safe and suitable access to the site can be achieved for all people’. This requirement cannot be achieved for the site once access constraints in the form of (1) third party landownership and (2) insufficient visibility splays is considered. This is detailed further in the attached note but amounts to fundamental soundness issues with the allocation.

Table 1 below sets out RBC’s comments made in respect of Virginia Water North as part of the Site Selection Methodology Booklet (SD_012B – December 2017).

Table 1 – RBC’s Stage 3 and Stage 4 Assessment of Virginia Water North

<table>
<thead>
<tr>
<th>Stage 3 of Assessment (Page 43 of SD_012B)</th>
<th>Stage 4 of Assessment (Page 56 of SD_012B)</th>
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<tbody>
<tr>
<td>Virginia Water North</td>
<td>’Site within unit SW1 of SLCA and not considered to adversely affect landscape principles subject to careful design although account will need to be taken of principles and enhanced through design.’</td>
</tr>
<tr>
<td>‘Site accessibility is generally good to a range of local facilities. Accessibility to service centres is generally reasonable by rail/cycling but poor by bus given infrequent service. Limited significant non-absolute constraints include locally listed building on site, where harm could be avoided through design. Some steeper gradients on site could reduce developable area but not enough to exclude sites. Impact to adjacent SNCl could be avoided through design. Site scores Medium overall.’</td>
<td>’Site within unit SW1 of SLCA and not considered to adversely affect landscape principles subject to careful design although account will need to be taken of principles and enhanced through design.’</td>
</tr>
</tbody>
</table>

The conclusions reached above do not adequately account for landscape, heritage and highways constraints associated with the site. Whilst it is acknowledged that in many instances such issues can be resolved at the planning application stage, in the case of Virginia Water North these are fundamental issues that go to the soundness of the Local Plan.

The access issues associated with Virginia Water North are documented by other submissions, including Surrey County Council (SCC), but have never been fully tested during the Examination in Public (EiP) process. The SCC response from RBCLP_63 is reproduced below:

*Virginia Water – Merlewood Access* – This is on a private road outside of the jurisdiction of the County Highways Authority. However, having carried out a site visit it was noted that the proposed access is bordered by historic brick walls that limit visibility significantly. These could be removed/resited to improve views, or if this is not possible, there is sufficient space to move the carriageway to allow for a wider verge to improve visibility.

*VWN Kenwelde* – having looked at the proposed access on Callow Hill, I’m not sure if the visibility provided on the submitted plan can be achieved. The road gradient at the proposed location seems to preclude visibility, particularly at the minimum height of 1.05 metres that we would normally request for visibility splays. However, if the access is moved farther up Callow Hill (towards Kenwelde Lodge) then vertical visibility improves a lot and I don’t think horizontal visibility would be excessively compromised. So, I don’t think this
is going to right off the site, as the site extends along the edge of Callow Hill in either direction then the land allocation should be okay.’

Merlewood Access

As supported by the appended Heritage Note, the historic brick wall should be taken as an absolute constraint thus necessitating the need to move the carriageway to improve visibility.

RBCLP_63 is silent on the fact that to establish this access a significant number of trees within this landscape character area would need to be removed to provide the necessary visibility (refer to Vision Transport Note). The additional land needed for this access is also outside of the ownership of the applicant thus creating an absolute constraint on the ability for a safe access to be provided.

Whilst tree clearance in itself may not be seen as a strategic issue preventing the allocation of a site, Virginia Water North is located in SW1 of the Surrey Landscape Character Assessment (SD_009A). Key characteristics of SW1 include inter alia (SD_009A - Page 60 & 61):

- Extensive areas of deciduous and coniferous woodland and plantation, including areas of ancient woodland.
- Occasional scattered large houses, small groups of low-density dwellings along roads, and complexes of buildings, including the American International School. Buildings are contained within surrounding woodland and are not overly intrusive.

The extensive tree clearance that will be required to facilitate a safe access is not considered through SD_012B with it being concluded (above) that the allocation ‘is not considered to adversely affect landscape principles.’ Notwithstanding this the allocation, and associated required tree clearance, would not be consistent with the aims and objectives of the Local Plan which states:

‘To protect and enhance the Borough’s most valued landscapes and its green spaces as well as the general extent of the Green Belt.’

More pressingly, the allocation itself would be in conflict with the extent of changes to the access required. Policy SL9 states:
‘Retain trees which are significant either individually or as groups and take account of site boundary vegetation and built development strategy for unit SW1 of the Surrey Landscape Character Assessment in the design and layout of the site. This will need to be demonstrated and implemented through an appropriate landscaping strategy.’

Kenwolde Access

Firstly, ‘so I don’t think the site will be a right off’ (cite) as noted in RBCLP_63 does not constitute appropriate evidence on which to support the allocation of Virginia Water North. Akin to the comment made in respect of the Merlewood Access significant tree removal will be required to achieve the necessary access. Furthermore, if the advice from SCC is continued to move the access closer to Kenwolde Lodge this will result in heritage issues associated with the historic wall. Moreover, the appended Heritage Note from RPS confirms that Kenwolde House would meet the requirements for local listing.

From the above it is clear that the proposed access for Virginia Water North is significantly compromised and is unresolvable through a Main Modifications process or even through detailed consideration at the planning application stage.

In respect of landscape character, the allocation is at odds with the aims and objectives of the Local Plan. More fundamentally in the context of tests of soundness, adequate access cannot be provided to the site as required by Paragraph 32 of the NPPF (2012). The site allocation should be deleted to ensure soundness with a replacement site identified through the Main Modifications process.

Exceptional Circumstances Test

SL9 will see 19.5 hectares of Green Belt land released to accommodate just 120 dwellings, this results in a gross density of 2.5 dwellings per acre. Appendix C demonstrates how this would work out per parcel. The Local Exceptional Circumstances conclusions on Page 16 of SD_004Y is not justified. The housing delivery output from the site is not commensurate to the scale of harm that is created to the Green Belt through release and is not an efficient use of land.

Paragraph 85 of the NPPF (2012) states that when revising Green Belt boundaries local authorities should ‘ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’ The Spatial Vision for the RBC plan notes ‘the general extent of the Green Belt will have been protected by making the most efficient use of land.’

The allocation of SL9 is unsound as its release is not consistent with the Local Plan strategy for meeting sustainable development.

To summarise, SL9 is unsound and needs to be deleted from the Plan as:

- SL9 is not consistent with Paragraph 85 of the NPPF (2012) which requires Green Belt release to follow the Local Plan strategy for meeting sustainable development;
- SL9 is not consistent with Paragraph 32 of the NPPF (2012) as safe access to the site cannot be achieved once heritage, third party land and landscape constrains are adequately assessed;
- SL9 is subject to covenants which would prevent the site from being considered as developable for the purpose of the NPPF at the quantum of homes identified in the allocation.

Main Modification 24, 26, 31, 32, 33, 34, 35, 36, 37, 38 – A320 Dependent Sites

Main Modifications MM24, MM26, MM31, MM32, MM33, MM34, MM35, MM36, MM37, MM38 all include the addition of wording to the site allocation to state that the delivery of new homes is ‘subject to delivery of necessary mitigation on the A320.’
The cumulative total of homes dependent on the A320 works being completed is circa 1,800 homes (not including Longcross Garden Village). This represents almost four year’s worth of housing supply for the Local Plan. The reliance on the identified A320 mitigation being delivered is fundamental to the soundness of the plan.

The Council’s timetable for the A320 Improvement Programme identifies completion of the works in March 2024. In light of the available evidence, the mitigation falls short of the test within Paragraph 177 of the NPPF:

1. It is noted that the Statement of Common Ground with Highways England does not identify any agreed timescale for delivery of the Junction 11 works. The M25 Junction 10 to 16 Smart Motorway Scheme is programmed to be completed in 2023. Given the complexity of managing two different contractors using the same road space as well as the disruption caused by undertaking concurrent highway schemes, it is inevitable that the Junction 11 works will need to be undertaken after the Smart Motorway scheme is completed. This is likely to result in the Junction 11 works being completed no sooner than around 2026.

2. As set out in Section 2 of this note, the Council’s mitigation schemes elsewhere on the A320 are, at best, no more than at an embryonic stage. Given the large number of locations where mitigation is required and the complexity of the issues at each location (not least space constraints and land ownerships), it is highly unlikely that detailed design will be completed by August 2020 to enable tender documentation to be prepared.

3. The embryonic mitigation schemes identify the need for third party land at a number of locations. i-Transport’s analysis of the Otter roundabout proposal has been unable to identify an acceptable scheme within the tight constraints of the existing public highway. Acceptable mitigation will not be achievable without securing third party land. RBC’s timetable makes no allowance for the considerable time and difficulty in securing third party land, e.g. the need for a CPO process.

4. Delivery of the mitigation is very much dependent on obtaining public funding. At the time of this submission, the outcome of the HIF and MRN processes remains unknown. Whilst the HIF bid seeks £44million, it is unknown whether that will be sufficient to deliver the necessary mitigation. Even where the Council has a relatively well developed scheme – at Junction 11 – the need for expensive retaining structure and/or the need to purchase third party land is unknown.

In responding to the test of ‘reasonable prospects’ the HiF bid is not confirmed and it would be unjustified to adopt the Plan on the assumption that this was to be granted. The HiF bidding process is extremely competitive and we are unaware of any evidence that would support advancing the Plan on the assumption it is granted. Furthermore, paragraph 14 of the NPPF requires that plans should be developed with ‘the flexibility to respond to rapid change.’ It is clear that the Plan, as drafted, assumes that HiF will be secured but this is unknown and, if withdrawn, would represent a rapid change for the Council.

In this context the Plan must include an element of contingency within it. Whilst it may be unreasonable to suggest that the contingency should extend to the whole stretch of the A320, as a minimum it should include a proactive (HiF independent) solution for Junction 10 of the A320 which is identified as a critical junction for improvement.

It is incumbent on the Plan (if it is to be found sound) to ensure that there are reasonable prospects of the required infrastructure being delivered.

The approach taken to site allocations along the A320 is not justified in that it creates uncertainty in delivery. The plan needs to build in contingency (in the form of non-A320 dependent sites) in order for the overall A320 approach to be found sound.

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1 Ref: Page 12 of the A320 Update Paper  
2 Ref: https://highwaysengland.co.uk/projects/m25-junction-10-to-junction-16-smart-motorway/  
3 Based on the circa 2½ year timetable from enabling works starting to completion of works identified in para 5.12 of the A320 Update Paper.
Main Modification MM22 – Longcross Garden Village

Main Modification MM22 states:

‘Surrey County Council and Runnymede Borough Council agree in principle (our emphasis) that the continued delivery of residential development at Longcross Garden Village, in advance of the full completion of the A320 North of Woking Scheme, is technically feasible. Runnymede Borough Council anticipates that in the order of 600 homes (excluding completions and commitments arising from the existing hybrid planning permission) could be delivered at Longcross Garden Village in advance of the full completion of the A320 North of Woking Scheme in March 2024.’

MM22 brings into questions two principal issues (1) whether the inclusion of 600 homes on highways grounds is justified and (2) whether the inclusion of 600 homes to 2024 reflects a justified assumption for the build out rate of Longcross North and Longcross South.

Highways Position

The extent of agreement between SCC and RBC on the proposed contribution from Longcross Garden Village is noted as being ‘in principle.’ In light of the challenges noted below, this Main Modification falls short of the level of evidence that is required to ensure that the inclusion of 600 units is sound in its contribution to the five-year land supply. The suggested Main Modification is therefore not justified.

As highlighted in the below, the required evidence to justify the proposed housing completions from a highways perspective does not currently exist and is left to the planning application stage. Such a process is unsound and cannot be used to support the proposed inclusion of circa 600 homes from the Longcross Garden Development by 2024.

DELIVERY OF HOUSING AT LGV

3.1 Discussions between RBC and Crest & CGNU have considered whether any additional traffic generated by the development could be accommodated on the local highway network without materially affecting the A320 corridor, under an ‘interim’ scenario or scenarios and where the A320 North of Woking scheme has not yet been completed. RBC and Crest & CGNU acknowledge and agree that these interim scenarios will need to be subject to the conclusions of detailed transport assessments produced in advance or alongside individual planning applications (where required) with appropriate modelling assumptions agreed in advance with SCC as the local highway authority.

The justification for the Main Modification appears to be led by the following response:

“Mindful of the potential impact of this additional housing development on the A320 prior to completion of the A320 improvement works and the aspiration to see those works substantially completed in parallel with letting its proposed employment space, Crest Nicholson has also indicated that, in practice, it would not expect to begin implementing a significant proportion, or potentially all, of the remaining 62,260m² of permitted employment space at the Longcross Business Park until August 2023 (being the latest implementation date permitted under the existing planning permission at Longcross North). This would enable a continuation of housing completions as shown in the revised trajectory at Appendix 2.”

The inference from the above is that the acceptability of 600 units ahead of the completion of the A320 mitigation works is justified on the basis of an ‘indication’ that Crest Nicholson will not implement its employment permission
until 2023/24 and that this will create capacity in the network that is currently taken as committed. Such an approach is not justified. For example, the employment element of the site could be sold to a strategic employment developer with aspirations to implement the consented employment floorspace before 2024 (this adding trips to the network). The statement of common ground does not reflect a justified position on which to assume housing delivery before the A320 mitigation is delivered.

In addition, in transport terms it is not a sound approach to simply ‘swap’ employment trip generation figures with residential trip generation figures as both have different peak impact times.

### Short Term Housing Trajectory Assumptions

The Statement of Common Ground with Crest Nicholson (RBCLP_56) includes the following assumptions (those in bold are represent units that have been permitted).

#### Short Term Housing Trajectory at Longcross Garden Village

<table>
<thead>
<tr>
<th>YEAR</th>
<th>LONGCROSS NORTH</th>
<th>LONGCROSS SOUTH</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020/21</td>
<td>23</td>
<td></td>
</tr>
<tr>
<td>2021/22</td>
<td>120</td>
<td>50</td>
</tr>
<tr>
<td>2022/23</td>
<td>120</td>
<td>150</td>
</tr>
<tr>
<td>2023/24</td>
<td></td>
<td>150</td>
</tr>
</tbody>
</table>

Source: RCLP_56

RCLP_56 notes that the trajectory is based on (1) the submission of an outline planning application for residential-led development on Longcross South by Spring 2020 and a full planning application for a PRS (Private Rental Sector) phase of development on Longcross North in the first half of 2020.

We would question the revised housing trajectory as submitted through the Statement of Common Ground. This assumes circa 590 homes being delivered within a three-year period.

With respect to Longcross South, the Statement of Common Ground suggests that 350 homes will be delivered by 2024. Considering the assumptions below we consider that such a delivery is not sound:

- Assuming an outline planning application is submitted in April 2020 this is likely to take at least 12 – 18 months to achieve a permission.
- Reserved matters and discharge of conditions applications would then need to be submitted, assuming a circa 6-9 months determination process.
- Allowing a minimum 3 month lead in to start on site means that the earliest that the development will start is April 2022.
- Assuming an aggressive development programme with no/limited abnormal construction works, the first units should be completed and ready for occupation 6 months later i.e. October 2022.
- In order for 350 units to be delivered by the end of 2024 it would involve the developer completing 162 units per year (pro-rata) between October 2022 and December 2024.

In light of this we do not believe that the Council can rely upon the 350 units from Longcross South being delivered before 2024, rather 100 units is a more realistic assumption. As this loss forms part of the five-year housing supply an additional strategic allocation is necessary to provide contingency in the housing delivery trajectory.
Summary

Further Main Modifications are required to the RBC Local Plan if it is to be found sound. The required amendments relate to:

1. The deletion of the Virginia Water North allocation and the inclusion of at least one new site which is deliverable in the first five years of the plan.;
2. Contingency added to the Local Plan to ensure that housing completions can continue in the likely event that delays occur in the completion of the A320 project;
3. The assumed trajectory at Longcross Garden Village prior to 2024 is amended and a replacement site identified to make up the anticipated shortfall.

The additional Main Modifications could be addressed by a further and final Main Modifications consultation and need not significantly protract the adoption of the Local Plan. Once these matters are accounted for the Local Plan can be considered as sound.

Most notably in respect of the Virginia Water North allocation, without amendment the Council will leave itself open to potential legal challenge.

We trust that the above comments are helpful in the context of ensuring that the Local Plan is sound. We would be grateful if you could confirm receipt of this letter and that the representations have been duly considered. Should you wish to discuss any matter in more detail, please do not hesitate to contact me.

Yours faithfully

Appended: Vision Transport Note and RPS Heritage Note, Parcel Plan
Dear Sir/Madam

RUNNYMEDE 2030 LOCAL PLAN - SITE ALLOCATIONS

WRITTEN REPRESENTATIONS ON BEHALF OF ASHILL LAND LIMITED

Vision Transport Planning is appointed by Ashill Land Limited to submit representations to Runnymede Borough Council in respect to their emerging Local Plan (Runnymede 2030 Local Plan) and specifically in respect to the allocation of land at Merlewood Care Home for residential development.

Vision Transport Planning has previously prepared a Technical Report, dated 11 November 2016, which set out a review of the Transport Note (dated 24th August 2016) prepared by JMP Consultants Ltd (JMP), in respect to a potential residential development site at Merlewood Care Home, Virginia Water. The 2016 Vision Transport Planning report included a review of the Hollow Lane/Callow Hill junction and reached the following conclusion:

This junction suffers from a considerable shortfall in the available visibility (both towards the north and the south). All development traffic will require access and egress via this junction and as such the development proposals (as presented) will have a clear and detrimental impact on road safety. No mitigation measures are proposed in respect to this issue and it is concluded that the redevelopment of the site for residential purposes would result in a severe impact in terms of access and road safety.

Vision Transport Planning has reviewed the comments made by the County Highway Authority (Surrey County Council) within their Note clarifying document RBCLP 63 (produced in April 2018) which was provided during stage 2 hearings on transport development planning considerations for the proposed site allocations. Within this note, Surrey County Council stated, in respect to access to land at Merlewood, that:

This is on a private road outside of the jurisdiction of the CHA. However having carried out a site visit it was noted that the proposed access is bordered by historic brick walls that limit visibility significantly. These could be removed/resited to improve views, or if this is not possible, there is sufficient space to move the carriageway to allow for a wider verge to improve visibility.

Having reviewed matters Vision Transport Planning stands by, and reiterates, the comments set out within its 2016 Technical Report. Fundamentally, due to the alignment of Callow Hill and the presence of third party land, it is apparent that there is a significant and material shortfall in visibility at this junction, which would not be resolved (to an appropriate standard) by simply removing/resitting the wall or allowing for wider verges. As such a 'road safety' objection relating to the safety implications associated with the increase in vehicular trips via the Old Hollow/Callow Hill junction remains. Further detail in respect to this aspect has been set out below.
Callow Hill is a distributor road that is subject to a 40 mph speed limit. Due to the nature of Callow Hill the design of any new access or alteration to an existing access should be in accordance with the guidance set out within the Design Manual for Roads and Bridges (DMRB). Based on the 40 mph speed limit DMRB standards would require visibility splays that extend 120 metres, to ensure an appropriate level of visibility is provided at the junction of Hollow Lane and Callow Hill.

It is apparent that the existing level of visibility at this junction falls materially and significantly short of this. Visibility in both directions is restricted due to the alignment of Callow Hill and the presence of third party land to the north and south of the junction. An assessment of the available visibility has been undertaken, based on the OS mapping and having regard to the extent of the public highway. A copy of the public highway plans has been attached as Appendix A, whilst a drawing detailing the visibility splays available (within the public highway margin) has been attached as Appendix B.

It can be seen from reviewing the drawing attached as Appendix B that visibility splays of circa 2.4 metres x 33 metres can be achieved to the north, and 2.4 metres x circa 27 metres can be achieved to the south. This is considerably less than the 120 metres that DMRB recommends for streets subject to a 40 mph speed limit. To assist the full extent of the 120 metre splays has been added to the drawing attached as Appendix B, which clearly demonstrates that a substantial area of third party land would be required to facilitate the required visibility splays. Indeed the property to the south (known as Kenwolde) falls partly within the visibility splay envelope. Given the above it is clear that there is a substantial shortfall in visibility at this junction, to such an extent that any additional traffic generating development accessed via Hollow Lane will be likely to result in serious road safety impacts that can be considered ‘severe’.

In summary it is concluded that it has still not been demonstrated that a safe and satisfactory access can be delivered to facilitate the development of the Merlewood site for residential purposes. It is concluded that there remains technical transport and access barriers that should prevent the allocation of the site for residential use and that the redevelopment of the site for residential purposes would fail national and local policy.

We trust the above representations can be duly considered and taken into account. Please do contact me should you have any queries in respect to matters set out above.

Yours sincerely
Appendix A
This drawing has been specifically prepared to meet the requirements of the named client and may contain design and innovative features which differ from conventional design standards.

Work on Behalf of:
ASHILL LAND LIMITED

Project:
MARLEWOOD CARE HOME SITE
VIRGINIA WATER

Drawing Title:
VISIBILITY SPLAYS
HOLLOW LANE/CALLOW HILL JUNCTION

Scale: 1:1000

Date: 07/11/16

Legend:
- EXISTING HIGHWAY BOUNDARY

Plot Date: 07 November 2016 20:21:51
CAD Reference: D:\CAD\PRECISION\LTD BOX FILES\DATA\001114-VISION\TP16058 MARLEWOOD CARE HOME SITE\16058-01.DWG

Ordnance Survey, (c) Crown Copyright 2016. All rights reserved. Licence number 100022432
Built Heritage in the Callow Hill and Hollow Lane Precinct

The site at the corner of Callow Hill and Hollow Lane, Virginia Water, is currently being considered for allocation for residential development.

We consider there would be potential to cause harm to a collection of 19th century structures which exhibit a moderate level of local significance associated to their architectural and historic interest.

Heritage Policy

Under Paragraph 189 of the National Planning Policy Framework (NPPF) proposals for change require a description of “the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”. Paragraph 190 states that “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”

The NPPF also offers guidance to LPAs for decision making in relation to heritage assets at Paragraph 193: “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

The desirability of conserving designated and non-designated heritage assets is similarly made clear in the emerging Runnymede Borough Council Draft Local Plan which is currently under examination:

Policy EE8: Locally Listed and other Non-Designated Heritage Assets The Council will develop and maintain an up to date list of non-designated heritage assets of local architectural or historic interest. This list will include where appropriate the identification of potential opportunities for active preservation. Development will be required to preserve the character and significance of locally listed and other non-designated heritage assets, their setting and any features of architectural or historic interest. The historic landscape of the Borough should be respected, taking into account locally distinctive settlement patterns, hedgerows, woodlands and canals. Proposals for the demolition of a locally listed heritage asset, and/or the loss or removal of important features of character will be assessed in the light of their significance and the degree of harm or loss. Proposals which would secure the repair and use of a locally listed or other non-designated heritage asset in a manner consistent with its conservation and which would retain features of architectural or historic value will be supported. Non-designated heritage assets of archaeological interest which are considered to have significance equivalent to that of designated assets will be subject to policy EE7.
Historical Development

Historical built form is evident on the site from the OS map of 1842-1852. It shows a collection of large houses including Kenwolde, Merlewood and Trottsworth.

The era of establishment of these buildings is representative of the development pattern in the parishes of Egham and Virginia Water, which holds historic special interest at a local level. Furthermore the quality of the buildings and their relative intactness and legibility as a group demonstrates architectural interest.

These substantial houses, the associated lodges and their ancillary structures are clearly demarcated by a strong boundary wall on the road edge which serves to bind the group within a distinct precinct on the corner of Callow Hill and Hollow Lane. The gate piers and entrances are handsomely composed to signal the high status of the dwellings. These decorative thresholds and partial views of the historical buildings beyond provide special character to the local area.

The proposed allocation for large scale residential development would potentially affect the integrity and intactness of what remains a legible group of concomitant buildings and a distinguishable settlement pattern.

The level of modification required to provide access to the site, if it is allocated for residential development, would demolish or modify elements of the group that would erode its fabric and its setting, reducing legibility and integrity and therefore affect its local significance.

Local List

Runnymede Borough Council provide clear criteria for assessing local significance. Merlewood House and its Lodge were recently added to the local list of non-designated heritage assets. However it does not appear that Kenwolde House was nominated and therefore it has not been formally assessed by the LPA.

The recognition of Merlewood House on the Local List does not articulate the contribution of setting to its significance nor the potential for recognising a wider group value in relation to the proximate, high quality buildings of a similar age, namely Kenwolde House.

It is considered that multiple elements on the allocation site could meet the Local List criteria and therefore also deserve to be enhanced and protected. Following appropriately detailed assessment, Kenwolde House could potentially be included on the local list along with the built elements that comprise its setting and contribute to its significance.
Our ref: Callow Hill / Hollow Lane Heritage Advice Note

Inclusion on the Local List must satisfy the following four criteria:

- They must be a building or built structure.
- They must have heritage interest that can be conserved and enjoyed. There are two main types of heritage interest – Historic interest and Architectural interest.
- The heritage interest they possess must be of value to the local community i.e. beyond personal or family connections, or the interest of individual property owners.
- They must have a level of interest and value that is greater than that of the general surrounding area.

Kenwolde House and Group Value

Kenwolde House (including Kenwolde Manor, Kenwolde Court, Kenwolde Place), the Lodge and the ancillary built form could potentially satisfy all four local list criteria:

1. There are a number of structures that contribution to the setting and therefore the significance of the principal buildings. They act in concert to provide group value and define a local historical precinct at the corner of Callow Hill and Hollow Lane.
2. Kenwolde House is of architectural interest and historic interest due to it being a substantial house and its early establishment within the region of Virginia Water.
3. Kenwolde House makes an important positive contribution to the appearance of the area by being a substantial building with associated structures that is partially appreciable from the public realm.
4. The collection of built form demonstrates a level of interest related to the 19th century development of Virginia Water which coincides with a pattern of similar development in other regions.

It is important to note that heritage assets do not need to be included on the local list to be treated at non-designated heritage assets during the determination of planning applications.

Future Development

The potential heritage status of the existing buildings on the allocation site could be negatively affected through the competing demands of residential development on the wider site.

Preliminary designs for access to the development site show that the wall and gate piers on Callow Hill would need to be removed in order to provide safe visual access (Vision TP drawing 16058-01, Nov 2016). This would greatly reduce the contribution that Kenwolde House makes to the character and appearance of the local area and potentially cause harm to its significance. The character and appearance of the building has been recognised and protected in previous planning decisions (RU.12/0890). The protections for these recognisable attributes could be extended by inclusion on the Local List and careful consideration of the future of these assets.

It is important that due consideration is made in regard to the non-designated heritage assets and that harm to significance is avoided.

Yours sincerely,
for RPS Group Limited
Kenwolde
6.5 acres - 26 dwellings
(2.66 ha)         9.7 dph

Merlewood
19.1 acres - 86 dwellings
(7.76 ha)        11 dph

Gorse Hill Manor & House
7.6 acres - 6 dwellings (net)
(3.08 ha)        1.94 dph
Local Plan Proposed Modifications Consultation
Comments Form

The best way to comment on the Proposed Main Modifications is using the below comment form.

Once completed, please send us your completed comments form by:

- E-mail to planningpolicy@runnymede.gov.uk or
- Post to Planning Policy and Economic Development team, Runnymede Borough Council, Civic Centre, Station Road, Addlestone, KT15 2AH

We must receive all responses by 11:59pm on Friday 21st February 2020. Any comments received after this cannot be accepted.

Introduction

Runnymede Borough Council is consulting on the following:

- Schedule of Proposed Main Modifications ONLY

The following documents are also published for information only:

- Schedule of Proposed Additional Modifications
- Proposed Main Modifications Sustainability Appraisal
- Proposed Main Modifications Habitat Regulations Assessment
- Proposed Main Modifications Equality Impact Assessment

How to comment

The Council is inviting comments on the Proposed Main Modifications from Friday 10th January 2020 until 11:59pm on Friday 21st February 2020. You can view the consultation documents at:

- At Runnymede Civic Centre
- Local library locations in and around Runnymede

Comments can be made using this form and returned by:

E-mail planningpolicy@runnymede.gov.uk

Post or Hand Planning Policy and Economic Development team, Runnymede Borough Council, Civic Centre, Station Road, Addlestone, KT15 2AH
If you are completing this form electronically, please save this questionnaire to your computer using the Save As button on your toolbar, fill it in, and then e-mail it to: planningpolicy@runnymede.gov.uk.

We must receive all responses by 11:59pm on Friday 21st February 2020. Any comments received after this cannot be accepted.

Please note that any comments made verbally or anonymously cannot be accepted.

If you need help making comments or have any questions, please e-mail planningpolicy@runnymede.gov.uk or call Planning on 01932 425131.

How comments will be used

All the comments on the Schedule of Proposed Main Modifications will be sent to the Inspector carrying out the Examination so she can conclude her examination and make a final recommendation.

Representations should only relate to the changes contained in the Schedule of Proposed Main Modifications. Anyone that has made a representation to the Draft Local Plan consultations in 2018 does not need to make their representation again unless a new comment on the proposed Main Modifications is being made.

Copies of comments received during the course of the consultation will be made available for the public to view on the Council’s website.

IMPORTANT

Copies of comments received during consultation will be made available for the public to view on the Council’s website. Comments therefore cannot be treated as confidential. Personal details will be redacted prior to publishing. Data will be processed and held in accordance with the Data Protection Act 2018. Please see the Council’s Privacy Statement for more information.
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<th>Agent Details (if applicable)</th>
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<td><strong>Title:</strong> ASSOCIATE DIRECTOR (CERE)</td>
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Part B – Your Comments on the Main Modifications

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

Schedule of Proposed Main Modifications

Modification Reference Number: MM 29

Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound*?

Yes ☐ No ☒

Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:

Positively Prepared ☐ Justified ☒ Effective ☐ Consistent with National Policy ☒

Your Comment:

SEE COVER LETTER.

*The considerations in relation to being ‘sound’ are explained in Appendix 1 of this Form.

Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

Please complete a continuation sheet for separate comments if you wish to submit a comment on more than one proposed Main Modification.

If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.
Continuation Sheet

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

Schedule of Proposed Main Modifications

Modification Reference Number: MM mm 22

Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound*

Yes [ ] No [ ]

Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:

Positively Prepared [ ] Justified [x] Effective [ ] Consistent with National Policy [ ]

Your Comment:

SEE COVER LETTER.

Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.
Continuation Sheet

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

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Q1. Do you consider the Proposed Main Modification to the Local Plan to be **sound**?  

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Q2. If you consider the Proposed Main Modification is 'unsound' please identify the test of soundness to which your representation relates:

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</table>

Your Comment:  

`see case letter`  

Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.