

Examiner of the Virginia Water Neighbourhood Plan Examination

14 October 2025

Dear Examiner,

Virginia Water Neighbourhood Plan Regulation 16 Consultation Response

The following comments constitute Runnymede Borough Council's response (as the Local Planning Authority) to the Regulation 16 consultation on the Virginia Water Neighbourhood Plan (Submission Draft, June 2025) ('the draft VWNP').

This response does not include any comments from the Council in its capacity as a landowner. Runnymede Borough Council (RBC) is generally supportive of the principles put forward in the Plan and appreciates the work invested by those involved in its preparation.

Once it is 'made', the VWNP will form part of the Development Plan for the Borough. Therefore, it is important that officers provide comprehensive feedback on the draft VWNP to ensure its policies are clear and unambiguous, and very importantly for both the Forum and the Local Planning Authority (LPA) – that they are drafted with sufficient clarity that a decision-maker can apply them consistently and with confidence when determining planning applications (as described at para 041 of the National Planning Policy Guidance (PPG)).

The LPA does not have a legal obligation to consider or assess the content of neighbourhood plans in relation to the 'basic conditions' (as described in the Town and Country Planning Act 1990 (as amended)) until after the Examination. However, the PPG states that a LPA should provide constructive comments on an emerging plan. The LPA submitted comments on the draft VWNP as part of the Regulation 14 consultation, with reference to meeting the basic conditions. Some of the points raised have been addressed by the Forum in the submission version, but there are some outstanding issues, as set out in Appendix 1 attached to this letter, where the LPA considers the draft VWNP does not meet the basic conditions.

The Council shares the Forum's goal of achieving a NP which meets the basic conditions. Officers of the Council have carefully considered each relevant part of the draft VWNP, and their comments have been collated in **Appendix 1**. These are broken down into a number of different areas including the draft Plan itself, the current set of Policy maps, the Evidence base documents and the Design Code. At the end of Appendix 1 there is also a list of the strategic Development Plan documents for your information.

Next Steps

Officers appreciate the huge amount of work and commitment involved in getting the draft VWNP prepared. It is our hope that the improvements suggested in Appendix 1 will help achieve this.

Please do not hesitate to contact me to discuss this response further, and I look forward to providing ongoing assistance to the Forum where required.

Yours sincerely,



[REDACTED]
E: [REDACTED] | T: [REDACTED]

APPENDIX 1

Draft Virginia Water Neighbourhood Plan (June 2025)

Submission Neighbourhood Plan Regulation 16 Consultation (Neighbourhood Planning (General) Regulations 2012)

Officer-led Comments from Runnymede Borough Council (RBC)

Where comments relate to the 'basic conditions', these are defined as:

- A) Having regard to national policy and guidance
- D) Contributing to the achievement of sustainable development
- E) General conformity with strategic policies contained in the development plan (see Appendix 3)
- F) Not breaching retained EU obligations; and
- G) Meeting prescribed conditions e.g. whether or not it has a significant effect on habitat sites.

Note that B) & C) are not referred to, as they only apply to Neighbourhood Development Orders.

Key: **Bold underlined** text for additions; ~~**bold strikethrough**~~ for deletion for specific suggested changes to wording.

The Virginia Water Neighbourhood Plan

The comments below relate to the main Neighbourhood Plan document itself. The sections that follow on after this one relate to the associated maps and evidence base.

Section	Reference/ page	Suggestion / basic condition	Comment
N/A	N/A	Suggestion	Adding in a Policy index at the start of the Plan, just after the contents page as this will make it easier for officers to use when determining planning applications.
N/A	N/A	Suggestion	The Forum had originally intended for the Neighbourhood Plan period to go up to 2030, but it has taken longer than anticipated to prepare the Plan, and the Plan period has now been extended to 2035. The Council intends to start work on a new Local Plan once the new plan-making system is brought into force at a national level, at which point the Local Planning Authority will establish a housing requirement figure for the Borough (or emerging unitary authority area). It has therefore not been possible to provide a housing

Section	Reference/ page	Suggestion / basic condition	Comment
			requirement figure for the Virginia Water Neighbourhood Area which reflects the overall strategy for the pattern and scale of development up to 2035 (and an indicative figure has not been requested by the Forum, who do not intend for the Neighbourhood Plan to address housing needs). The Council will be updating its evidence base to inform the policies of the new Local Plan, including the Strategic Housing Land Availability Assessment and the Green Belt Review, to identify a sufficient supply and mix of sites. The Examiner should be aware that strategic housing policies will be prepared covering the latter part of the proposed Neighbourhood Plan period, based on this up-to-date evidence. If adopted, the Forum may wish to consider an early review of the Neighbourhood Plan so that a revised Plan can shape, direct and help to deliver a future housing requirement figure sustainably.
1 Introduction	Paragraph 1.6 on p.6	Suggestion	The text should indicate that Ottershaw has an emerging Neighbourhood Plan rather than inferring that it has an adopted Plan. Suggest the text is modified to: "There are also other neighbourhood plans <u>adopted or being prepared</u> in the vicinity, notably at....".
1 Introduction	Paragraph 1.8 on p.6	Suggestion	The text needs to be amended to refer to the past consultation, and that comments made have already been reviewed to inform this latest iteration.
Vision	p.17	Basic conditions – A and D	The vision refers to supporting 'family-oriented housing' in the third paragraph, but RBC would question whether there is sufficient evidence to suggest that this is the form of housing most in need in the area.
6 Virginia Water Design Code	Page 19	Basic condition A – conformity with NPPF which states that policies should be clearly written and unambiguous and avoid unnecessary duplication of policies that apply in the area.	Policy VW1 states that development proposals must accord with the Virginia Water Design Code. Paragraph 6.2 suggests the Design Code is a background evidence base document, supporting the Neighbourhood Plan. Paragraph 1.2 of the Design Code document itself states that the code serves as a more detailed supplement to the Runnymede Design Supplementary Planning Document (SPD). RBC would welcome clarity on the status of this document – is it intended as an SPD or is it an extension of the Neighbourhood Plan – so that DM officers can determine the amount of weight to give to its provisions in decision-making. There is also a lack of clarity on which codes are relevant for certain types and scale of development. As it stands, both applicants and Development Management officers will find it difficult to determine which codes would apply to different types of planning application / different types of development (e.g. to householder / minor / major / residential / non-residential development proposals).

Section	Reference/ page	Suggestion / basic condition	Comment
			<p>Several statements at the beginning of each code section state that: 'The location of the Character Area in the designated Green Belt means that new development must preserve the essential openness of the Green Belt'. It is suggested these statements are removed, as they duplicate local and national planning policy and, without more context, may lead to confusion (e.g. in instances where proposals may be on Grey Belt land, or is not considered to be 'inappropriate development' in the Green Belt).</p> <p>Finally, RBC is concerned that several codes stray from design matters to other land-use matters, and do not provide enough certainty to applicants or DM officers about how a new development is designed. In many cases (described in more detail below), the codes do not give an applicant or DM officer enough detail to be implemented effectively – the codes should provide more certainty about how a development is designed, but in several cases, the codes do not achieve this, as the language is ambiguous.</p> <p>Please note there is a section below that specifically looks at the Design Code in detail.</p>
6 Virginia Water Design Code	Paragraph 6.6 on p.20	Suggestion	The first sentence refers to a housing mix in the Wentworth Estate, but the second sentence refers to properties above retail shops and close to the railway station, which do not lie within the Estate Character Area. Suggest this paragraph is amended to clarify whether most of the area's one- and two-bedroom properties fall within the village centre.
6 Virginia Water Design Code	Paragraph 6.17 on p.21	Suggestion	The last sentence of this paragraph states: 'Plot width maximisation aligns with NPPF standards, differentiating it from the more open landscape of the main Wentworth Estate.' It is unclear which part of the NPPF this is referring to and thus greater clarity in relation to this would be helpful.
6 Virginia Water Design Code	Paragraph 6.31 on p.23	Suggestion	RBC suggests it would be worth merging this single line paragraph with paragraph 6.30 above as these appear to both be discussing planning issues in the Stroude area.
7 Local Gaps	Policy VW2 on p.25	Basic conditions – A and E	The land proposed for designation as a Local Gap is also designated Green Belt land. It is accepted that a Green Belt designation is not intended to be a landscape protection designation, but in some respects, the designation serves similar purposes to those that the Local Gap evidence proposes, i.e.: to "identify local gaps between the settlements of Virginia Water and Englefield Green and Egham to prevent new development from making them merge into each other". A number of the five Green Belt purposes (set out at paragraph 143 of the NPPF) would help prevent physical coalescence of these settlement areas. The Council therefore queries the justification for the Local Gap designation in terms of maintaining the physical separation of Virginia Water from

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			<p>Englefield Green and Egham, as it duplicates national and Local Plan Green Belt strategic policy requirements, which in the Council's view, provides strong enough protection from inappropriate development in the Green Belt. Although Policy VW2 itself doesn't refer to physical coalescence, the evidence provided to justify the introduction of this policy studies both the need to protect physical and visual coalescence and made its policy recommendations on this basis.</p> <p>The evidence goes on to state the purpose of the Local Gap is to not only strengthen the protection of the physical separation, but also the visual separation, and to protect the distinct character and identity of Virginia Water settlement area. The Council recognises that Green Belt policy requirements are not intended to protect the visual quality of a landscape or address visual impacts of a proposal, however, the PPG (para 013: Reference ID 64-013-20250225) makes it clear that openness is capable of having both spatial and visual aspects – in other words “the visual impact of the proposal may be relevant, as could its volume”.</p> <p>The Local Gap spans across two of the proposed VWNP Design Code Character Areas: Stroude Valley to the east of the railway line, and Callow Hill & The Crown Estate to the west. The Design Code objectives for each of these areas are to conserve their special qualities and rural character, and to maintain a sense of separation from urban areas to the north. Use of the codes will help retain existing mature trees and hedgerows; preserve valued views; and shape built form, heights and green infrastructure in ways that positively reinforce the landscape character of these areas. The Council again questions the need for the Local Gap policy where design codes will deliver similar outcomes, including the prevention of removing vegetation which serves to prevent the visual coalescence of the settlements (second paragraph of Policy VW2 Local Gap). It is the Council's view that policy VW2 also duplicates several strategic policy requirements in the Local Plan which are designed to positively shape development to protect valued landscapes and habitats as follows:</p> <ul style="list-style-type: none"> • The Local Gap is intended to prevent harm through visual coalescence of a valued landscape. Policy EE1: Townscape and Landscape Quality is positively worded in that it supports proposals where they make a positive contribution to the landscape setting, paying regard to the Design SPD. If adopted, proposals will also pay regard to the Neighbourhood Plan Design Code, which is discussed above. The Local Plan already refers applicants to the Surrey Landscape

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			<p>Character Assessment (paragraph 7.3) to understand the landscape qualities of the Borough.</p> <ul style="list-style-type: none"> • The extent of the proposal Local Gap area is designated as a Biodiversity Opportunity Area (BOA). Policy EE11: Green Infrastructure seeks to avoid further habitats fragmentation and restore, maintain and enhance habitat connectivity in these areas; and sets out how significant trees will be protected through the use of Tree Preservation Orders (of which there are several in the Local Gap area). • The Dell to the south of the proposed Local Gap area represents a large area of Ancient Woodland and is a Site of Nature Conservation Importance (SNCI). There are several additional clusters of Ancient Woodland to the east of Callow Hill / south of Prune Hill. Policy EE9: Biodiversity, Geodiversity and Nature Conservation sets out how development proposals affecting these sites will only be granted where the benefits clearly outweigh any harm, and where the hierarchy of mitigation is followed. • Any development proposals located in the proposed Local Gap will be located in the Green Belt as currently designated in the Runnymede 2030 Local Plan. Policy EE14: extensions and alterations to and replacement of buildings in the Green Belt should not materially increase the prominence of the development at the site (thus the visual impacts of development are being assessed here). • In addition, Policy EE17: Infilling or redevelopment proposals on previously developed land in the Green Belt sets out how proposals should consider their relationship with existing landscape features and integration with surroundings, and with views from within and outside the site. • Policy EE18: Engineering Operations in the Green Belt: the extent and visual impact of the changes in land levels will be taken into account in assessing such proposals – any visual effects should not be harmful. <p>In these respects, RBC considers the strategic policies of the NPPF and the Local Plan, including Green Belt policies, to provide sufficient protection against both the physical and visual coalescence of Virginia Water with Egham and Englefield Green, and the Local Gap policy is therefore unjustified. Particularly as the Local Gap Study suggests that the areas in question are made up of extensive woodland – a landscape feature which will serve to maintain visual coalescence and which already attract policy protection.</p>

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			<p>The Council is also embarking on an exercise to update its Green Belt Review to inform the next Local Plan, in accordance with national planning policy and guidance. The Council would be concerned about supporting any Neighbourhood Plan policies which seek to place constraints on this exercise and thus impact the Council's ability to make any appropriate amendments to the Green Belt boundary in the future (if required) to meet its identified need for homes, commercial or other development.</p> <p>The Council also queries whether a Local Gap policy should be addressed through a Neighbourhood Plan, or whether this should be a strategic issue addressed through a higher-tier plan such as a Local Plan. The Council suggests this issue might be better addressed through a strengthened design policy requirement, for example: 'Proposals for new development in the Stroude Valley and Callow Hill & Crown Estate Character Areas should incorporate landscaping to enhance the setting of the development, including the retention of any trees of amenity value, and other significant landscape features of merit, and respect the setting of, and relationship between, settlements and individual buildings in the landscape'.</p> <p>Should the Examiner consider there to be justification of the inclusion of the policy, the Council proposes an amendment to allow some flexibility – in a similar way to Green Belt policy – where substantial weight is given to any effect on visual coalescence but that development proposals could be supported in certain circumstances (for example, for development proposals on Green Belt or Grey Belt sites in the proposed Local Gap area which meet the 'Golden Rules' of the NPPF). This would also allow for development proposals at sites such as the ACS International School and Great Fosters, which would fall within the boundary of the Local Gap, to carry out development which may impact visual coalescence, but which would also provide community / economic benefit which may outweigh any harm.</p> <p>It would also be helpful if the policy or reasoned justification provided more clarity to applicants in terms of what evidence would need to be submitted to demonstrate that visual impacts have been addressed and separation preserved (or impacts mitigated to an acceptable level) – such as a Landscape Character Assessment or Landscape and Visual Impact Assessment - depending on the size and location of proposals.</p>
8 Virginia Water Village Centre	Second paragraph	Basic condition A – conformity with NPPF	Although this would result in a degree of duplication, RBC considers it necessary to reiterate criteria in paragraph 97 of the NPPF which sets out circumstances in which LPAs should refuse applications for hot food takeaways and fast-food outlets.

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	of the policy text	which states that policies should be clearly written and unambiguous and avoid unnecessary duplication of policies that apply in the area.	
10 Active Travel	First paragraph of the policy text	Basic condition A – conformity with NPPF which states that policies should be clearly written and unambiguous	To improve implementation of this policy, should the text be amended to require Transport Assessments / Statements and / or Travel Plans (where required) to take account of the Active Travel Map at Figure 4 when designing opportunities for improved provision?
10 Active Travel	Third paragraph of the policy text	Suggestion	It may be worth futureproofing this policy by removing reference to Surrey County Council and just referring to the Highways Authority, due to impending Local Government reform.
10 Active Travel	Figure 4 on p.36	Suggestion	Whilst it is recognised that Figure 4 puts forward aspirational active travel network improvements, RBC recommends the following are considered: the eastern spur of the proposed cycle route for R2 Trumps Green Road appears to stop at the railway line. Is this correct or is it supposed to meet the public rights of way to the east of the railway line? It is unclear as to how having a cycle route that would arbitrarily stop here would be helpful as it does not appear link to another location? Also, would it be 'neater' to have the western end of this proposed route merged with the existing Public Right of Way that is currently crosses?
11 Highways Environment	Policy VW6 on p.37	Basic conditions – A, D and E	In its current form, this policy seems to just make a statement saying that any schemes that secure developer contributions to deliver highways and public realm improvements

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			which improve highway safety and residential amenity will be supported. RBC questions the necessity of this policy. If deemed necessary, RBC suggests the policy be amended to say that schemes / developments will only be supported if they accord with other policies of the Development Plan for the area too; and to support highways and / or public realm improvements on-site, as well as through off-site developer contributions
12 Green & Blue Infrastructure Network	Policy VW7 on p.39, and paragraph 12.3 on p40	Basic condition – A conformity with NPPF which states that policies should be clearly written and unambiguous, and D	Lack of clarity about what type and nature of development proposals the GBI infrastructure requirements apply to. RBC does not consider it justified or proportionate to require 'all new planning proposals' (para 12.3) to prepare a green and blue infrastructure plan (such as householder proposals, some minor development proposals, advertising consent etc). RBC suggest policy and reasoned justification is amended to provide clarity about what types and scale of development these requirements apply to, based on evidence to justify this. RBC also requires clarity about how the third paragraph of the policy text should be implemented i.e.: 'Where development proposals cannot deliver green and blue infrastructure, opportunities should be identified to offset green and blue infrastructure improvements and enhancements within the Neighbourhood Area, which will be secured by S.106 contributions if necessary.' It is not justified or proportionate to expect all development proposals to meet this requirement; and the Forum have not demonstrated that it is viable for all proposals to offset green and blue infrastructure provision with S106 contributions. In its current form, this policy would not contribute to the achievement of sustainable development as it may hinder delivery of development.
13 Sustainable Building Design	Policy VW8 on p.42	Basic conditions A and D	Local Plan Policy SD7 also supports proposals where they maximise opportunities for passive solar gain and cooling through design. RBC welcomes the idea of demonstrating this has been achieved in an Energy Statement accompanying major development applications, through the use of a passive design capacity assessment. Paragraph 13.3 goes on to explain how designers should evaluate operational energy used; however, Local Plan energy-related policy requirements only deal with regulated energy, which have thus been assessed for viability and feasibility. RBC understands how an assessment of operational energy would be ideal in terms of meeting net zero objectives, but this goes beyond strategic policy requirements. The Council recognises the potential for the performance of new buildings not matching design aspirations. However, RBC requires further clarity on the implementation of this aspect of Policy VW8. Strategic policy requirements in the Local Plan do not seek an

Section	Reference/ page	Suggestion / basic condition	Comment
			<p>uplift to Part L or Part O Building Regulations standards in terms of energy performance and relies instead on the Building Control regime to monitor this. It is outside the scope of planning to ensure the energy performance of a new building complies with Building Regulations standards – a Building Control Authority or approved inspector should be responsible for this. The benefits of carrying out post-occupancy evaluation (POE) are recognised and understood, however, no evidence has been provided to demonstrate that it is feasible, viable or proportionate to require all residential schemes (paragraph 13.5) and ‘all new buildings, no matter what their intended use or size’ to monitor post-occupancy performance or adopt the Passivhaus Planning Package (or equivalent design methodology). Even for major proposals, conducting POE is a resource-intensive requirement, and a more realistic approach would be to monitor a sample of buildings. Even if these policy requirements were to be adopted, the Local Planning Authority would not have the powers or remit to address a poorly performing building once it has been occupied around 12 months or more after completion (when sufficient detail could be provided to make the evaluation worthwhile). Whilst the LPA could encourage the submission of data from (for example) an independent POE consultant, as per the draft VWNP policy requirement, the Council queries whether it would be justified or practical to enforce corrective action where design aspirations are not being achieved. A more practical approach would be to set a clear Housing Quality Mark / Passivhaus standard, which incorporates POE, and to underpin this policy requirement with viability evidence to demonstrate that housing delivery will not be impacted in the Neighbourhood Area. However, without this evidence, and a clear policy requirement for certain types and scales of development, RBC would have difficulty implementing this policy and achieving its aims. Similarly, it is suggested that only major development proposals demonstrate that embodied carbon emissions have been minimised through the methods suggested in the policy text, and that this is demonstrated in the submitted Energy Statement. Paragraphs 13.4 and 13.9 of the draft VWNP makes reference to the Future Homes and Building Standard, but the LPA has limited ability to require, monitor and enforce equivalent standards ahead of the extensive supporting guidance on its implementation being introduced.</p> <p>Update paragraph 13.1 to state that the Council adopted the Toolkit on 21 March 2024. The Council's Net Zero Toolkit encourages new development to achieve standards above and beyond those of the Local Plan (i.e. above the energy performance standards sought</p>

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			<p>by Building Regulations), however, there is insufficient evidence (as yet) to incorporate the achievement of net zero standards, or Passivhaus standards or equivalent, or Future Homes Standards, into planning policy. The Council must also take into account the 2023 Written Ministerial Statement which states:</p> <p><i>‘Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:</i></p> <ul style="list-style-type: none"> <i>• That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.</i> <i>• The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).’</i> <p>If this evidence can be presented, RBC would be supportive of including such a policy for certain types and scales of development in the Neighbourhood Area, to improve energy performance and reduce emissions. However, RBC currently does not have the evidence to suggest that householder or minor development proposals will be able to adopt such standards, or aspects of these standards, without this affecting housing delivery.</p>
14 Community Infrastructure	Policy VW9	Basic condition – A conformity with NPPF which states that policies should be clearly written and unambiguous, and D	RBC would welcome clarity about how ‘all reasonable efforts’ have been achieved – the policy or reasoned justification should be amended to help applicants and DM officers understand how this is demonstrated.
14 Community Infrastructure	Paragraph 14.2 on p.47	Basic condition - E	This paragraph (14.2) requires a 12-month marketing period for community facilities which may be lost to conversion, change of use or loss, as opposed to policies SD6, IE4 and IE14 in the Local Plan for retail / leisure facilities which require six months. This would appear to be a conflict with Local Plan policy, where the Neighbourhood Plan is setting a higher threshold.

Section	Reference/ page	Suggestion / basic condition	Comment
15 Aspirations	Paragraph 15.1 on p.49	Suggestion	Suggest that paragraph 15.1 is amended to explain how this section is intended to identify potential projects for the use of Neighbourhood CIL (and, where relevant and agreed with external infrastructure providers, the use of Strategic CIL funds). To distinguish these aspirations from the preceding policies, RBC suggest they are presented in a different format, although this is not a significant concern.
15 Aspirations	Aspiration VWA2 on p.49	Suggestion	RBC suggest this aspiration is amended to state how the Forum will actively engage with the LPA and Highways Authority where they are consulting on planning applications, to inform Construction Management Plans which aim to reduce the number of heavy goods vehicles on roads in the village. This would improve the achievement of this aspiration.
15 Aspirations	Station Approach and Station Parade section p.51	Suggestion	The 4th bullet point does not specify whether the proposed crossing relates to Station Approach or Parade so this needs to be clarified. Or is it to the station, e.g. the train station? This clarity would also be useful for the 5 th bullet point below.

Policy maps

Section	Reference/ page	Suggestion / basic condition	Comment
10 Active Travel	Figure 4 on p.36	Suggestion	Whilst it is recognised that Figure 4 puts forward aspirational active travel network improvements, RBC recommends the following are considered: the eastern spur of the proposed cycle route for R2 Trumps Green Road appears to stop at the railway line. Is this correct or is it supposed to meet the public rights of way to the east of the railway line? It is unclear as to how having a cycle route that would arbitrarily stop here would be helpful as it does not appear link to another location? Also, would it be 'neater' to have the western end of this proposed route merged with the existing Public Right of Way that is currently crosses?
12 Green & Blue Infrastructure Network	Figure 6 on p.41	Suggestion	The lighter green dots showing The Windsor Forest & Great Park Special Area of Conservation is lost under the Virginia Water Great Park (public park) layer which is above it – the colours / pattern used to display these areas could be improved to improve clarity.

Evidence base documents

The only evidence base document that appears to have been updated since the Regulation 14 consultation is the Design Code which has been addressed separately below. The others have not been adjusted since this time, for example, the Community Infrastructure document. On that basis, the Council's previous comments submitted as part of the Regulation 14 consultation still stand.

Section	Reference/ page	Suggestion / basic condition	Comment
Community Infrastructure	p.p.8-9	Suggestion	This document should be updated to remove the references to Merlewood Care Home, Signature Care Home and McCarthy Stone Retirement living as these no longer feature in Policy VW.9 Community Facilities.

Design Code

Section	Reference/ page	Suggestion / basic condition	Comment
Introduction	Paragraph 1.7 on p.1	Basic condition - E	As per comments made above, RBC would welcome clarity on the status of the Design Code document. Paragraph 1.7 states that the Design Code will be monitored and updated as necessary – this may be possible if it is intended as a Supplementary Planning Document, but not if its codes are intended to act as policy requirements (in which case it should be reviewed and updated as part of a wider Neighbourhood Plan review).
Introduction	Paragraph 1.4 on p.1	Suggestion	Refers to the '2020 Runnymede Borough Local Plan' when this should be the 'Runnymede 2030 Local Plan'. Change needed for accuracy.
Virginia Water description	Paragraph 2.1 (p.2)	Basic conditions – A and E	This refers to Trumps Green etc. as a 'village' where the Local Plan simply refers to Virginia Water and does not recognise these areas as separate settlements. It also could result in unintended consequences in relation to paragraph 154(e) of the NPPF which refers to allowing 'limited infilling' in the Green Belt in villages. This should be changed to be consistent with the terminology in the Local Plan.
Map of character areas	p.3	Suggestion	RBC suggest this map is amended to provide letter labels (e.g. A, B etc.) for each character area to make the map clearer and improve link with design codes.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A1 on p.4	Basic condition - A	As per comments in the table above, the third line in the box below the table title needs to be removed (as it conflates design matters with Green Belt policy); or at least amended to state: '...means that new development must accord with national and Local Plan Green Belt policy requirements'.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A2(i)	Basic conditions – A and D	RBC is concerned that the following code is very restrictive, and queries whether there is evidence to justify this height restriction: 'i. The height of new dwellings should not be greater than the tallest of one or both adjoining dwelling(s).'
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A4(i)-(iii)	Basic condition – A	In this code, and throughout the Design Code document, RBC would welcome more clarity on what 'must acknowledge' means in practice, and how complying with this code would be achieved / demonstrated. Also, for point (iii), clarity is needed as to which locations are being referred to. The National Model Design Code recommends using diagrams / images / maps to accompany text to provide certainty about what features must be acknowledged / responded to in design terms (a good example is in the Thorpe Neighbourhood Plan, where maps indicate where specific views should be taken into account in designs). In its

Section	Reference/ page	Suggestion / basic condition	Comment
			current form, a DM officer would have difficulty assessing whether this code is achieved.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A5 (ii) and (iii)	Basic condition – A and D	RBC believes it is unrealistic for all development proposals to ‘contribute to delivery of multifunctional GBI network’ and ‘reverse the decline in biodiversity and result in a ‘net gain’’. To improve clarity, and to implement this in a proportionate way, RBC suggest these codes refer only to major development proposals or proposals over a certain size e.g. 1,000sqm. It should also be phrased to accord with national BNG thresholds and requirements.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A6(i)	Basic condition - D	Amend to provide clarity – to what should spaces be ‘sympathetic’ and ‘proportionate’ – to nearby buildings? Also, it is suggested that the WERC requirements are replicated here and translated into design codes, so they are captured in this document rather than an unadopted document which has not been consulted on (and can therefore only be given limited weight in decision making).
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A7(ii)	Basic condition - E	This code refers to ‘adversely affect neighbouring properties’. This needs to specified in terms of harm to amenity or highways safety.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A7(iii)	Basic condition - E	This code states: ‘iii. Proposals for new driveways across verges must be constructed to an approved specification.’ It is unclear what is meant by ‘an approved specification’ in terms of who specifies and subsequently approves said specification.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A8(i)	Suggestion	This code currently states that proposals should not affect the privacy of a neighbour’s house and garden. RBC suggests amending this as follows: ‘i. Proposals should not significantly adversely affect the privacy of a neighbour’s house and garden or significantly adversely affect neighbours outlook.’
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A8(iv)	Suggestion	This code relates to Wentworth Estate covenants and contractor requirements – RBC does not consider these to be planning matters, and this code should therefore be removed.

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WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA A	A9(ii)	Suggestion	Clarity required about to what extent should electronic gates and piers be set back - is there a specific measure? RBC suggest this could this signpost to Surrey County Council's Design Codes 'Healthy Streets for Surrey' which identify useful measures.
WENTWORTH ESTATE EAST – NON- GREEN BELT CHARACTER AREA B	B1(ii)	Basic condition - D	This code states: 'ii. Proposals must not lead to new buildings or existing buildings extending in front of any building line to the plot frontage that is common to both adjoining buildings'. RBC considers that this is too prescriptive and could restrict development such as porches or canopies.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA B	B4(i)	Suggestion	Is this code referring to materials in the local area? If so, this should be clarified.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA B	B5(i)-(iii)	Basic condition - A	In this code, and throughout the Design Code document, RBC would welcome more clarity on what 'must acknowledge' means in practice, and how complying with this code would be achieved / demonstrated. Also, for point iii, clarity is needed as to which locations are being referred to. The National Model Design Code recommends using diagrams / images / maps to accompany text to provide certainty about what features must be acknowledged / responded to in design terms (a good example is in the Thorpe Neighbourhood Plan, where maps indicate where specific views should be taken into account in designs). In its current form, and DM officer would have difficulty assessing that this code is achieved.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA B	B6 (ii) – (iii)	Basic condition – A and D	RBC believes it is unrealistic for all development proposals to 'contribute to delivery of multifunctional GBI network' and 'reverse the decline in biodiversity and result in a 'net gain''. To improve clarity, and to implement this in a proportionate way, RBC suggest these codes refer only to major development proposals or proposals over a certain size e.g. 1,000sqm. It should also be phrased to accord with national BNG thresholds and requirements.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA B	B7(i)	Suggestion	Unclear what is meant by 'proportionate' and 'imbalance' here. Clarity is required.

Section	Reference/ page	Suggestion / basic condition	Comment
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA B	B8(iii)	Basic condition - E	This text states: 'iii. Proposals for new driveways across verges must be constructed to an approved specification.' It is unclear what is meant by 'an approved specification' in terms of who specifies and subsequently approves said specification.
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA B	B9(i)	Suggestion	This code currently states that proposals should not affect the privacy of a neighbour's house and garden. RBC suggests amending this as follows: 'i. Proposals should not significantly adversely affect the privacy of a neighbour's house and garden or significantly adversely affect neighbours outlook.'
WENTWORTH ESTATE WEST – GREEN BELT CHARACTER AREA B	B9(iii)	Suggestion	This code relates to Wentworth Estates covenants and contractor requirements – RBC does not consider these to be planning matters, and this code should therefore be removed.
ST. ANN'S & VIRGINIA PARK (VIRGINIA WATER EAST) CHARACTER AREA C	C1(ii-iii)	Suggestion	The inclusion of a map showing where these are located would improve clarity and the implementation of these codes.
ST. ANN'S & VIRGINIA PARK (VIRGINIA WATER EAST) CHARACTER AREA C	C2(ii)	Basic condition - D	RBC is concerned that this code is too prescriptive and restrictive on a small number of properties, and queries whether the Design Code has been developed in consultation with the owners of the properties affected.
ST. ANN'S & VIRGINIA PARK (VIRGINIA WATER EAST) CHARACTER AREA C	C4(i)	Basic condition - D	RBC is concerned that the following code is very restrictive, and queries whether there is evidence to justify this height restriction: 'i. Proposals should be of no more than three storeys in height unless there is local precedence for taller buildings in the immediate vicinity.'
ST. ANN'S & VIRGINIA PARK (VIRGINIA WATER EAST) CHARACTER AREA C	C6(i)	Basic condition – D	RBC would welcome clarity on what is special about the junction, and how proposals should acknowledge it. Amendments would be welcome to ensure the code specifically enables an applicant or DM officer to understand how the design of a development must respond to landmarks, gateways, focal points and corners etc.

Section	Reference/ page	Suggestion / basic condition	Comment
ST. ANN'S & VIRGINIA PARK (VIRGINIA WATER EAST) CHARACTER AREA C	C7 (i)	Basic condition – A and D	This needs a map to clarify the area referred to. Also, the text should be amended to be 'proposals will be supported if they retain...' so that it is positively worded, as required by national policy.
ST. ANN'S & VIRGINIA PARK (VIRGINIA WATER EAST) CHARACTER AREA C	C7 (ii) – (iii)	Basic condition – A and D	RBC believes it is unrealistic for all development proposals to 'contribute to delivery of multifunctional GBI network' and 'reverse the decline in biodiversity and result in a 'net gain''. To improve clarity, and to implement this in a proportionate way, RBC suggest these codes refer only to major development proposals or proposals over a certain size e.g. 1,000sqm. It should also be phrased to accord with national BNG thresholds and requirements.
TRUMPS GREEN (INCLUDING TROTSWORTH AVENUE AND MORELLA CLOSE) CHARACTER AREA D	D1(i)	Basic condition D	RBC is concerned that this is straying into strategic policy on housing delivery, rather than design. Restricting plot sub-division will not help achieve sustainable development. DM officers must take into account other material considerations set out in Local Plan and national policy e.g. giving substantial weight to the efficient use of land and achieving efficient densities.
TRUMPS GREEN (INCLUDING TROTSWORTH AVENUE AND MORELLA CLOSE) CHARACTER AREA D	D2(iii)	Basic condition - D	The code states: 'iii. Proposals for new dwellings on Trotsworth Avenue and Morella Close should have a detached form.' RBC is concerned that this code is overly prescriptive and does not conform with national or Local Plan policy which seeks the efficient use of land, and for a housing mix which reflects needs.
TRUMPS GREEN (INCLUDING TROTSWORTH AVENUE AND MORELLA CLOSE) CHARACTER AREA D	D3(ii)	Basic condition - D	This code states: 'ii. New dwellings on Trotsworth Avenue should be of single storey character to maintain the Wentworth Estate character of rural and visual openness.' Trotsworth avenue contains numerous buildings which are not single storey, and RBC therefore considers this to be unduly restrictive on future development.
TRUMPS GREEN (INCLUDING TROTSWORTH AVENUE AND MORELLA CLOSE)	D4(i)	Suggestion	Is this referring to materials in the local area? If so, this should be clarified.

Section	Reference/ page	Suggestion / basic condition	Comment
CHARACTER AREA D			
TRUMPS GREEN (INCLUDING TROTSWORTH AVENUE AND MORELLA CLOSE) CHARACTER AREA D	D5(i)	Basic condition - D	RBC would welcome further clarity on what is special about the junction, and how proposals should acknowledge it? Amend this code to provide certainty about how a development should be designed to use landmarks, gateways, focal points and corners to create variety.
TRUMPS GREEN (INCLUDING TROTSWORTH AVENUE AND MORELLA CLOSE) CHARACTER AREA D	D6 (vii) – (ix)	Basic condition – A and D	RBC believes it is unrealistic for all development proposals to ‘contribute to delivery of multifunctional GBI network’ and ‘reverse the decline in biodiversity and result in a ‘net gain’’. To improve clarity, and to implement this in a proportionate way, RBC suggest these codes refer only to major development proposals or proposals over a certain size e.g. 1,000sqm. It should also be phrased to accord with national BNG thresholds and requirements.
CALLOW HILL & THE CROWN ESTATE CHARACTER AREA E	E1 on p.14	Basic condition – A and E	As per comments in the table above, the second line in the box below the table title needs to be removed (as this conflates design matters with Green Belt policy); or at least amended to state: ‘...means that new development must accord with national and Local Plan Green Belt policy requirements’.
CALLOW HILL & THE CROWN ESTATE CHARACTER AREA E	E1(i)-(v)	Basic condition - D	RBC suggests a map is included to show the location of these properties. The phrase ‘retain the built form’ is overly perspective. RBC suggests this is changed to ‘protect and where possible, enhance’, to allow development to take place. These properties are not currently Locally Listed Buildings – the Forum may want to consider exploring a formalised designation.
CALLOW HILL & THE CROWN ESTATE CHARACTER AREA E	E2(i)	Suggestion	Suggest the wording be changed from ‘consider the dominance of’ to ‘use’.
CALLOW HILL & THE CROWN ESTATE CHARACTER AREA E	E3(i)	Suggestion	Unclear what is meant by ‘punctuating views’, and where, from the south? A map would be useful for identifying the property and these views.
CALLOW HILL & THE CROWN ESTATE CHARACTER AREA E	E4(ii) – (iii)	Basic condition – A and D	RBC believes it is unrealistic for all development proposals to ‘contribute to delivery of multifunctional GBI network’ and ‘reverse the decline in biodiversity and result in a ‘net gain’’. To improve clarity, and to implement this in a proportionate way, RBC suggest these codes refer only to major development

Section	Reference/ page	Suggestion / basic condition	Comment
			proposals or proposals over a certain size e.g. 1,000sqm. It should also be phrased to accord with national BNG thresholds and requirements.
VILLAGE CENTRE CHARACTER AREA F	Introduction	Suggestion	The wording here seems to restrict innovation and change. RBC suggest this could be more positively worded.
VILLAGE CENTRE CHARACTER AREA F	F1(i)	Basic condition - D	The text here needs to be amended to provide clarity that where the proposal requires planning permission this will apply but cannot apply where Permitted Development rights are in force. This includes most changes of use due to Use Class E.
VILLAGE CENTRE CHARACTER AREA F	F1(ii)	Basic condition - D	Suggest that this code is amended so that proposals' scale and massing can be complementary to existing buildings rather than subservient.
VILLAGE CENTRE CHARACTER AREA F	F2(ii)	Basic condition - D	RBC is concerned that the following code is very restrictive, and queries whether there is evidence to justify this height restriction: 'ii. Proposals around Station Parade may be up to five storeys in height.' This could also conflict with F2(i) code above.
VILLAGE CENTRE CHARACTER AREA F	F5(i)	Basic condition - D	The text here needs to be amended to provide clarity that where the proposal requires planning permission this will apply but cannot apply where Permitted Development rights are in force. This includes most changes of use due to Use Class E.
VILLAGE CENTRE CHARACTER AREA F	F5(i)-(ii)	Basic condition - D	These are not design-related matters but are straying into land-use requirements which should be addressed in a Neighbourhood Plan policy.
VILLAGE CENTRE CHARACTER AREA F	F2(ii)-(iii)	Basic condition – A and D	RBC believes it is unrealistic for all development proposals to 'contribute to delivery of multifunctional GBI network' and 'reverse the decline in biodiversity and result in a 'net gain''. To improve clarity, and to implement this in a proportionate way, RBC suggest these codes refer only to major development proposals or proposals over a certain size e.g. 1,000sqm. It should also be phrased to accord with national BNG thresholds and requirements.
VILLAGE CENTRE CHARACTER AREA F	F6(i)	Basic condition – A and D	Suggest this is amended to allow for proposals which may enhance the public open space to make it positively worded.
VILLAGE CENTRE CHARACTER AREA F	F7(i)	Basic condition – A and D	This code conflicts with elements of the RBC parking standards set out in the Council's Parking Standards SPD and with Local Plan Policy SD4 requiring Transport Assessments - these assessments may set out a justification for reduced parking.

Section	Reference/ page	Suggestion / basic condition	Comment
VILLAGE CENTRE CHARACTER AREA F	F7(ii)	Basic condition - E	The text should be amended to state that proposals which install EV chargers will be supported provided they meet relevant policy requirements in the wider Development Plan.
STROUDE VALLEY CHARACTER AREA G	G1 on p.18.	Basic condition – A and E	As per comments in the table above, the second line in the box below the table title needs to be removed (as it conflates design matters with Green Belt policy); or at least amended to state: ‘...means that new development must accord with national and Local Plan Green Belt policy requirements’.
STROUDE VALLEY CHARACTER AREA G	G1(i)	Basic condition - D	In this code, and throughout the Design Code document, RBC would welcome more clarity on what ‘must acknowledge’ means in practice, and how complying with this code would be achieved / demonstrated. The National Model Design Code recommends using diagrams / images / maps to accompany text to provide certainty about what features must be acknowledged / responded to in design terms (a good example is in the Thorpe Neighbourhood Plan, where maps indicate where specific views should be taken into account in designs). In its current form, and DM officer would have difficulty assessing that this code is achieved.
STROUDE VALLEY CHARACTER AREA G	G2(i)-(ii)	Basic condition - D	RBC is concerned that this strays into housing policy rather than design policy and may restrict the delivery of homes which meet identified needs. The code should provide flexibility for well-designed housing types of a different nature, if this reflects the character of the area. A map would also be useful to identify the locations.
STROUDE VALLEY CHARACTER AREA G	G3(i)	Basic condition - D	RBC is concerned that the following code is very restrictive, and queries whether there is evidence to justify this restriction across the whole of the Stroude Valley: ‘i. Proposals should be no more than two storeys in height.’
STROUDE VALLEY CHARACTER AREA G	G4(i)-(iv)	Basic condition - D	RBC suggests a map is included to show the properties cited, and the views referred to. This would improve clarity. The use of the word ‘acknowledge’ is again unclear. This should be amended. For part iii – it would be difficult for applicants to demonstrate that they have acknowledged the role of the buildings in this location to forming the gateway to this part of the village in a planning application. A Design Code should tell officers and applicants what the roles of the buildings are; what is important about the

Section	Reference/ page	Suggestion / basic condition	Comment
			views; and what design aspects should be incorporated to enhance those valued elements.
STROUDE VALLEY CHARACTER AREA G	G5(i)	Basic condition – A and D	This code should be amended to clarify that this does not apply where development is delivered under Permitted Development rights. As it currently stands this is not positively worded. This includes most changes of use due to Use Class E.
STROUDE VALLEY CHARACTER AREA G	G5(ii)	Basic condition – A and D	This is a land-use planning policy, not a design code matter, and thus should be removed. The code should be seeking to set out how any residential use here should be designed, rather than providing support for the principle of development at this location. However, if this code is retained, a map showing the location of this site would help clarify where it is.
STROUDE VALLEY CHARACTER AREA G	G6(ii)-(iii)	Basic condition – A and D	RBC believes it is unrealistic for all development proposals to ‘contribute to delivery of multifunctional GBI network’ and ‘reverse the decline in biodiversity and result in a ‘net gain’’. To improve clarity, and to implement this in a proportionate way, RBC suggest these codes refer only to major development proposals or proposals over a certain size e.g. 1,000sqm. It should also be phrased to accord with national BNG thresholds and requirements.

Development Plan Documents

In Runnymede, a number of policy documents are used to guide the location and other aspects of future development. The policies in these documents are important in deciding planning applications. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that decisions are made in accordance with the Development Plan unless material considerations indicate otherwise.

Regional Policy

The South East Plan was partially revoked on 25th March 2013. [Policy NRM6](#) that deals with the Thames Basin Heaths Special Protection Area remains in place.

Local Policy

This comprises the following plans:

- [2030 Local Plan \(16 July 2020\)](#) - A high level document containing the Council's long-term aspirations for the Borough, and policies to guide and manage development in Runnymede until 2030. A range of Supplementary Planning Documents (SPDs) have been produced to build upon and provide more detailed advice or guidance on policies of the Local Plan, and these are available at: [Supplementary Planning documents and other guidance – Runnymede Borough Council](#).
- [The 2030 Local Plan Policies Map](#) - Shows 2030 Local Plan designations, including sites allocated for development.
- Adopted Neighbourhood Plans: Thorpe: [Thorpe Neighbourhood Plan](#), Englefield Green: [Englefield Green Village Neighbourhood Plan](#).
- [Surrey County Council's Minerals and Waste Development Framework](#) – a portfolio of plans and related documents that provide the blueprint for future mineral extraction and waste management in Surrey. The Framework comprises the following adopted Plans:
 - Surrey Waste Local Plan 2019-2033
 - Surrey Minerals Plan Core Strategy Development Plan Document 2011
 - Surrey Minerals Plan Primary Aggregates DPD
 - Surrey Minerals Plan Minerals Site Restoration SPD
 - Aggregates Recycling Joint DPD for the Minerals and Waste Plans 2013

It should be noted that Surrey County Council is preparing a [new Minerals and Waste Local Plan](#) for Surrey which will replace the existing Surrey Minerals Plan 2011 and the Surrey Waste Local Plan. The issues and options public consultation was completed in March 2022, and a preferred options consultation on the 'Regulation 18 Draft Minerals and Waste Local Plan' is due to take place in June 2023.