

14 October 2025
Our Ref: 24.5072

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



Dear Sir/Madam,

Virginia Water Neighbourhood Plan – Consultation Response

I am writing on behalf of our client, [REDACTED], in respect of the emerging Virginia Water Neighbourhood Plan which is currently the subject of consultation.

Our client has an interest in a parcel of land at Stroude Farm, on the edge of Virginia Water which is being promoted for residential development. As part of this work, pre-application discussions have been held with planning officers at Runnymede who recognise that the site would meet with the Grey Belt definition as set out in the NPPF. As well as new residential development the proposals include new areas of public open space on the northern part of the site that would represent a new green edge to Virginia Water.

Comments

The legal and procedural tests that a Neighbourhood Plan (NP) must comply with are set out within the Localism Act 2011, the Neighbourhood Planning (General) Regulations 2012, the National Planning Policy Framework (2024) and the National Planning Policy Guidance (and subsequent updates). It is against these tests that the draft NP must be considered.

We do not seek to repeat this guidance but of particular importance is the relevant basic conditions applicable to the NP which are:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- (d) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- (e) The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (f) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.



(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

We acknowledge that a significant amount of work has been undertaken to inform the emerging Neighbourhood Plan and support its overall aims and objectives for safe and improved connectivity, enhanced green spaces and infrastructure, and support for family-oriented housing.

Policy VW1 (High Quality Design) seeks to ensure that development proposals accord with the provisions of the Virginia Water Design Code, a document which has been developed alongside the Virginia Water Neighbourhood Plan. It is important that when applying the criteria of the Design Code it is done in a flexible way to ensure good design without becoming unduly prohibitive. This is especially important given that major new development is likely to be necessary in the area in order to meet the development needs of the wider Borough.

For example, as currently written, the Design Code states that the Stroude Valley “*Character Area requires a minimum of change in its grain and built forms to retain the rural character*”. The justification for this is seemingly on the basis that given the Green Belt status of the area it is necessary that new development must preserve the essential openness of the Green Belt. In light of changes to national policy this is now not necessarily the case (if it can be demonstrated that a site is Grey Belt). In light of the basic conditions (criterion a), we consider that it is necessary for the Design Code (and Policy VW1) to acknowledge and reflect this which underlines our view that it is important that the design objectives are applied having proper regard to other relevant policies and objectives.

A Local Gap Study has been undertaken to inform the Neighbourhood Plan which identifies a significant part of the northern part of the Plan area as a Local Gap, with the intended aim of preventing intrusive development that could erode the separation between Virginia Water and Egham. This designation is supported by Policy VW2 (Local Gap) which is essentially intended to form an extra layer of protection, over and above that set out in national and local policy.

We consider that Policy VW2 is confusing in the above regard. For example, it seeks to impose a policy to protect against visual coalescence, when this is already part of a Green Belt purpose. However, whereas Green Belt policy, as set out in Chapter 13 of the NPPF, “Protecting Green Belt land,” establishes a detailed approach to preventing urban sprawl whilst keeping land permanently open, it is not clear exactly how Policy VW2 would prevent the visual coalescence of the settlements especially immediately north of Virginia Water given that existing development already extends along Stroude Road northwards.

Whilst it is accepted that parts of the Local Gap include valued landscapes as informed by the Local Gap Assessment, the varied nature of the area means that there are parts that are heavily influenced by urban features (e.g. the area around Stroude Farm is bordered by a busy railway/road and existing development which diminishes its landscape contribution). The Neighbourhood Plan does not seek to allocate housing sites (which will be done through the subsequent Borough Local Plan) and so on this basis it is vital that Policy VW2 (Local Gap) does not frustrate development that in all other respects is acceptable.

In light of the lack of clarity around how Policy VW2 would be applied and the potential need for important new development to be located in this part of the Borough means that we consider it is necessary for the Policy to be more flexibly worded to allow new development to come forward where it can be demonstrated that there is no adverse impact on visual coalescence when assessed against a set of clear parameters.

The policy also indicates that removal of vegetation which contributes to the landscape within the Gap will be resisted, however it is not clear how such vegetation contributes to preventing the coalescence of settlements (or indeed where it is located).

We welcome the support cited within the plan for improvements to sustainable transport methods and active travel opportunities as outlined within Policy VW5 (Active Travel), and the acknowledgment within Policy VW6 (Highways Environment) that such improvements to footpaths, cycleways and the highway environment are often facilitated through developer contributions.

I trust that our comments will be taken into account and should you have any further queries then please do not hesitate to contact me.

Yours faithfully

[Redacted signature block]

[Redacted text block]

Tel: [Redacted]

Email: [Redacted]