

Email: [REDACTED]



Planning Policy Team,
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Sent by email to: planningpolicy@runnymede.gov.uk

9th October 2025

Dear Sir or Madam,

Virginia Water Neighbourhood Plan Submission Version Consultation

Thank you for consulting Surrey County Council (SCC) on the draft Virginia Water Neighbourhood Plan. This is an officer response reflecting this council's key roles. The submission version plan has been shared with relevant SCC teams. Our ecology, transport development planning and climate change teams thank the Virginia Water Neighbourhood Forum for taking on board some of our previous comments at the Regulation 14 consultation (see annex) and have no further comments to make at this time. We have the following comments from our flood risk and minerals and waste teams.

SCC Lead Local Flood Authority Comments

Our previous comments in response to the Regulation 14 consultation have not been addressed by the neighbourhood forum. Although the requirements to include Sustainable Drainage Systems (SuDS) on all new development are set out by National Planning Policy (NPPF) it is important that this requirement is included within the plan. Other specific comments in relation to watercourse (in addition to main rivers) are important points to highlight to future developers and ensures development is in accordance with the Land Drainage Act and national policy. Highlighting the importance and multifunctionality to SuDS as part of the neighbourhood plan is crucial to ensure multiple benefits can be delivered in addition to ensuring flood risk is not increased.

SCC Minerals and Waste Planning Authority (MWPA) Comments

The MWPA notes that there has been an omission of all SCC Development Plan Documents (DPDs) from the Development Plan list (Chapter 1) for Runnymede. Please see list below of the documents which have been omitted, and which require inclusion:

- Surrey Waste Local Plan 2020 (December 2020).
- Surrey Minerals Plan Core Strategy 2011 (July 2011).
- Surrey Primary Aggregates Development Plan Document 2011 (July 2011).
- Surrey Minerals Site Restoration Supplementary Planning Document 2011 (July 2011).
- Surrey Aggregates Recycling Joint Development Plan Document 2013 (February 2013).

I hope these comments are helpful. If you require further information, please contact [REDACTED]
[REDACTED] at [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Surrey County Council

Annex

Email: [REDACTED]



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Sent by email to: [REDACTED]

19 March 2024

Dear Sir or Madam,

Virginia Water Neighbourhood Plan consultation

Thank you for consulting Surrey County Council (SCC) on the Virginia Water Neighbourhood Plan. This is an officer response reflecting this council's key roles.

Flood risk

We would recommend that reference is made to Sustainable Drainage Systems (SuDS). The integration of SuDS in developments not only contributes to a reduction in surface water flood risk but can make spaces more resilient in other ways such as cooling in the summer, improving air quality, biodiversity and water quality. We would also suggest that the document refers to the mapped surface water flood risk that exists within the area and the opportunities created through development to better manage and reduce this risk. The Neighbourhood Plan provides the opportunity through development to reduce surface water flood risk and this should be included within the document.

Section 3.3.4 on waterways acknowledges fluvial flood risk, but there is no consideration to surface water flood risk. This section should also include reference to Ordinary Watercourses. An Ordinary Watercourse is any river, stream, brook, ditch, drain, culvert, pipe and any other passage through which water may flow which is not designated as Main River. It does not have to be recorded on a map to be an ordinary watercourse and commonly is not. This section should refer to the consent process required for any changes to ordinary watercourses and riparian responsibilities. See our SCC links: [Ordinary watercourse consents - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/ordinary-watercourse-consents) [Living next to a watercourse - your rights and responsibilities - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/living-next-to-a-watercourse).

Section 4.2 on objectives includes 'Encourage development based on sustainability' linked to Runnymede 2030 Local plan policy SD7. However, this policy does not include sustainable

drainage systems. We would recommend that the use of SuDS is listed as one of the objectives and where practicable is included within all new developments.

Section 2.3 on sustainable development should make reference to the use of SuDS and the associated benefits.

In section 6.2 to address the key issues in each neighbourhood, consideration should be given to retrofitting and the inclusion of sustainable drainage systems into existing developed areas which will offer multi-functional benefits. Where changes are being made to existing infrastructure there should always be consideration of opportunities to integrate SuDS.

Ecology

We would recommend that reference is made to Biodiversity Net Gain (BNG) which became a “legal requirement to most ‘major’ developments from 12th February 2024, and is due to come into force for other smaller developments from 2nd April 2024” which is enforced by the Environment Act 2021.

We would also recommend that the document refers to the Local Nature Recovery Strategy (LNRS) (emerging) for Surrey. As responsible authority for the LNRS, SCC seeks the Virginia Water Neighbourhood Forum’s support for protecting and enhancing biodiversity through the Neighbourhood Plan. A requirement of the Environment Act 2021 is the production of a LNRS in a collaborative and evidence-based manner and the engagement process for this commenced in 2023, with the aim to complete the strategy by 2024. We would welcome Virginia Water’s involvement in this process to ensure local opportunities for nature recovery are identified and linked into a network for greater ecological resilience.

In Section 3.3.2 on biodiversity, we recommend referring to Chobham Common as Lowland Heathland rather than coniferous heathland as this better represents the special habitat on site. Additionally, it would be worth mentioning that it is the largest National Nature Reserve (NNR) in the southeast of England, is part of the Thames Basin Heaths Special Protection Area (SPA) and also part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC).

At present no objectives/aims in Section 4.2 refer to biodiversity. We would recommend creating an aim such as ‘Development proposals should align with and contribute to the delivery of the Local Nature Recovery Strategy (emerging), to maximise nature recovery in the local area’ and ‘Development proposals should produce a positive net gain of at least 10% biodiversity’.

We would suggest considering the inclusion of a policy which refers to Delivering a Net Gain for Biodiversity and supporting the implementation of the Local Nature Recovery Strategy. This could link with Policy VW.9 Virginia Water Green and Blue Infrastructure Network and therefore Policy EE9 Biodiversity, Geodiversity and Nature Conservation of the Runnymede 2030 Local Plan.

We recommend adding in a sentence to Policy VW.9 stating planting requirements of using native species and/or climate resilient species, particularly in section B.

Transport

We support the commitment to reduce traffic in the area and improve pedestrian and cycle links and recognise that this aligns with the ambitions of Surrey’s Local Transport Plan (LTP4). We support the references to the improved pedestrian and cycle environment, particularly those that connect to the existing identified [LCWIP routes](#). A phase 1 cycle route connecting Egham to Virginia Water is currently in feasibility design stage and will be

consulted on in the coming year. Other routes will be progressed following this and connect into the routes shown in the plan.

We also support the references to add greening and seating to areas such as Trumps Green parade, to be designed in line with Surrey's Healthy Streets design guide.

The Neighbourhood Plan must be compliant with [Healthy Streets for Surrey](#), which is the county's street design policy adopted in 2022 and now presented as a webtool. Its contents must be integrated into any design code included in the Neighbourhood Plan for new developments and street retrofit/ redevelopment situations.

In Surrey, we want streets that are welcoming, safe and attractive for all to access and enjoy. Our Healthy Streets for Surrey raises the standard of street design, creating streets which are safe, green, beautiful, and resilient in line with the ambitions of the Community Vision for Surrey 2030.

It includes national and local guidance and policies and is presented as:

- **'Musts'** (mandatory requirements)
- **'Shoulds'** (requirements that require justification to deviate from)
- **'Coulds'** (recommendations for street design in Surrey)

This will be supported by the Local Street Improvements programme being undertaken by SCC which looks to emphasise the importance of streets and places for people and not just their importance for the movement of vehicles. The [measures used](#) will depend on the context of the area and stakeholder support but could include greening, safer and more accessible cycling and walking infrastructure such as widened pavements and new crossing points, new community spaces and seating.

It is unclear which wording in policies VW.6, VW.7 and VW.8 are policy statements and which wording is supporting text. We would recommend that these policies are amended so that the policy wording is separated from the text in clear boxes. This approach should be used consistently throughout the plan.

VW.6 Active Travel

We would recommend that policy VW.6 Active Travel, clearly states the measures which are expected for development proposals. We would recommend wording as below:

For proposed new developments within the Plan area that will require the submission of a Transport Assessment/Statement and/or a Travel Plan in order to assess the impacts of the development upon the highway and transport network in the surrounding area, any necessary mitigation measures should be identified to secure improvements for pedestrians and cyclists. Such measures may include new or improved footpath and cycleway links.

All such improvements should be designed in accordance with the policies and guidance of Surrey County Council as Highways Authority and should seek to reflect the character of the area and, where appropriate, the local heritage.

VW.7 Traffic Management

We would recommend that policy VW.7 Traffic Management is amended to make the policy wording clearer. Wording such as that below could be included in a standalone VW.7 policy or included as part of VW.6:

The Neighbourhood Forum will support schemes and developments that implement the Runnymede Local Plan Policy SD3 and secure funding including developer contributions to deliver public realm improvements as set out below/in annex <to be included with maps>.

VW.8 Heavy Goods Vehicles

We would recommend that Policy VW.8: Heavy Good Vehicles is amended or deleted. We support the principles in this policy to reduce the size and quantity of vehicles using roads that they were not designed for, as well as keeping construction traffic to routes that are best designed for them. However, the implementation of this policy is impractical.

Routing plans as part of Construction Environmental and Traffic Management Plans that are secured through planning conditions are difficult to enforce. Planning Enforcement Teams find these plans impractical to enforce and the Highways Authority is unable to enforce for specific construction traffic streams.

Likewise, enforcing a 3.5 ton limit would require a Traffic Regulation Order and this would ban all vehicles of that size and above, including removal lorries (if a resident wanted to move house), deliveries of e.g. gardening materials alongside any private vehicles that breach this limit. Hence, the Traffic Regulation Order would be impractical and unlikely to be supported by all residents and other stakeholders.

Our Transport Development Planning team would be happy to discuss these policies further with the Virginia Water Neighbourhood Forum.

Climate Change and Heritage

We support policy VW10 on Net Zero Carbon Building Design which strongly links with SCC's countywide net zero planning programme and Runnymede Borough Council's climate change ambitions. The policy provides a strong and comprehensive suite of statements which enable the realisation of Net Zero development through industry acknowledged standards and carbon budgeting requirements under the Planning and Climate Change Acts and national planning policy. In addition, the policies have purposely considered the full building lifecycle implications and requirements of achieving Net Zero development which crucially references post development and occupancy evaluation of energy efficiency performance targets. The five-part policy explanation following points A – E outlines a robust rationale and reasoning to both the policy requirements and the basis for setting the proposed standards.

We would recommend that additional statements are added which:

- account for the variances in energy consumption across domestic and non-domestic buildings.
- make reference to the upcoming changes to building regulations between the current 2021 Part L update (SAP energy efficiency rating framework) and the Futures Homes Standard's Home Energy Model which will replace SAP by 2025 (projected). It may be difficult to include this adjustment in specific policy objectives, however it could be mentioned that higher standards (and updated energy efficiency measuring baseline) are forthcoming in the policy explanation section and will hence influence policy VW.10 over its lifetime.
- add a minimum standard close to the indicators referenced in the policy or alternately draw these out as a general requirement to prevent a bottom out pass if Passivhaus is not feasible. i.e. Policy requirement - Passivhaus Premium, Minimum viable alternative - LETI / Passivhaus Plus

We note that the policy calls for the submission of Whole Life-Cycle Carbon Emission Assessments related to the construction and use of a building over its entire life. Where existing buildings are present on a site, the embodied carbon within any standing structures should be factored in. Retrofitting and refurbishing buildings is by some degree a more carbon-neutral activity than demolition and construction. We would therefore recommend that this policy is expanded to include stronger references to the benefits of retaining and retrofitting of existing buildings on a site rather than starting from scratch, and “whole-life” carbon assessments should include the entirety of the development process being considered – not just the proposed future building as is suggested here.

Minerals and Waste

We welcome the reference made to the Surrey Minerals and Waste Development Framework and for applicants to have regard to such.

General mapping/plan comments

We would recommend that the paragraphs of the NPPF listed in paragraph 2.1 are checked to ensure that they match the latest version of the [NPPF](#) which was published in December 2023. The flood risk paragraphs are 165 to 175 (not 155-158). The bullets could refer to NPPF Paragraph 180(c) which provides protection for ancient woodland and ancient or veteran trees (which can have significant cultural heritage value in addition to biodiversity value).

Some of the information in the maps/figures is of a poor resolution and the keys are difficult to read. For example, figure 22 is very difficult to interpret. We are unclear as to whether ordinary Watercourses are included in figure 24.

In paragraph 5.1 on the consultation process, SCC should be listed under the bodies consulted.

We would recommend that section 9 on the Virginia Water Neighbourhood History is included at the start before the policies. These paragraphs could be included in section 3.4: Historical Heritage.

I hope these comments are helpful. If you require further information, please contact [REDACTED] at [REDACTED]

Yours sincerely,

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[REDACTED]
Surrey County Council