

# Virginia Water Neighbourhood Plan Examination (October 2025) Forum Response to Examiners Questions

## Examiners Question 1: Re. Policy VW1 (High Quality Design) and Figure 2 (VWNP Design Code Policy Map) (Pages 19 and 24)

*It is my initial assessment that the ‘Virginia Water Design Code’ (May 2025) needs to be appropriately referenced in the draft Plan to a much greater extent than is presently the case. It is clearly a requirement for the successful implementation of Policy VW1 and the interpretation of the coding for the six Character Areas defined on Figure 2. Indeed, at paragraph 6.2, the Design Code is described as a “separate background evidence document”. Its status is much more significant than this, notwithstanding the Design Code itself will not form part of the statutory development plan for the area.*

*My current view is that the full document, which is only 20 pages in length, should be an Appendix to the Plan with appropriate cross-references to it from Policy VW1 and the relevant parts of the supporting text contained in Section 6, for example at paragraphs 6.1 and 6.35.*

*Additionally, I consider that the policy text within Section 6 needs to provide rather more detail on the purpose and content of the Design Code for the promotion of high-quality development and visually appealing urban design within the Plan area, than is presently set out very briefly within paragraphs 6.1, 6.2 and 6.35.*

*Can the **Qualifying Body** please provide me with a Note setting out proposed amendments to Policy VW1 and other parts of the draft Plan that would address the points that I have raised above, which I can consider as potential modifications to the draft Plan.*

*I also suggest that the **Qualifying Body** should take into consideration the Borough Council’s representations regarding the Design Code, contained at pages 2 and 3 of Appendix 1 to the Council’s representations dated 14 October 2025.*

## Neighbourhood Forum Response

It is welcomed that the Examiner considers the Design Code should be an Appendix within the NP document and further references to it inserted and that the Policy text be amended to provide more detail.

The tables below include the proposed amendments from the Forum. Please note that not all suggestions from RBC have been incorporated.

### Proposed amendments:

Neighbourhood Plan Paragraph/Policy	Proposed modifications (in bold)
Appendix 1 (new)	Add Design Code as Appendix 1 within NP document
Para 6.1, second sentence	The Neighbourhood Forum therefore has produced a Design Code ( <b>Appendix 1</b> ) to manage and guide design matters across the Neighbourhood Area
Para 6.2	Delete first sentence
Para 6.17	Delete last sentence
Para 6.35	Final sentence altered to read ‘This policy also complements the adopted Runnymede Design Supplementary Planning Document (SPD).
Policy VW1	Development proposals must be of high quality <b>and reflect the distinctive character of the Neighbourhood Area</b> in terms of design, bulk and massing, materials and landscaping and accord with the provisions of the Virginia Water Design Code ( <b>Appendix 1</b> ) that are relevant to their nature and scale, and to the Design Character Area in which they are located, as defined on the Policy Map (Figure 2). <b>As appropriate to the type, scale and location, new development proposals must:</b>

	<ul style="list-style-type: none"> <li>• <b>Ensure that historic character is respected and development is designed to reflect this;</b></li> <li>• <b>Relate to the existing development pattern in terms of the definition of streets, plot sizes and spaces between buildings;</b></li> <li>• <b>Be of an appropriate scale, height and density in relation to its setting;</b></li> <li>• <b>Use materials and architectural details appropriate to the development's context;</b></li> <li>• <b>Be of a design with a locally inspired or distinctive character;</b></li> <li>• <b>Retain existing trees, hedgerows and green spaces where possible and provide appropriate landscaping, planting and boundary treatment;</b></li> <li>• <b>Not impede the quality of existing important views.</b></li> <li>• <b>Provide parking and/or retain existing parking.</b></li> </ul>
Figure 2: Map of character areas	Letter label areas to make map clearer

For proposed amendments to the Design Code, see RBC's Reg 16 representations. Please note, not all RBC's suggestions have been incorporated as there is an element of disagreement with some of their comments, or some are not considered necessary.

<b>Design Code Paragraph</b>	<b>Proposed modifications (additions in bold)</b>
1.1, first sentence	The Virginia Water Design Code ("the Code") is <del>both a standalone document and a technical background document</del> <b>an Appendix of to Virginia Water Neighbourhood Plan.</b>
1.2	Delete second sentence
1.4	Change 2020 to <b>2030</b>
1.7 additional sentence at end of para	<b>Amendments or updates will be made as part of the Neighbourhood Plan Review process.</b>
2.1 first sentence	Remove 'the village of'
Map of character areas	Letter label areas to make map clearer
Character Area A Text Box Design Objective: Conservation, Character Area E Text box Design Objective: Conservation, Character Area G Text Box Design Objective: Conservation	The location of the Character Area in the designated Green Belt means that new development must <b>accord with national and Local Plan Green Belt policy requirements.</b> <del>preserve the essential openness of the Green Belt.</del>
A2i	Add at end, <b>unless fully justified.</b>
A2ii	Remove 'out'
A4 ii	Proposals must <del>acknowledge</del> <b>identify and take account of</b> the important views along Christchurch Road of the Wheatsheaf Hotel on London Road and the glimpse views of Christ Church. <b>The design of new buildings (or extension) proposals must retain these views wherever possible. The blocking of these views will not be supported.</b>
A5 ii, B6ii C7ii, D6vii, E4ii. F6ii, G6ii	All development, <b>where relevant</b> , should contribute to the delivery <b>of biodiversity improvements under the requirements for Biodiversity Net Gain and contribute to</b> high quality multi-functional networks of Green and Blue Infrastructure (GBI) to

	provide long-term benefits for people, places and nature, in ways that reinforce local character.
A5 iii, B6iii, C7iii, D6ix, E4iii, F6iii, G6iii	Delete
A6 i	The spaces between buildings must be sympathetic and proportionate <b>to the existing street scene.</b>
A7ii	Proposals for a new driveway or to move an established access to a new position, should ensure it does not create a traffic hazard or adversely affect <b>the amenity of</b> neighbouring properties.
A7iii. B8iii,	Proposals for new driveways across verges must be constructed to <b>the Highways Authority requirements.</b> <del>an approved specification</del>
A8i, B9i	Proposals should not <b>significantly adversely</b> affect the privacy of a neighbour's house and garden or significantly <b>adversely</b> affect neighbours outlook.'
A8iv, B9iii	Delete
A9 (ii)	Delete
B1 ii	Proposals must not lead to new buildings or existing buildings <b>significantly</b> extending in front of any building line to the plot frontage that is common to both adjoining buildings'
B5 i-iii	i. <del>The design of p</del> Proposals on land forming the junction of Christchurch Road with Wellington Avenue <del>and must retain acknowledge</del> the special prominence of those locations in the streetscape. ii. Proposals must <del>acknowledge</del> <b>identify and take account of</b> the important views along Christchurch Road of Station Approach. <b>The blocking of these views will not be supported.</b> iii. Proposals must <del>acknowledge</del> <b>take into account</b> the role played by some locations on Christchurch Road in terminating views from its private side roads.
B7i	The spaces between <b>new</b> buildings <del>and new and existing buildings</del> must be proportionate <b>within the street scene</b> and not create an imbalance in the built form and settlement pattern.
B10ii	Delete
5 Heading	Change 'Victoria' to ' <b>Virginia</b> '
C1ii - iii	More maps to be provided
C2	No change, owners have not been consulted.
C4	No change, this code already has some flexibility built in.
C6i	No change, the special character can be seen on site when considering planning applications.
D3ii	Replace with ' New residential development along Trotsworth Avenue shouldrespond to the established character of the Wentworth Estate, which is defined by its rural setting and sense of visual openness. To preserve this character in this originally established development, new dwellings should be designed to ensure that building height, massing and rooflines remain subordinate to the surrounding landscape and do not disrupt the established streetscape.
E2i	Replace 'consider the dominance of' with <b>use</b>
F1i	Proposals at Station Parade should retain the existing uses: blocks of residential flats with partial active frontages at the ground floor <b>(where planning permission is required).</b>
F5	Proposals in the Village Centre should retain the primary commercial and social function of the village <b>(where planning permission is required).</b>
F6i	Proposals for any building or structure on the public open spaces at the War Memorial and gardens in Station Parade and in front of Station Approach will be resisted <b>unless it would enhance the public space.</b>
G1	Proposals should <del>acknowledge</del> <b>reflect</b> the very regular patterns of plot shape, size and orientation along the full length of Stroude Road and Sandhills Lane (including The Drive).

G2i & ii	<p>i. Proposals <b>for new dwellings</b> on Stroude Road may be either of a detached or semi-detached house-built form preferably with hipped or cross hipped roof forms <b>to retain local character</b>.</p> <p>ii. Proposals <b>for new dwellings</b> on Sandhills Lane should be detached <del>houses</del> <b>buildings</b>, other than on its south side east of Virginia Heights to Ferndale, where proposals should be semi-detached or terraced houses with half dormers. <b>This will ensure that the important local character is reinforced.</b></p>
G4i	<p>i. Proposals at Nos. 372, 376, 382, 388 (Merrick Cottage), 409, 413, 443, 449, 461 and 467 Stroude Road should <del>acknowledge and</del> positively respond to their prominent locations in the street scene sitting forward of the main building line to either terminate or punctuate a long view along the road.</p>
G5i	<p>i. Proposals <b>which require planning permission</b> for the change of use of dwellings and/or their curtilages to commercial uses will not generally be supported unless they are of benefit to the community.</p>

# Virginia Water Neighbourhood Plan Examination (October 2025) Forum Response to Examiners Questions

## Examiners Question 2: Policy VW2 – Local Gaps (Page 25)

*As drafted, this Policy raises issues of its consistency with current national planning policy<sup>[1]</sup> and its general conformity with the strategic policies contained in the adopted Runnymede 2030 Local Plan. This raises the further, and more important, consideration of whether the draft Plan satisfies the Basic Conditions. There have been some significant representations at the Regulation 16 consultation stage objecting to this Policy, including some extensive comments made by the Borough Council, who consider, inter alia, that the Policy duplicates national and Local Plan strategic policy requirements.*

*I note, and have studied, the accompanying Local Gap Study, prepared by Briarwood Landscape Architecture in August 2023, which serves as the principal evidence base document for this Policy.*

*I also note that the proposed Local Gap extends across two of the proposed Design Code Character Areas, which in my assessment adds a further layer of policy duplication to those areas.*

*I further note that the adopted Runnymede 2030 Local Plan contains no allocations for proposed development within the area covered by the proposed Local Gap. Similarly, neither the adopted Surrey Minerals Plan Core Strategy (2011) nor the Surrey Waste Local Plan (2020) contain any proposed allocations for minerals or waste developments. However, I understand that there have been two planning applications for large scale mineral extraction within the area in recent years.*

*I confirm that I shall visit the areas covered by the proposed Local Gap during the course of my site visit. I also confirm that I shall give full consideration to the representations that have been made concerning the Policy.*

*From my initial assessment, the key issue that I shall need to address is whether the Policy provides appropriate and justifiable protection to the landscapes that lie within the proposed Local Gap which are not otherwise suitably addressed by their current designations, the draft Policies in this Plan or those within the adopted Local Plan, and in particular that such protection justifies the final part of the Policy text.*

*I invite the Qualifying Body to consider the representations that have been made to this Policy, and to provide me with a Note on any points arising from those representations and my own initial assessment above (i.e. those that it considers pertinent to my full detailed assessment in due course).*

## Neighbourhood Forum Response

Representations on this policy have been made by RBC, Boyer (representing a land holder) and CBRE (unclear who they represent).

At the outset of the Neighbourhood Plan process, the Forum were concerned that the northern extent of the Neighbourhood Area is most vulnerable to development given the proximity to both Virginia Water and Englefield Green and Egham. Development, both large and small scale, could potentially erode the character and landscape of the Area by creating more of a

continuous perception of built development whereas currently there is a clear separation of the built up areas. This is the reason why the evidence base document by Briarwood Landscapes was commissioned. This document considered the study area proposed by the Forum and made recommendations to reduce the area proposed but to designate the current area, taking into account the existing policy restrictions (Green Belt), Local Plan policy. Clear criteria for assessment are set out in that document, including landscape quality.

**Case Study - A 5 Acre Farm, Stroude Road** - An example of landscape being lost through incremental development that has eroded the gap.

Some 6 years ago, Five Acre Farm comprised open pastureland with a simple five-bar wooden gate providing access to Stroude Road. At that time, there were no buildings on the site. The property sits directly opposite Great Fosters Hotel, a Grade I listed building of significant historic value dating back to the reign of Henry VIII.

Following a change of ownership, an application was submitted to Runnymede Borough Council seeking consent for the development of a livery yard and riding arena. This included proposals for a substantially widened entrance with brick gate piers, iron gates, and the enclosure of the land with a 2-metre-high close-boarded timber fence extending approximately 250 metres along the road frontage.



Six years later, the extent of development on the site has far exceeded the original proposals. The land now contains hundreds of square metres of commercial buildings, lorry parking, and at least three permanent residential caravans. The former grassed areas have been replaced entirely by hardcore and shingle surfacing, resulting in the land effectively becoming 'grey belt' and increasingly intensively used.

All of this activity has occurred within designated Green Belt land. By progressing development without prior consent and subsequently submitting retrospective planning applications, the outcome has too often been that the Planning Authority concludes that enforcement would not be a proportionate use of public funds. This approach frequently results in unauthorised development being retained by default.

The Forum observes this pattern occurring at a number of Green Belt locations and notes that it rarely leads to the prevention of continued urbanisation. We hold the strong view that Virginia Water must not be allowed to merge into an extended urban corridor connecting Egham and Longcross. Both Egham and Virginia Water have sufficient capacity within their defined

settlement boundaries to meet local housing requirements without contributing to the coalescence of distinct communities.

### **Principle**

Green Belt policy set out in the NPPF is primarily concerned with the principle of retaining the openness of the Green Belt, not the landscape and character contribution that high quality landscape areas make to the wider Neighbourhood Area.

The policy does not conflict with the existing Local Plan policy and the Forum would have welcomed a higher tier Local Gap policy within the Local Plan, but there is currently no such Local Plan policy.

RBC themselves in their representation say that *‘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.’*

This part of the representation provokes some concern in the context of Policy VW2 where there is such a sensitive gap area which is already experiencing ‘development creep’ in the Green Belt.

Policy VW2 seeks to protect the area that local people consider to be most valued in landscape terms and makes the most important contribution to the character of the Neighbourhood Area through the retention of the gap between built up areas. Local people would not wish to see RBC remove this area from the Green Belt as part of their Local Plan Green Belt Review and designating it as a Local Gap will assist RBC in their Green Belt Review.

Whilst it is acknowledged that the Design Code also identifies Character Areas and sets out guidance for those areas, the weight attached to the Codes/Guidance through planning application assessments will inevitably not be as strong as a Neighbourhood Plan Policy.

An addition to the text to give more clarity to applicants in terms of what evidence is required to be submitted with a planning application in the Local Gap area may be added, as suggested by RBC. This could be a landscape character analysis or Visual Impact Assessment, specifically demonstrating that visual impacts have been addressed and separation preserved (or impacts mitigated to an acceptable level) depending on the size and location of the proposal.

The Forum therefore considers that the Local Gap policy is not in conflict with national or existing Local Plan Policy and respectfully requests that the Policy and designation should be retained within the Neighbourhood Plan.

# Virginia Water Neighbourhood Plan Examination (October 2025) Forum Response to Examiners Questions

## Examiners Question 3: Re. Figure 4 VWNP Active Travel Policy Map (Page 36)

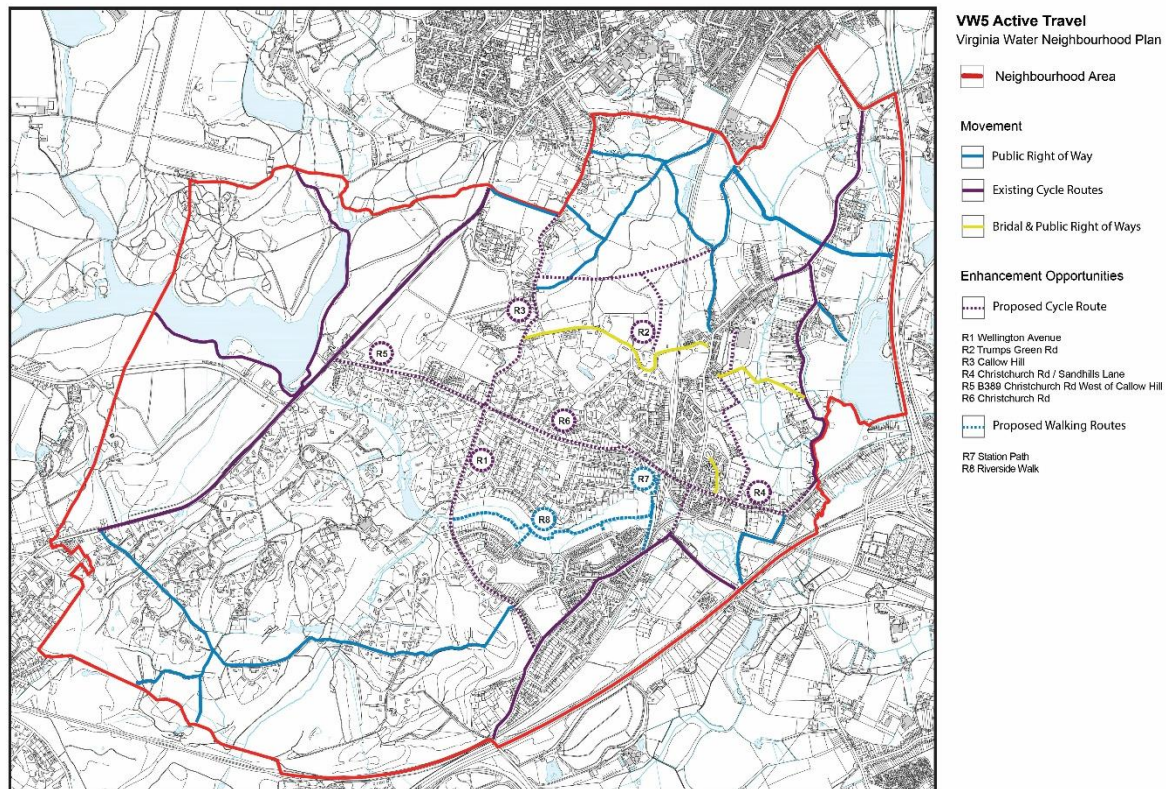
*I would be grateful if the **Qualifying Body** could provide me with a Note addressing the points raised by the Borough Council concerning this Map (at page 7 of Appendix 1 to the Council's representations dated 14 October 2025).*

*I also seek confirmation that "Figure 5" referenced in the text of Policy VW5 should read "Figure 4".*

## Neighbourhood Forum Response

RBC's comments are very helpful and the map has been amended.

It is confirmed that 'Figure 4' is the correct reference.



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## Virginia Water Neighbourhood Plan Examination (October 2025) Forum Response to Examiners Questions

### Examiners Question 4: Re. Policy VW6 – Highways Environment (Page 37)

*As drafted, this Policy does not constitute a land-use planning policy but, instead, is a statement that certain development proposals which secure funding including developer contributions to deliver highways and public realm improvements will be supported.*

*It therefore conveys the implicit assumption that proposals which do not deliver such funded improvements will not be supported. Furthermore, it is possible that some proposals which do include funded highways and public realm improvements may not be acceptable for other valid planning reasons, such as design, density and layout.*

*It is also the case that many development proposals, such as changes of use or minor extensions, will not be required to provide any highways and public realm improvements.*

*The Policy therefore requires substantive revision in order to provide effective policy guidance to users of the Plan on the highways, traffic and public realm considerations that should be taken into account in the design of development proposals in the Plan area.*

*I therefore invite the Qualifying Body to consider the points raised above and provide me with the text of a revised policy that I may consider as a potential modification to the draft Plan.*

### Neighbourhood Forum Response

It is suggested that the following wording could be substituted for the current proposed wording for VW6

**New development proposals, where relevant, should include on site measures and/or off site improvements to the public realm that keep traffic speeds low and do not unacceptably impact residential amenity.**

**Where they are proposed, new roads, junctions, pavements and traffic management measures should be designed to increase access and links for public transport users, pedestrians, cyclists, mobility scooters and horseriders.**

**New development which includes highways improvements to the identified locations on Figure 5 will be supported, subject to the proposals being in accord with other development plan policies.**

# Virginia Water Neighbourhood Plan Examination (October 2025) Forum Response to Examiners Questions

## Examiners Question 5: Re. Re Policy VW7 – Green and Blue Infrastructure Network (Page 39)

*Paragraph 12.3 states that “all new planning proposals, including a change of use where the impact of the new use will exceed that of the existing use, will need to prepare a green and blue infrastructure plan to accompany a planning application”. This statement exceeds the requirements of the Policy itself, and is therefore potentially confusing for users of the Plan. In my assessment, the Policy needs to specify in more detail which categories and scale of development the Policy is intended to apply to, (as it will not apply to many minor development proposals, including householder applications), and that paragraph 12.3 should be suitably amended or deleted.*

*Can the Qualifying Body please provide me with a Note setting out the necessary amendments to the Policy text and to paragraph 12.3 of the supporting policy text, that I may consider as a modification to the draft Plan.*

## Neighbourhood Forum Response

The RBC Supplementary Planning Guidance

<https://www.runnymede.gov.uk/downloads/file/1243/gbi-spd-nov21>

states how GBI improvements can be incorporated into even small scale planning applications. It has sections for householder development and minor and major planning applications to give guidance to developers. It is therefore surprising that RBC's representations should ask for more clarity within the NP. It is suggested that the SPD is signposted more clearly in paragraph 12.3 and Policy VW7 as below.

With regard to the third paragraph, 'necessary' can be replaced with 'appropriate' which gives the flexibility required.

## Proposed changes

Paragraph 12.3.

Accordingly, all new planning proposals, including a change of use where the impact of the new use will exceed that of the existing use, will need **to consider and incorporate GBI in line with RBC's SPD and demonstrate this by providing GBI information and proposals** ~~to prepare a green and blue infrastructure plan to accompany a planning application.~~

Policy VW7: add new sentence at beginning of policy

**Proposals for new development in the Plan area should take account of Runnymede Borough Council's Green and Blue Infrastructure Supplementary Planning Document (SPD).**

Third paragraph: 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~~ **appropriate**.

# Virginia Water Neighbourhood Plan Examination (October 2025) Forum Response to Examiners Questions

## Examiners Question 6: Policy VW8 – Sustainable Building Design (Page 42)

*As drafted, I consider that this Policy does need some redrafting in order to provide a clearer understanding of its requirements for prospective users of the Plan, many of whom will be concerned with preparing planning applications.*

*I consider that the Policy needs to contain an introductory statement that it is setting out a series of requirements to promote sustainable building design in the Plan area. This should then be followed, either by a series of clauses under appropriate sub-headings such as 'Energy performance' and 'Heritage assets' or by a series of bullet point criteria.*

*I also note that Surrey County Council (as Lead Local Flood Authority) has made a representation stating that its previous representation (at the Regulation 14 consultation stage) regarding the requirements for the Plan to include a requirement for Sustainable Drainage Systems (SuDS) has not been addressed by the Qualifying Body. I also consider that this does need to be included in the draft Plan, and my initial assessment is that this could be included as part of Policy VW8, with appropriate supporting text.*

*I therefore invite the Qualifying Body to please provide me with a Note setting out the necessary amendments to the Policy text and its supporting text, that I may consider as a modification to the draft Plan.*

## Neighbourhood Forum Response

The following changes (new or replacement text in red) are proposed.

### **Policy VW8: Promoting Sustainable Building Design**

**The design and standard of any new building should aim to meet a high level of sustainable design and construction. All new buildings (and redevelopments and extensions to buildings where relevant) should aim to:**

- **Achieve high standards of energy performance and carbon reduction through:**
  - **Incorporating high levels of insulation and/or other measures such as the Passivhaus standard to reduce heat loss and increase efficiency,**
  - **Incorporating low-carbon heating systems and smart energy-management systems to optimise operational performance,**
  - **Integrating on-site renewable energy generation where appropriate.**
- **Address in a design statement the embodied carbon of materials and lifecycle emissions, including maintenance, repair, and eventual deconstruction. Where possible, materials should be sourced locally.**

**Alterations to existing buildings should be designed with energy reduction in mind and comply with sustainable design and construction standards.**

**For proposals involving any heritage asset, improvements in energy efficiency of that asset should be consistent with the conservation of the asset's significance (including its setting)**

and be in accordance with national and local policies for conserving and enhancing the historic environment.

Where relevant, new development must incorporate sustainable drainage systems (SuDS) to manage surface water effectively and reduce flood risk, in line with guidance from Surrey County Council as Lead Local Flood Authority.

### Supporting Policy Text

13.1 This policy sets out a series of requirements to ensure that wherever possible, new development within the Neighbourhood Plan area contributes positively to sustainable building design and environmental resilience. The aim is to reduce carbon emissions, improve energy efficiency, and integrate measures that support long-term climate change objectives, while respecting the character and heritage of the area. This policy is intended to encourage the type of step change required in the NPPF in making 'radical reductions' in carbon emissions and requires developers to ensure they address the Government's climate change targets and energy performance at the very initial stages of design. The Runnymede Borough Council toolkit was adopted in March 2024, and information about this can be found here <https://www.runnymede.gov.uk/council-policy-1/net-zero-carbon-toolkit>, promoting fabric-first principles and energy use intensity targets, and performance standards equivalent to that of a Passivhaus home. It will be ~~has been~~ adopted as guidance for developers on how to achieve net zero carbon operational standards beyond that of the Runnymede 2030 Local Plan.

#### 13.2 Sustainable building by design means

- making spatial decisions on layout and orientation of buildings at the outset to maximise the passive design benefits (free heat) of a site and avoids leaving this to technical choices and assessment at the Building Regulations stage by which time the opportunity may have been lost.
- Incorporating a fabric-first approach that prioritises high levels of insulation, airtightness and thermal bridging minimisation, ensuring significant reductions in heat loss before considering technological solutions.
- Utilising high-efficiency building services, including low-carbon heating systems such as air-source or ground-source heat pumps, mechanical ventilation with heat recovery (MVHR), and smart energy-management systems to optimise operational performance.
- Integrating on-site renewable energy generation such as solar photovoltaic panels, solar thermal systems, or other appropriate technologies that demonstrably reduce operational carbon emissions.

13.3 An Energy Statement ~~will be required to~~ **should** be submitted with major planning applications ~~to demonstrate compliance with the policy~~. The statement should include a passive design capacity assessment to demonstrate how opportunities to reduce the energy use intensity (EUI) of buildings over the plan period have been maximised in accordance with the energy hierarchy. ~~Designers shall evaluate the~~

- operational energy use using realistic information on the intended use, occupancy and operation of the building to minimise any performance gap.
- 13.4 The monitoring of energy performance is critical to ensure that planned efficiency is implemented. The policy seeks to tackle a longstanding problem of constructed buildings **may not meet** not meeting the energy performance standard proposed by the builder, which only becomes obvious once the building is occupied. Ideally, the developer of a consented housing development scheme of any size should ensure that they have made provision with future occupants to be able to enter properties after the first year of occupation, or thereabouts, to carry out a Post-Occupancy Evaluation (POE), including actual metered energy use, and to submit a report to the Local Planning Authority. Further guidance on the purpose and operation of this is contained in the Post-Occupancy Evaluation Guidance, published in the evidence base alongside the Neighbourhood Plan.
- 13.5 Without a check and balance in the approval system there is currently no means of correcting these failures that are resulting in higher energy bills for occupants and under-performance on meeting carbon reduction targets. **Whilst this cannot currently be achieved through planning policies**, Sections 8.1-8.2 of the Future Homes and Buildings Standard consultation (FHBS) puts forward options to assess real-world performance of homes (preferably using a Smart Meter Enabled Thermal Efficiency Rating, anticipating that most new homes will be fitted with smart meters). The use of such methods ~~are required~~ **recommended** until they are introduced as part of the FHBS in 2025, at which point they will be monitored through the Building Control regime. This element of the policy provides consistency with future, national plans for monitoring post-occupancy performance.
- ~~5. Ideally, the developer of a consented housing development scheme of any size should ensure that they have made provision with future occupants to be able to enter properties after the first year of occupation, or thereabouts, to carry out a Post-Occupancy Evaluation (POE), including actual metered energy use, and to submit a report to the Local Planning Authority. Further guidance on the purpose and operation of this is contained in the Post-Occupancy Evaluation Guidance, published in the evidence base alongside the Neighbourhood Plan.~~
- 13.6 The policy encourages all new buildings, no matter what their intended use or size, to adopt the 'Passivhaus Planning Package' (PHPP) or equivalent design methodology **is recommended** where it is feasible to do so. It is accepted that there may be some factors that make its use unfeasible, for example, the topography and orientation of the site. Using such a design methodology will also ensure that expensive and unnecessary retrofit costs are not passed down to building occupiers in the future, particularly in an area which has relatively high property values. Until such standards can be required by planning policy or Building Regulations, it is hoped that this approach is generally used especially as the build costs of doing so are now only just above those of conventional buildings.
- 13.7 The policy recognises that occasionally a feasible design solution cannot adhere to all the parameters of the Design Code of its local area, especially given its special historical and architectural interest. It therefore strikes the balance in favour of that solution unless the proposal will cause substantial harm to a Conservation Area or to the setting of a listed building. Planning applications for energy efficiency / net zero measures will need to comply with policies EE3-EE8 of the Runnymede 2030 Local

Plan, which generally seek to conserve and enhance existing heritage assets within the Borough. Even less-than-substantial harm to a Conservation Area or listed building setting will be given considerable weight in decision-making. For any heritage asset, improvements in energy efficiency of that asset should be consistent with the conservation of the asset's significance (including its setting) and be in accordance with national and local policies for conserving and enhancing the historic environment. Historic England's guidance may be useful for applicants: [Energy Efficiency and Retrofit in Historic Buildings | Historic England](#) This provides further guidance on avoiding harm to the historic environment and implementing energy efficiency measures to address the climate emergency. Applicants will be expected to address this matter in the Design & Access Statement.

- 13.8 Runnymede 2030 Local Plan Policy SD8 requires major development proposals to apply the energy hierarchy, as evidenced in an Energy Statement. This means that new development must achieve Part L Building Regulations energy performance standards, but proposals should focus on using less energy in the first instance (and therefore focus on achieving high fabric efficiency standards in Part L before considering the use of on-site renewable energy at stage 3 of the hierarchy). Once energy efficiency is optimised, the policy goes on to state that larger development proposals should then meet a proportion of the development's energy needs from renewables and / or low carbon technologies. The Runnymede 2030 Local Plan policies do not reference embodied carbon, so the Neighbourhood Plan Policy seeks to address this issue. UKGBC's One Click LCA Planetary Tool, can be used as a free tool to assess the impact of key construction materials.

~~9.—Whilst an Energy Statement is required by the Runnymede 2030 Local Plan to accompany major developments~~

- 13.9 **S** Smaller proposals should include consideration of sustainable building and energy efficiency as part of the Design and Access or Planning Statement accompanying planning applications. ~~These Statements could cover:-~~

- ~~• an assessment of the proposal to minimise regulated and unregulated emissions, the embodied emissions and the emissions associated with maintenance, repair and replacement of the new building(s), as well as its dismantling, demolition and eventual material disposal;~~
- ~~• a calculation of the energy and carbon emissions covered by the Future Homes Standard and Building Regulations and, separately, the energy demand and carbon emissions from any other part of the development that are not covered by the Future Homes Standard or Building Regulations;~~
- ~~• the proposal to reduce carbon emissions beyond the Future Homes Standard and Building Regulations through the energy efficient design of the site, buildings and services;~~
- ~~• the proposal to further reduce carbon emissions through the use of zero or low-emission decentralised energy where feasible;~~
- ~~• the proposal to further reduce carbon emissions by maximising opportunities to produce and use renewable energy on-site, utilising storage technologies where appropriate;~~

- ~~the proposal for a demand-side response, specifically through installation of smart meters, minimising peak energy demand and promoting short-term energy storage; and~~
- ~~an analysis of the expected cost to occupants associated with the proposed energy strategy.~~

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- 13.10 Development proposals which could affect drainage on or around the site should incorporate sustainable urban drainage systems (SuDS) which control flow rates and reduce the volume of run off water. These can also provide multifunctional benefits such as increasing biodiversity and in some cases providing benefits for amenity and improving water quality. Surrey County Council are the relevant Lead Flood Authority in Virginia Water.
- 13.11 Every new build or redevelopment project in the Neighbourhood Area provides an opportunity to make a difference and a contribution towards meeting climate change targets for 2050. This policy seeking to include sustainable building design and to include such information to accompany planning applications should not be an onerous financial burden in this Neighbourhood Area given the high relative completed development value to build costs.

## Virginia Water Neighbourhood Plan Examination (October 2025 Forum Response to Examiners Questions

### Examiners Question 7: Re. Policy VW9 – Community Facilities (Page 46)

*A representation has been submitted at the Regulation 16 consultation stage by the owners of Site No. 21 (Longside Lake) stating that it is not a community facility, but is instead a commercial enterprise with access limited to customers to paid leisure activities.*

*It is possible that there are other commercial enterprises listed within Policy VW9, but it is also possible that some other commercial facilities, such as private gyms and private health facilities, are not listed.*

*I wish to ensure that the Policy covers an accurate and consistent definition of those facilities and services within the Plan area that fall within the common understanding of ‘community facilities’, to which the requirements of the policy’s criteria would correctly apply.*

*Can the **Qualifying Body** please identify for me which of the facilities listed in Policy VW9 function as commercial businesses, and which are provided for community use by public bodies, community bodies, churches, charities etc. (I acknowledge that public houses are usually privately-owned).*

### Neighbourhood Forum Response

The Forum acknowledges that some clarity is needed and proposes the following to replace Policy VW9 and the supporting text in the Submission Version Neighbourhood Plan. Some of the outdoor spaces were unfortunately omitted from the policy wording and it is requested that they are included.

## **Policy VW9: Community Facilities**

The following facilities and their curtilages are identified as important to the community, as shown on the Policy Map (Figure 7):

### **Charity-led facilities:**

1. Community Centre and Pre-School
2. Trotsworth Hall – 1<sup>st</sup> Virginia Water Scout Group
3. Royal British Legion
4. Virginia Water Football Club
5. Knowle Hill Tennis Club

### **Public Houses**

6. Rose and Crown Public House
7. Rose and Olive Branch Public House
8. The Wheatsheaf Hotel and Pub

### **Religious facilities**

9. Christ Church
10. Harvestime Church

### **Local Authority Schools**

11. St Ann's Heath Primary School
12. Manor Mead Primary School
13. Trumps Green Infant School

### **Outdoor facilities (owned/maintained by RBC)**

14. Virginia Water Memorial Gardens
15. King George V Playing Fields
16. Cabrera Trust Riverside Walk
17. Coronation Fields
18. Edgell Close Play Area, Stroude
19. Cabrera Avenue Playgroud
20. Stroude Road Allotments

### **Other facilities**

21. Packers Doctors Surgery
22. Library

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

The loss of public houses will be resisted, unless it can be demonstrated that reasonable efforts have been made to secure their continued use for these purposes. If it can be clearly demonstrated that the continued use is no longer viable and evidence is provided that the property has been actively marketed, commensurate with its use at an open market value for a period of at least 12 months, other uses may be supported.

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 provision of new community facilities will be encouraged.

14.1 Virginia Water benefits from a range of facilities that play an important role in supporting the wellbeing and cohesion of the local community. This policy identifies important community facilities across Virginia Water to protect them from harmful development including a change of use. All the facilities serve a primary social purpose, albeit with a commercial basis in some cases, and they continue to serve as a vital social function. Their loss will likely lead to a greater dependence of the local community on services outside the Neighbourhood Area requiring increased traffic movement.

- Services and amenities for education and healthcare include schools (infant & primary), a library, carehomes and a doctors surgery.
- The community centres include the Virginia Water Community Centre and Trotsworth Hall (1<sup>st</sup> Virginia Water Scout Group).
- There are places of worship and commemoration including Christ Church, Harvestime Church and the Virginia Water Memorial Gardens.
- Sports facilities include the Virginia Water Football Club including a club house and Knowle Hill Tennis Club.
- Wentworth Golf Club, Longside Lake and Core Judo facilities are privately owned but not community facilities, they are commercial enterprises with access limited to customers for paid leisure activities.
- Engagement within the community and during our open sessions, confirmed that people place a high value on the open spaces in and around the village that contribute both to recreation and to the character of the area. These include King George V Playing Fields, Cabrera Trust Riverside Walk, Coronation Fields, Edgell Close Play Area, Stroude, Cabrera Avenue Playground and Stroude Road Allotments.
- There are 3 pubs in the area, these are the Rose and Crown, the Rose and Olive Branch and the Wheatsheaf. There is no planning policy in the Local Plan to retain pubs, although they are an important part of community life.

14.2 It is accepted that not every facility that operates as a commercial concern or as a local public service may remain viable in the long term. Accordingly, change of use, conversion or demolition of any of the facilities listed to a use which is not for the community will be resisted unless a replacement would prove more suitable for the needs of the community. The applicant will need to put forward evidence that the existing use is no longer commercially viable and prove that a genuine attempt has been made to market the enterprise as a going concern for at least a year. This reflects the fact that once the premises and land have been lost to this use, then it is very unlikely such facilities will be re-provided elsewhere in the village.

14.3 A description and photograph of each community facility is published in the evidence base [Community Infrastructure - VIRGINIA WATER NEIGHBOURHOOD PLAN](#) alongside the Neighbourhood Plan.

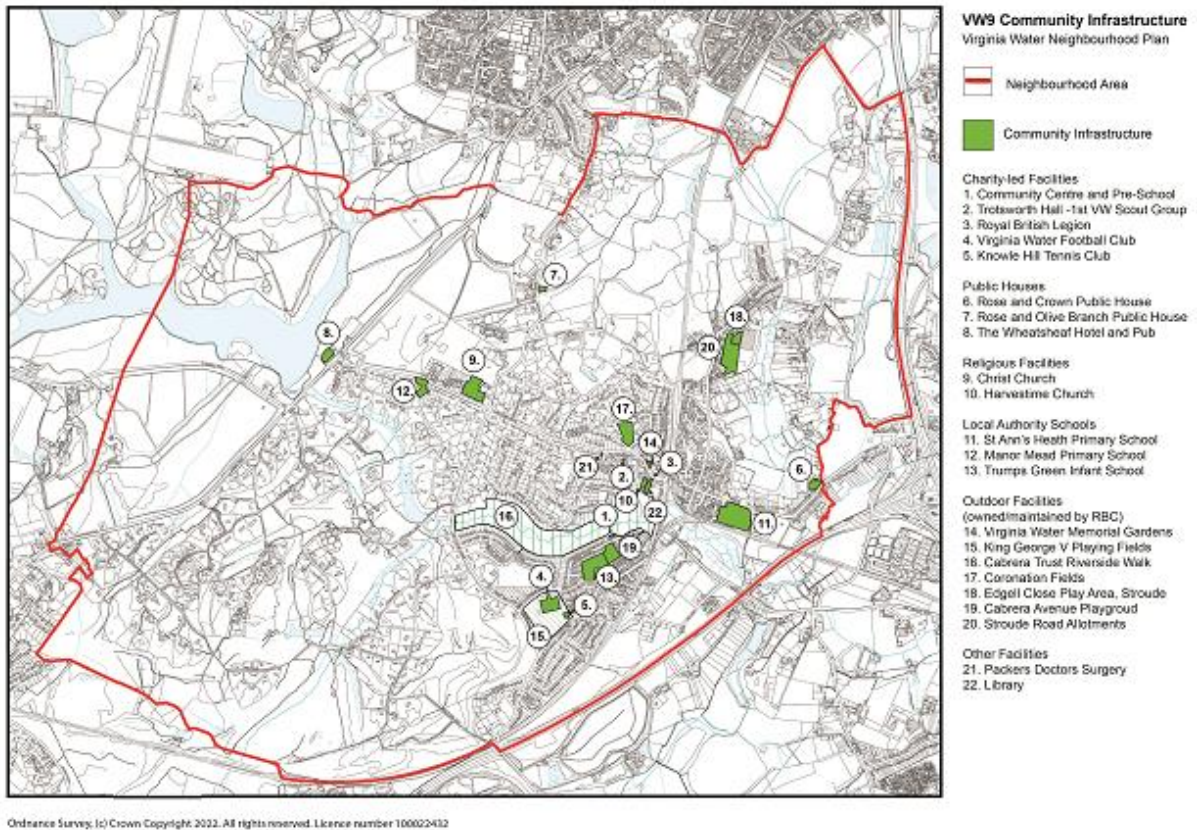


Figure 7: VW9 Community Infrastructure Policy Map