

Planning Policy Team
By Email planningpolicy@runnymede.gov.uk

13 October 2025

Dear Planning Policy Team,

Virginia Water Neighbourhood Plan

These representations have been prepared by CBRE Ltd on behalf of [REDACTED] in response to the Regulation 16 Consultation of the Virginia Water Neighbourhood Plan (VWNP), dated June 2025. The VWNP is not considered to meet the 'basic conditions' set out in [paragraph 8\(2\) of Schedule 4B of the Town and Country Planning Act 1990](#).

Legislation, National Planning Practice Guidance and Neighbourhood Plans

As per [Paragraph: 001 Reference ID: 41-001-20190509](#) neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. Communities are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.

However, only a draft Neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions include that the making of the 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. In this instance the VWNP would need to be in general conformity with the Runnymede Local Plan (adopted 16th July 2020) and the National Planning Policy Framework.

[Paragraph: 074 Reference ID: 41-074-20140306](#) describes what general conformity with the strategic policies contained in the development plan is below:

What is meant by 'general conformity'?

When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:

- *whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with*
- *the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy*
- *whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy*
- *the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach*

Virginia Water Neighbourhood Plan

Policy VW2 (Local Gap) seeks to retain the openness and rural character by preventing new development from impacting the visual separation between Virginia Water and Englefield Green and between Virginia Water and Egham. Policy VW2 also seeks to resist the loss of woodland or existing vegetation where new development may necessitate its removal, to avoid the potential to bring about visual coalescence between settlements.

Policy VW2 Local Gap

The Neighbourhood Plan designates a Local Gap as shown on the Policy Map (Figure 3) for the spatial purpose of preventing the visual coalescence of Virginia Water with the settlements of Englefield Green and Egham.

Any proposals for new development that lie within the defined Local Gap must be located and designed in such a way as to prevent the visual coalescence of the settlements. The removal of vegetation which contributes to the landscape within the Gap to facilitate new development will be resisted.

This requirement applies whether the proposals are deemed as 'appropriate development' in the Green Belt or they are judged to have the very special circumstances required to justify inappropriate development in the Green Belt.

National Planning Policy Framework

The NPPF requires local planning authorities to ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness through paragraph 153. Paragraph 154 states that development in the Green Belt is inappropriate unless a certain exception applies, such as an engineering operation, provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land within the Green Belt and seeks to protect the Green Belt from inappropriate development. Paragraphs 153 and 154 are shown below:

153. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

154. Development in the Green Belt is inappropriate unless one of the following exceptions applies:

a) ...

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

i.

ii. engineering operations;

iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;

iv.

Runnymede Local Plan

Local Plan Policy EE18 (Engineering Operations in the Green Belt) aims 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.

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. 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.

General Conformity with Development Plan

The VWNP includes a figure (Figure 3: VWNP Local Gap Policy Map) to show the extent of 'Local Gaps' within the VWNP area, as shown in the figure below:

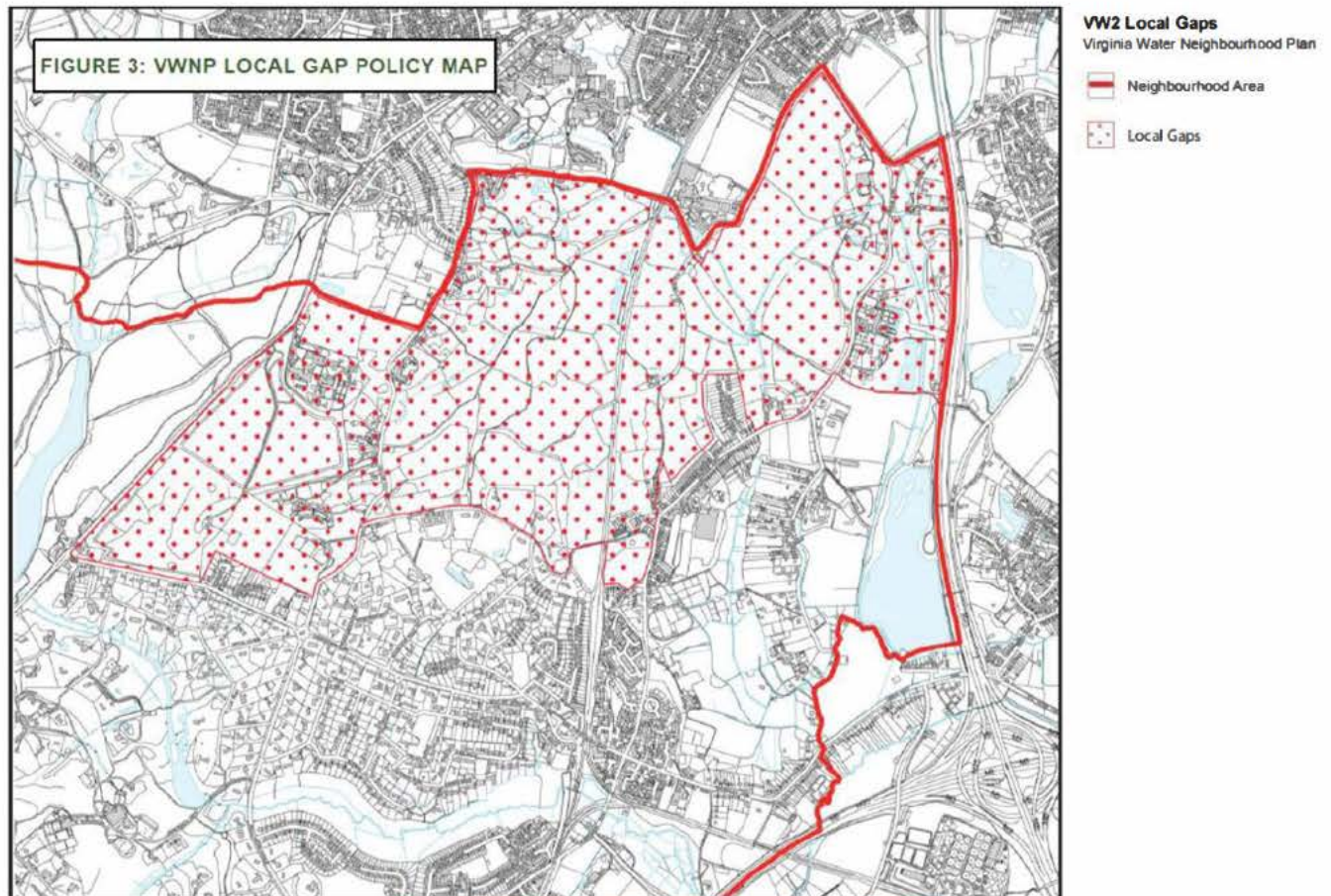


Figure 1: VWNP Local Gap Policy Map (source: VWNP)

The part of the VWNP area that falls within the 'Local Gap' also falls within the Green Belt, shown in the figure below, which is taken from the Runnymede Local Plan Policies Map, with only the 'Green Belt' and the 'Virginia Water North Housing Allocation' designations shown:



Figure 2: Virginia Water Green Belt & SL9 Housing Allocation

It is considered that the VWNP does not meet the basic conditions required by national legislation and guidance. The VWNP is not considered to meet the 'basic conditions' set out within paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, as Policy VW2 (Local Gaps) it is not in general conformity with paragraphs 153 and 154 of the NPPF and Local Plan Policy EE18 (Engineering Operations in the Green Belt). Policy VW2 is not in general conformity with the NPPF and Runnymede Local Plan, as it is an absolute restriction on any development, not allowing for local circumstances and impacts to be taken into account and it goes so far as to not allowing for any 'appropriate development' such as an 'engineering operation' within this part of the Green Belt. This VWNP policy is therefore contrary to national Planning Practice Guidance [Paragraph: 074 Reference ID: 41-074-20140306](#), as it is considered that the draft neighbourhood plan policy conflicts with the strategic policies within the NPPF and Local Plan.

The VWNP does include a supporting Basic Conditions Statement (dated July 2025), however the NPPF Conformity Table (page 5) does not include paragraph 154 of the NPPF, while the Conformity with RBC Local Plan Table (page 8) does not include a direct assessment of the local Plan Green Belt policies either, when assessing Policy VW2.

In order for Policy VW2 to meet the basic conditions, and to be in general conformity with the NPPF and Local Plan, the wording of Policy VW2 should be amended as follows (with new text marked in **bold** and deletions marked in ~~strikethrough~~):

Policy VW2 Local Gap

The Neighbourhood Plan designates a Local Gap as shown on the Policy Map (Figure 3) for the spatial purpose of preventing the visual coalescence of Virginia Water with the settlements of Englefield Green and Egham.

*Any proposals for new development that lie within the defined Local Gap must be located and designed in such a way as to prevent the visual coalescence of the settlements. The removal of vegetation which contributes to the landscape within the Gap to facilitate new development ~~will be resisted~~ **should be minimised***

*This requirement **would not apply when** ~~applies whether the proposals are deemed as 'appropriate development' in the Green Belt or they are judged to have the very special circumstances required to justify inappropriate development in the Green Belt.~~*

Summary

These representations have been prepared by CBRE Ltd on behalf of [REDACTED] in response to the Regulation 16 Consultation of the Virginia Water Neighbourhood Plan (VWNP), dated June 2025. While Turn2us support the guiding principles of the VWNP and support the community right to produce a Neighbourhood Plan, the VWNP does not currently meet the basic conditions required by national legislation. However, with the appropriate amendments described above, it is considered that the VWNP would be in general conformity with the development plan, and would ensure that the VWNP does not inadvertently preclude development that is supported by the NPPF and Local Plan. It is therefore recommended that the competent authority bring about this amendment prior to any referendum taking place.

CBRE Planning