

**INDEPENDENT EXAMINATION OF THE VIRGINIA WATER
NEIGHBOURHOOD DEVELOPMENT PLAN 2024-2035**

EXAMINER: DEREK STEBBING BA (Hons) DipEP MRTPI

Examination Ref: 01/DAS/VWNP

John Pyle
Chair - Virginia Water Neighbourhood Forum

Mike Corbett MRTPI
Runnymede Borough Council

20 October 2025

Dear Mr Pyle and Mr Corbett

Following the submission of the Virginia Water Neighbourhood Plan (the Plan) for examination, I would like to clarify several initial procedural matters. I also have a number of questions for the Virginia Water Neighbourhood Forum (the Qualifying Body) and Runnymede Borough Council (the Borough Council), to which I would like to receive a written response(s) by **Friday 21 November 2025**, if possible.

1. Examination Documentation

I can confirm that I am satisfied that I have received the draft Plan and accompanying documentation, including the Basic Conditions Statement; the Consultation Statement; the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report; and the Regulation 16 representations, to enable me to undertake the examination.

2. Site Visit

I will aim to carry out a site visit to the neighbourhood plan area during the week beginning 10 November 2025. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.

3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

From my initial assessment of the Plan and supporting documents, I have identified a number of matters where I require some additional information from the Borough Council and the Neighbourhood Forum.

I have eight questions seeking further clarification, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response(s) by **Friday 21 November 2025**.

5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 6-8 weeks of submission of the draft Plan. However, as I have raised eight questions, I must provide you with sufficient opportunity to reply. Consequentially, the examination timetable may be extended. Please be assured that I will aim to mitigate any delay as far as is practicable. The IPe office team will seek to keep you updated on the anticipated delivery date of the draft report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on the Neighbourhood Forum and Borough Council's websites.

Thank you in advance for your assistance.

Yours sincerely

Derek Stebbing

Examiner

ANNEX

From my initial reading of the Virginia Water Neighbourhood Plan 2024-2035 (Submission Version June 2025), the supporting evidence and the representations that have been made to the Plan, I have the following eight questions for the Qualifying Body and the Borough Council. I have requested the submission of responses **by Friday 21 November 2025**, although an earlier response would be much appreciated. All of the points set out below flow from the requirement to satisfy the Basic Conditions.

Question 1: Re. Policy VW1 (High Quality Design) and Figure 2 (VWNP Design Code Policy Map) (Pages 19 and 24)

It is my initial assessment that the 'Virginia Water Design Code' (May 2025) needs to appropriately referenced in the draft Plan to a much greater extent than is presently the case. It is clearly a requirement for the successful implementation of Policy VW1 and the interpretation of the coding for the six Character Areas defined on Figure 2. Indeed, at paragraph 6.2, the Design Code is described as a "*separate background evidence document*". Its status is much more significant than this, notwithstanding the Design Code itself will not form part of the statutory development plan for the area.

My current view is that the full document, which is only 20 pages in length, should be an Appendix to the Plan with appropriate cross-references to it from Policy VW1 and the relevant parts of the supporting text contained in Section 6, for example at paragraphs 6.1 and 6.35.

Additionally, I consider that the policy text within Section 6 needs to provide rather more detail on the purpose and content of the Design Code for the promotion of high-quality development and visually appealing urban design within the Plan area, than is presently set out very briefly within paragraphs 6.1, 6.2 and 6.35.

Can the **Qualifying Body** please provide me with a Note setting out proposed amendments to Policy VW1 and other parts of the draft Plan that would address the points that I have raised above, which I can consider as potential modifications to the draft Plan.

I also suggest that the **Qualifying Body** should take into consideration the Borough Council's representations regarding the Design Code, contained at pages 2 and 3 of Appendix 1 to the Council's representations dated 14 October 2025.

Question 2: Re. Policy VW2 – Local Gaps (Page 25)

As drafted, this Policy raises issues of its consistency with current national planning policy¹ and its general conformity with the strategic policies contained in the adopted Runnymede 2030 Local Plan. This raises the further, and more important, consideration of whether the draft Plan satisfies the Basic Conditions. There have been some significant representations at the Regulation 16 consultation stage objecting to this Policy, including some extensive comments made by the Borough Council, who consider, inter alia, that the Policy duplicates national and Local Plan strategic policy requirements.

I note, and have studied, the accompanying Local Gap Study, prepared by Briarwood Landscape Architecture in August 2023, which serves as the principal evidence base document for this Policy.

¹ As contained principally in the National Planning Policy Framework (NPPF) and its accompanying Planning Practice Guidance (PPG).

I also note that the proposed Local Gap extends across two of the proposed Design Code Character Areas, which in my assessment adds a further layer of policy duplication to those areas.

I further note that the adopted Runnymede 2030 Local Plan contains no allocations for proposed development within the area covered by the proposed Local Gap. Similarly, neither the adopted Surrey Minerals Plan Core Strategy (2011) nor the Surrey Waste Local Plan (2020) contain any proposed allocations for minerals or waste developments. However, I understand that there have been two planning applications for large scale mineral extraction within the area in recent years.

I confirm that I shall visit the areas covered by the proposed Local Gap during the course of my site visit. I also confirm that I shall give full consideration to the representations that have been made concerning the Policy.

From my initial assessment, the key issue that I shall need to address is whether the Policy provides appropriate and justifiable protection to the landscapes that lie within the proposed Local Gap which are not otherwise suitably addressed by their current designations, the draft Policies in this Plan or those within the adopted Local Plan, and in particular that such protection justifies the final part of the Policy text.

I invite the **Qualifying Body** to consider the representations that have been made to this Policy, and to provide me with a Note on any points arising from those representations and my own initial assessment above (i.e. those that it considers pertinent to my full detailed assessment in due course).

Question 3: Re. Figure 4 VWNP Active Travel Policy Map (Page 36)

I would be grateful if the **Qualifying Body** could provide me with a Note addressing the points raised by the Borough Council concerning this Map (at page 7 of Appendix 1 to the Council's representations dated 14 October 2025).

I also seek confirmation that "*Figure 5*" referenced in the text of Policy VW5 should read "*Figure 4*".

Question 4: Re. Policy VW6 – Highways Environment (Page 37)

As drafted, this Policy does not constitute a land-use planning policy but, instead, is a statement that certain development proposals which secure funding including developer contributions to deliver highways and public realm improvements will be supported.

It therefore conveys the implicit assumption that proposals which do not deliver such funded improvements will not be supported. Furthermore, it is possible that some proposals which do include funded highways and public realm improvements may not be acceptable for other valid planning reasons, such as design, density and layout.

It is also the case that many development proposals, such as changes of use or minor extensions, will not be required to provide any highways and public realm improvements.

The Policy therefore requires substantive revision in order to provide effective policy guidance to users of the Plan on the highways, traffic and public realm considerations that should be taken into account in the design of development proposals in the Plan area.

I therefore invite the **Qualifying Body** to consider the points raised above and provide me with the text of a revised policy that I may consider as a potential modification to the draft Plan.

Question 5: Re Policy VW7 – Green and Blue Infrastructure Network (Page 39)

Paragraph 12.3 states that *“all new planning proposals, including a change of use where the impact of the new use will exceed that of the existing use, will need to prepare a green and blue infrastructure plan to accompany a planning application”*. This statement exceeds the requirements of the Policy itself, and is therefore potentially confusing for users of the Plan. In my assessment, the Policy needs to specify in more detail which categories and scale of development the Policy is intended to apply to, (as it will not apply to many minor development proposals, including householder applications), and that paragraph 12.3 should be suitably amended or deleted.

Can the **Qualifying Body** please provide me with a Note setting out the necessary amendments to the Policy text and to paragraph 12.3 of the supporting policy text, that I may consider as a modification to the draft Plan.

Question 6: Re. Policy VW8 – Sustainable Building Design (Page 42)

As drafted, I consider that this Policy does need some redrafting in order to provide a clearer understanding of its requirements for prospective users of the Plan, many of whom will be concerned with preparing planning applications.

I consider that the Policy needs to contain an introductory statement that it is setting out a series of requirements to promote sustainable building design in the Plan area. This should then be followed, either by a series of clauses under appropriate sub-headings such as ‘Energy performance’ and ‘Heritage assets’ or by a series of bullet point criteria.

I also note that Surrey County Council (as Lead Local Flood Authority) has made a representation stating that its previous representation (at the Regulation 14 consultation stage) regarding the requirements for the Plan to include a requirement for Sustainable Drainage Systems (SuDS) has not been addressed by the Qualifying Body. I also consider that this does need to be included in the draft Plan, and my initial assessment is that this could be included as part of Policy VW8, with appropriate supporting text.

I therefore invite the **Qualifying Body** to please provide me with a Note setting out the necessary amendments to the Policy text and its supporting text, that I may consider as a modification to the draft Plan.

Question 7: Re. Policy VW9 – Community Facilities (Page 46)

A representation has been submitted at the Regulation 16 consultation stage by the owners of Site No. 21 (Longfield Lake) stating that it is not a community facility, but is instead a commercial enterprise with access limited to customers to paid leisure activities.

It is possible that there are other commercial enterprises listed within Policy VW9, but it is also possible that some other commercial facilities, such as private gyms and private health facilities, are not listed.

I wish to ensure that the Policy covers an accurate and consistent definition of those facilities and services within the Plan area that fall within the common understanding of ‘community facilities’, to which the requirements of the policy’s criteria would correctly apply.

Can the **Qualifying Body** please identify for me which of the facilities listed in Policy VW9 function as commercial businesses, and which are provided for community use by public bodies, community bodies, churches, charities etc. (I acknowledge that public houses are usually privately-owned).

Question 8: Re. Runnymede 2030 Local Plan Review

Can the **Borough Council** please confirm that the decision taken by its Planning Committee on 24 September 2025 that the commencement of the Runnymede 2030 Local Plan Review will await the introduction of the new plan-making system, and that the timetable set out for this Review at Annex 1 (page 12) to the Borough Council's Local Development Scheme (2024-2028) (October 2024) will be amended appropriately?

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