

Planning Policy Team

Runnymede Borough Council
Runnymede Civic Centre
Station Road,
Addlestone
KT15 2AH

BY EMAIL ONLY:- planningpolicy@runnymede.gov.uk

Dear Sir / Madam,

**RE: Town and Country Planning Act 1990, as amended by the Localism Act 2011
The Neighbourhood Planning (General) Regulations 2012 (As Amended)
VIRGINIA WATER NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION**

These representations are submitted by Tarmac Trading Limited ('Tarmac') in response to the Regulation 16 Consultation on the Virginia Water Submission Neighbourhood Plan 2025-2035.

Tarmac is the UK's leading sustainable building materials group. It owns sites up and down the country, many of which are no longer used for mineral extraction or operations. Many of these sites often provide a very real opportunity to create new opportunities for people and communities. In this case, Tarmac own land within the designated neighbourhood area. This is shown on the Plan which is enclosed within the email and comprises of land at Longside Lake.

Tarmac are very supportive of the adoption of a Neighbourhood Plan in this area. Neighbourhood Plans are an important tool to help residents to achieve a flourishing and sustainable community with a safe, high-quality environment with a diverse range of local businesses, recreational facilities, and amenities.

The majority of the Plan appears sound, sensible and in general accordance with both the Local Development Plan and National Planning Policy Framework. However, Tarmac wish to raise concerns regarding three specific policies.

Policy VW9 – Community Facilities

Tarmac are firm in our position that Longside Lake is not suitable for designation under Policy VW9 as a community facility. Furthermore, we would like to see a more positively prepared view regarding Policy VW9 and the Supporting Policy Text within Section 14 of the Neighbourhood Plan.

It is understood that Longside Lake is deemed by the Parish to be a community facility at present. However, when reviewing the remainder of the list, with the exception of Wentworth Golf Course (which is wholly incomparable to this site), the other sites are clear community facilities for the local residents, which can be accessed at low cost with relative free will and provide important community benefits within the neighbourhood area. Longside Lake is different to this. It is a commercial enterprise with access limited to paid leisure activities. The water sports offering is beneficial but it does not provide an essential community use nor is it widely accessible at free will to the general public. Whilst there are 2 Public Right of Ways that enter the site, these only run for a mere 450 within the site boundary (the lake parameter is 2km alone) and do not provide general public access to the wider lake area. The site is merely a private land leased from Tarmac by Longside Lake Watersports and CJM Ski & Wake to operate a commercial operation. Whilst there is a paid-for leisure use on the site, this is not a facility open to the general public. Designating the site as a community facility imposes restrictive conditions that could hinder the growth and diversification of the existing leisure business. We therefore request that Longside Lake be removed from Policy VW9. Therefore, we proposed that Longside Lake be removed from Policy VW9 altogether.

Notwithstanding the above, we have reviewed the policy wording, which reads as follows:

Proposals that will harm or result in the loss of these facilities will be resisted unless it can be clearly demonstrated that:

- ‘• All reasonable efforts have been made to market the premises for its existing use and no other potential occupier can be found for a period of a year;
- All reasonable efforts have been made to improve the operation and management of the business or facility;
- The land is no longer a suitable location; and

In the case of the loss of a public house, suitable alternative public houses exist to meet the needs of the local community; or

In the case of the loss of a local community use, suitable alternative uses or premises exist to meet the needs of the local community.

In the case of a proposed change of use, the proposed use will be beneficial to the community, including recreational or leisure use.’

The policy criteria set about are not achievable in practice. For example, as a landowner, we cannot ensure a tenant and business owner makes ‘improvements’ to

the management of the facility – we would be powerless to do. Furthermore, the proposed Policy itself may obstruct business improvement by limiting permissible uses.

Paragraph 048 of the [Neighbourhood Planning Guidance](#) is clear that other public bodies, landowners and the development industry should, as necessary and appropriate be involved in preparing a draft neighbourhood plan or Order. To this day, Tarmac, as the Landowner, have never been approached about the inclusion of their land as a designation within the Neighbourhood Plan. The failure to do this has led to an outcome the guidance warns off - a draft plan that seeks places unrealistic pressures on the cost and deliverability of a 'community use'. From this, legal requirements to engage with landowners have been breached and the inclusion of Longside Lake as a community use could therefore be unlawful. Based on this, we would implore the Parish Council and Neighbourhood Plan Steering Group to remove the community use designation from Longside Lake.

Aspiration VWA2: Heavy Goods Vehicles

Aspiration VAW2 states that 'the Neighbourhood Forum will work with the Highways Authority and the Local Planning Authority to reduce the number of heavy goods vehicles on roads in the village including the restriction of vehicles of over 3.5T.'

This is not in accordance with national policy whatsoever. In the most recent revision to the National Planning Policy Framework (December 2024), the threshold to which applications can be refused on highways grounds was increased.

The NPPF is clear that Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

Runnymede 2030 Local Plan Policy E22 enables planning conditions to require submission and implementation of Construction Environmental and Traffic Management Plans. These include adequate measures to protect the local environment from impacts such as dust, fumes, noise, and construction traffic. Further restriction on specific vehicle types is unnecessary and unjustified.

Therefore, Aspiration VWA2 is contrary to NPPF and must be amended to align with the NPPF.

Conclusion

In conclusion, it is clear that Longside Lake should not be designated as a community facility within Policy VW9. Policy VW9 must be revised to avoid restricting business growth and to reflect realistic operational conditions. We are disappointed that as the landowner, we have not been approached regarding this designation and would consider that the Draft Plan has not had regard to national policy and guidance due to this, thus failing a basic condition of examination and the Plan's legal compliance.

Furthermore, the highways aspirations referenced above are contrary to the NPPF and not in general coherence whatsoever. These policies would limit growth and not represent sustainable development. As such, to proceed with these policies as written would not meet the legal requirements of the Town and Country Planning [1990].

We trust that the points raised in this letter will be duly considered with modifications to be made for the aforementioned policies.

Yours faithfully,

Tarmac Trading Ltd