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Report on the Virginia Water Neighbourhood Development Plan 2024-2035

An Examination undertaken for Runnymede Borough Council with the support of the Virginia Water Neighbourhood Forum on the June 2025 submission version of the Plan.

Independent Examiner: Derek Stebbing BA (Hons) DipEP MRTPI

Date of Report: 12 February 2026

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Main Findings - Executive Summary

From my examination of the Virginia Water Neighbourhood Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a Qualifying Body – the Virginia Water Neighbourhood Forum (the Forum);
- the Plan has been prepared for an area properly designated – the Virginia Water Neighbourhood Area;
- the Plan specifies the period to which it is to take effect – from 2024 to 2035; and,
- the policies relate to the development and use of land for a designated Neighbourhood Plan area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

The Virginia Water Neighbourhood Plan 2024-2035

- 1.1 The designated Virginia Water Neighbourhood Area includes the villages of Virginia Water and Trumps Green together with the hamlets of Stroude and Thorpe Green. At its eastern edge, the Neighbourhood Area is demarcated by the M25 motorway whilst to the west it is bounded by the royal parkland of Windsor Great Park and Virginia Water Lake which is a registered Historic Park and Garden. Towards the north, land within the Crown Estate forms a buffer to the village of Englefield Green and the estate of Royal Holloway College, whilst Chobham Common, which is the largest National Nature Reserve in the south-east of England, lies to the south
- 1.2 The population of the Neighbourhood Area at the 2021 Census was 6,334 persons. 60.5% of residents are aged between 16 and 64 years. 55.7% of residents are in full-time employment, of whom 56.8% work from home either partly or fully. Only 15% of the working population commute further than 10 kilometres from the Neighbourhood Area.
- 1.3 The name Virginia Water was first given to the lake at the southern end of Windsor Great Park in the mid-18th century. The creation of the lake and

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its surrounding landscape has played a key role in shaping the development of the Virginia Water neighbourhood as it exists today. The neighbourhood contains many buildings of historic interest. The former Holloway Sanatorium was built in the 1880s. The Sanatorium was a private mental asylum, which was taken over by the National Health Service in 1948. It closed in 1980, and the building and its grounds have since been developed for over 200 new homes and apartments and is now a gated estate known as Virginia Park. Great Fosters Hotel, a former hunting lodge, is a Grade I listed building set in gardens and parkland, which are a Grade II registered Historic Park and Garden.

- 1.4 The Wentworth Estate, famous for its golf course, was first established by the building of a small country estate in the early 19th century. In 1805, the main house on the estate was constructed, and this is now the Wentworth Golf Clubhouse. The Wentworth Estate was the first estate in the country to be protected by an Act of Parliament in 1964 and is confined by freehold covenants, which generally limit plots within the Estate to single dwellings. The two main golf courses, the East Course and the **West Course were constructed during the 1920's, with the West Course** being used for many major tournaments.
- 1.5 The village centre of Virginia Water, focused on Station Parade and Station Approach, is the principal local retail and service hub for the neighbourhood, with a range of retail outlets and amenities. The village centre is designated as a Local Centre in the adopted Runnymede 2030 Local Plan. Thorpe Green has a smaller shopping centre which is confined to a local Shopping Parade. The area is well served by social, community, religious and educational facilities, the most important of which are listed in the draft Plan (at page 46).
- 1.6 Virginia Water Railway Station provides rail services to London (Waterloo), Bracknell, Wokingham, Reading and Weybridge, and is the principal public transport facility in the neighbourhood. Local bus services link the villages and hamlets in the neighbourhood with Staines, Sunningdale, Camberley and Frimley Park.
- 1.7 The Windsor Forest and Great Park Special Area of Conservation (SAC) is partly within the Neighbourhood Area and the Thames Basin Heaths Special Protection Area (SPA), the South West London Waterbodies SPA and the Thurley, Ash, Pirbright and Chobham SAC are all in areas close to the Neighbourhood Area. Windsor Forest and Great Park is also a Site of Special Scientific Interest (SSSI), whilst there are a number of sites of Nature Conservation importance across the Plan area, including six at the Wentworth Golf Courses.

The Independent Examiner

- 1.8 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Plan by Runnymede Borough Council

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(the Council/Borough Council), with the agreement of the Virginia Water Neighbourhood Forum (the Forum).

- 1.9 I am a chartered town planner, with over 50 years of experience in planning. I have worked in both the public and private sectors and have experience of examining both Local Plans and Neighbourhood Plans. I have also served on a Government working group considering measures to improve the Local Plan system and undertaken peer reviews on behalf of the Planning Advisory Service. I therefore have the appropriate qualifications and experience to carry out this independent examination.
- 1.10 I am independent of the Qualifying Body and the Local Authority and do not have an interest in any of the land that may be affected by the Plan.

The Scope of the Examination

- 1.11 As the independent examiner, I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.12 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) (**'the 1990 Act'**). The examiner must consider:
- Whether the plan meets the Basic Conditions.
 - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) (**'the 2004 Act'**). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - **it does not include provisions and policies for 'excluded development';** and

- it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) (**'the 2012 Regulations'**).

1.13 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.14 **The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act.** In order to meet the Basic Conditions, the Neighbourhood Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with and not breach European Union (EU) obligations (under retained EU law)¹; and
- meet prescribed conditions and comply with prescribed matters.

1.15 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a Neighbourhood Plan. This requires that the making of the Neighbourhood Plan does not breach the requirements of Chapter 8 of **Part 6 of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations')**.²

¹ The existing body of environmental regulation is retained in UK law.

² This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

2. Approach to the Examination

Planning Policy Context

- 2.1 At the date of this examination, the adopted Development Plan for this part of the Borough of Runnymede, not including documents relating to excluded minerals and waste development, is the Runnymede 2030 Local Plan (adopted July 2020) **and the 'made' Neighbourhood Plans for Thorpe and Englefield Green Village.**
- 2.2 The Plan area is also covered by the Surrey Waste Local Plan (adopted December 2020); the Surrey Minerals Plan Core Strategy (adopted July 2011); the Surrey Primary Aggregates Development Plan Document (adopted July 2011); and the Surrey Aggregates Recycling Joint Development Plan Document (adopted February 2013), which were all prepared by Surrey County Council. The County Council is preparing a new Minerals and Waste Local Plan to cover the period up to 2042. A Regulation 18 Issues and Options consultation was undertaken between November 2021 and March 2022, and a Regulation 18 Preferred Options consultation is scheduled to be undertaken in June 2027. The Regulation 19 Pre-submission consultation is scheduled for mid-2028 with submission to the Secretary of State scheduled for late-2028.
- 2.3 The Borough Council is at the initial stages of undertaking a review of the Runnymede 2030 Local Plan. As the eighth of my preliminary questions (see paragraph 2.9 below), **I sought the Borough Council's confirmation** that the decision taken by its Planning Committee on 24 September 2025 that the commencement of the Runnymede 2030 Local Plan Review will await the introduction of the new plan-making system reflects the current position with regard to that Local Plan Review. The Borough Council, in its response dated 30 October 2025, confirmed that the commencement of the Review will await the introduction of the new plan-making system.³ Furthermore, the Borough Council stated that it had been waiting for **details of the Government's preferred model for Local Government** Reorganisation (LGR) in Surrey, before deciding how to progress plan-making in Runnymede. Following the announcement on 28 October 2025 **of the Government's preferred approach, the Borough Council will hold** discussions with other authorities in the proposed West Surrey unitary authority regarding the future of plan-making in West Surrey, including Runnymede.
- 2.4 Taking account of the advice in the Planning Practice Guidance (PPG) with regard to an emerging Local Plan⁴, the review of the Runnymede 2030 Local Plan is not at an advanced stage of preparation and therefore I have not considered any implications for this Neighbourhood Plan arising from that review in my main assessment.

³ The intention is to progress the Local Plan Review under the new plan making system (see Schedule 7 to the Levelling-up and Regeneration Act 2023).

⁴ PPG Reference ID: 41-009-20190509.

- 2.5 The Basic Conditions Statement (at Pages 8 and 9) provides an assessment of how each of the policies proposed in the Plan are in general conformity with the relevant strategic policies in the adopted Runnymede 2030 Local Plan.
- 2.6 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The PPG offers guidance on how this policy should be implemented. As the draft Plan was submitted for examination on 4 August 2025, all references in this report are to the December 2024 NPPF and its accompanying PPG.⁵

Submitted Documents

- 2.7 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- The submission version of the Virginia Water Neighbourhood Plan 2024-2035 (June 2025);
 - the Basic Conditions Statement (July 2025);
 - the Consultation Statement 2025 and Appendices A-D;
 - the Strategic Environmental Assessment (SEA) Screening Statement and Determination (July 2025);
 - the Habitats Regulations Assessment (HRA) Screening Statement and Determination (July 2025); and
 - all the representations that have been made in accordance with the Regulation 16 consultation.⁶
- 2.8 I have also considered the supporting evidence documents that have informed the preparation of the Plan, including the following:
- Local Gap Study (Briarwood Landscape Architecture) (August 2023);
 - Virginia Water Design Code (May 2025);
 - Virginia Water Local Centre and Wider Connections Study (PJA) (December 2021);
 - Virginia Water Cycling and Walking Infrastructure Proposal (PJA) (December 2021);
 - Post-Occupancy Evaluation Guidance (Undated);
 - Virginia Water Transport Strategy (PJA) (October 2022); and
 - Virginia Water Community Infrastructure (Undated).⁷

⁵ A revised NPPF was published on 12 December 2024 which includes transitional arrangements for Neighbourhood Plans. Paragraph 239 of the December 2024 NPPF advises that it will apply to Neighbourhood Plans have been submitted (under Regulation 15) after 12 March 2025.

⁶ View at: <https://www.runnymede.gov.uk/planning-policy/neighbourhood-planning/3>

⁷ View at: <https://virginiawaterplan.org/index.html>

Examiner Questions

2.9 Following my appointment as the independent examiner and my initial review of the draft Plan, its supporting documents and representations made at the Regulation 16 stage, I wrote to the Borough Council and the Forum on 20 October 2025⁸ seeking further clarification and information on eight matters contained in the submission Plan, as follows:

- Firstly, with regard to Policy VW1 (High Quality Design) and Figure 2 (VWNP Design Code Policy Map), it was 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. I noted that 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". I considered that 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 view was 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. Furthermore, I considered 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. I therefore invited the Qualifying Body to 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 had, which I could consider as potential modifications to the draft Plan. I also suggested that the Qualifying Body should take into consideration the Borough Council's representations regarding the Design Code, which are contained at pages 2 and 3 of Appendix 1 to the Council's representations dated 14 October 2025.
- Secondly, with regard to Policy VW2 (Local Gaps), I noted that, as drafted, this Policy raises issues of its consistency with current national planning policy 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 had been some significant representations at the Regulation 16 consultation stage objecting to this Policy, including some extensive comments made by the Borough Council, who considered, inter alia, that the Policy duplicates national and Local Plan strategic policy requirements.⁹ I had noted and studied, the accompanying

⁸ View at: <https://www.runnymede.gov.uk/planning-policy/neighbourhood-planning/3>

⁹ See NPPF, Paragraph 16 f).

Local Gap Study, prepared by Briarwood Landscape Architecture in August 2023, which serves as the principal evidence base document for this Policy. I also noted 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 noted 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 understood that there had been two planning applications for large scale mineral extraction within the area in recent years. I confirmed that I would visit the areas covered by the proposed Local Gap during the course of my site visit. I also confirmed 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 would 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 therefore invited the Qualifying Body to consider the representations that had been made to this Policy, and to provide me with a note on any points arising from those representations and my own initial assessment (i.e. those that it considers pertinent to my full detailed assessment in due course).

- Thirdly, with regard to Figure 4 (VWNP Active Travel Policy Map) in the draft Plan, I requested that the Qualifying Body provide me with a note addressing the points that had been raised by the Borough Council concerning this map and confirmation that "Figure 5" referenced in the text of Policy VW5 should read "Figure 4".
- Fourthly, with regard to Policy VW6 (Highways Environment) in the draft Plan, I considered that, as drafted, this Policy does not constitute a land-use planning policy¹⁰ 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. I noted that 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

¹⁰ See section 38A(2) of the 2004 Act.

and public realm improvements. I considered that 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. Accordingly, I therefore invited the Qualifying Body to consider the points that I had raised and provide me with the text of a revised Policy that I may consider as a potential modification to the draft Plan.

- Fifthly, with regard to Policy VW7 (Green and Blue Infrastructure Network) in the draft Plan, I noted that 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. I therefore invited the Qualifying Body to 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.
- Sixthly, with regard to Policy VW8 (Sustainable Building Design) in the draft Plan, I considered that, as drafted, 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. In particular, I considered 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 had also noted that Surrey County Council (as Lead Local Flood Authority) had 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) had not been addressed by the Qualifying Body. I also considered that this requirement does need to be included in the draft Plan, and my initial assessment was that this could be included as part of Policy VW8, with appropriate supporting text. I therefore invited the Qualifying Body to 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.

- Seventhly, with regard to Policy VW9 (Community Facilities) in the draft Plan, I noted that a representation had been submitted at the Regulation 16 consultation stage by the owners of Site No. 21 (Longfield Lake) stating that it is not a community facility but is instead a commercial enterprise with access limited to customers for paid leisure activities. I observed that 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 wished 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. Accordingly, I requested that the Qualifying Body identify 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 acknowledged that public houses are usually privately-owned).
- Finally, with regard to the Runnymede 2030 Local Plan Review, I **sought the Council's confirmation** that the decision taken by its Planning Committee on 24 September 2025 that the commencement of the Runnymede 2030 Local Plan Review will await the introduction of the new plan-making system, and that the timetable set out for the Review at Annex 1 (page 12) to the Borough Council's Local Development Scheme (2024-2028) (October 2024) would be amended appropriately.

2.10 In response to my letter of 20 October 2025, the Borough Council and the Qualifying Body provided me with responses to the questions on 30 October 2025¹¹ and 27 November 2025¹² respectively. I have taken account of the additional information contained in these responses as part of my full assessment of the draft Plan, alongside the documents listed at paragraphs 2.7 and 2.8 above.

Site Visit

2.11 I made an unaccompanied site visit to the Neighbourhood Plan Area on 15 November 2025 to familiarise myself with it and visit relevant sites and areas referenced in the Plan, evidential documents and representations.

Written Representations with or without Public Hearing

2.12 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections and comments regarding the Plan and presented arguments for and against the **Plan's suitability to**

¹¹ View at <https://www.runnymede.gov.uk/planning-policy/neighbourhood-planning/3>

¹² NOT AVAILABLE TO VIEW at 4.1.26

proceed to a referendum. I am satisfied that the material supplied is sufficiently comprehensive for me to be able to deal with the matters raised under the written representations procedure, and that there was not a requirement to convene a public hearing as part of this examination. In all cases the information provided has enabled me to reach a conclusion on the matters concerned.

Modifications

2.13 Where necessary, I have recommended modifications to the Plan (PMs) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications in full in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

3.1 The draft Plan has been prepared and submitted for examination by the Virginia Water Neighbourhood Forum. The decision to undertake the preparation of the Neighbourhood Plan was taken in September 2018, which was followed by applications for the designation of both the Forum and the Virginia Water Neighbourhood Area made to the Borough Council on 12 December 2018. Following public consultation, the applications were approved, and the Neighbourhood Forum and Area were formally designated by the Council on 27 March 2019. The Forum was redesignated, with the appropriate statutory consultation, for a further period of five years on 5 August 2024.¹³

3.2 The objectives of the Forum, as set out in its constitution, are to:

- To improve the area known as Virginia Water (the Neighbourhood Area) for the benefit of individuals living and working within the Neighbourhood Area and local business organisations.
- To promote the social, economic and environmental well-being of the Neighbourhood Area.
- To prepare in cooperation with the Local Planning Authority, a Neighbourhood Plan for the Neighbourhood Area.
- To encourage the goodwill and involvement of the wider community.
- To foster community spirit and encourage civic pride.

The membership of the Forum comprises a minimum of 21 members at all times, and membership is open to:

- Individuals who live in the Neighbourhood Area.
- Local businesses and individuals who carry out business or work in the Neighbourhood Area.

¹³ See section 61F(8) of the 1990 Act.

- Local representatives, including Resident Association groups and elected members of Runnymede Borough Council and Surrey County Council representing all or part of the Neighbourhood Area who have an interest in positively and constructively assisting the Forum to achieve its aims and are willing to adhere to the rules of the Forum.
 - The Forum will aim for as wide a representation of communities in the Neighbourhood Area as possible.
- 3.3 The submission Plan contains a map (Figure 1) of the designated area at Page 8. The Virginia Water Neighbourhood Plan is the only Neighbourhood Plan in the designated area.
- 3.4 The Neighbourhood Forum is the designated body for the preparation of the Plan. The preparation of the Plan has been co-ordinated initially by a Steering Committee and, latterly, by an Executive Committee.

Plan Period

- 3.5 The draft Plan specifies on its front cover (page 1) the period to which it is to take effect, which is from 2024 to 2035. The Plan period extends beyond the plan period of the adopted Runnymede 2030 Local Plan and, accordingly, the Neighbourhood Plan contains an appropriate section addressing 'Monitoring and Review' on page 53 (see paragraph 4.60 below).

Neighbourhood Plan Preparation and Consultation

- 3.6 The Consultation Statement and its four Appendices sets out a full record **of the Plan's preparation and its associated engagement and consultation activity.**
- 3.7 The preparation of the draft Plan has involved five key stages. Stage 1 was the initial consultative and engagement work within the Virginia Water community and the formal establishment of the Forum. This extended between December 2018 and mid-2021, although this work was hampered by the Covid pandemic which placed restrictions on the amount of consultative work that could be undertaken.
- 3.8 Stage 2 extended from mid-2021 to mid-2023 and involved the preparation of key evidence base studies and reports by consultants (see paragraph 2.8 above) and further survey work within the Neighbourhood Area. A series of meetings with local stakeholders, such as the Wentworth Residents Association and local businesses, together with attendance at local events, such as the Virginia Water Village Fete, took place during this period.
- 3.9 Stage 3, which extended through 2023, focused on the preparation of the draft Plan for Regulation 14 consultation. A copy of the draft Plan was sent to the Borough Council in March 2023 for Strategic Environmental

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Assessment (SEA) and Habitats Regulations Assessment (HRA), and a draft Screening Report was issued in July 2023, whilst noting that it was based on **the broad understanding of the Plan's scope as opposed to the detailed draft content of the Plan**. At this time, the proposed Plan period was from 2022 to 2030, and it has subsequently been amended to be from 2024 to 2035 (I note the Regulation 14 draft Plan was also for a Plan period of 2023-2030). The final SEA and HRA Screening Statement and Determination, which was issued by the Council in July 2025, is based upon the updated Plan period of 2024-2035.

- 3.10 Stage 4 was focused on the Regulation 14 consultation. The draft Plan was then published for Regulation 14 Pre-submission public consultation for a period of 13 weeks from 18 December 2023 to 22 March 2024. The consultation was accompanied by extensive local publicity, the distribution of leaflets to households in the Neighbourhood Area, face-to-face engagement at a series of events, meetings, exhibitions and presentations and specific consultations to statutory consultees, key stakeholders and organisations with interests in Virginia Water. The consultation responses that were received are fully recorded at Appendices A-D of the Consultation Statement.
- 3.11 Stage 5 commenced following the Regulation 14 Pre-submission consultation and involved amendments to the draft Plan, where considered appropriate, to take account of the 23 submissions received during the consultation, which included extensive comments made by the Borough Council and Surrey County Council. This stage concluded with the formal submission of the draft Plan to the Borough Council for Regulation 16 statutory consultation (and subsequent examination) on 4 August 2025.
- 3.12 The Consultation Statement provides a comprehensive record of the community engagement and consultation that was undertaken during the preparation of the Plan, including summaries of the issues that were identified at various stages during the engagement process.
- 3.13 Regulation 16 consultation was then held for a period of six weeks from 1 September to 14 October 2025. I have taken account of the 13 responses that were received during that consultation, as well as the Consultation Statement. I am satisfied that a transparent, fair and inclusive consultation process has been followed for the Plan, that has had regard to advice in the PPG on plan preparation and engagement and is procedurally compliant in accordance with the legal requirements.

Development and Use of Land

- 3.14 Subject to Policy VW6 (see paragraphs 4.43 -4.45 below and PM6), I am satisfied that the draft Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.15 From my review of the documents before me, the draft Plan does not include policies or proposals that relate to any of the categories of excluded development.¹⁴

Human Rights

- 3.16 Neither the Borough Council nor any other party has raised any issues concerning a breach of, or incompatibility with Convention rights (within the meaning of the Human Rights Act 1998). From my assessment of the Plan, its accompanying supporting documents, including the Equalities Impact Assessment, and the consultation responses made to the Plan at the Regulations 14 and 16 stages, I am satisfied that the Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. I consider that none of the objectives and policies in the Plan will have a negative impact on groups with protected characteristics. Many will have a positive impact.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The Borough Council issued a draft Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report in July 2023 in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations'). Following the Regulation 14 consultation, the Borough Council undertook a further SEA and HRA screening assessment in May 2025 to take account of a number of changes to the draft Plan. The revised and updated SEA and HRA Screening Statement and Determination was published in July 2025, and this Screening Statement and Determination accompanied the Regulation 16 consultation. The Screening Statement (at Sections 6 and 8), states that the screening assessment has identified that the draft Plan is unlikely to give rise to significant environmental effects and thus does not require a SEA. The results of the Assessment were the subject of consultation with the Environment Agency, Natural England and Historic England. Natural England and Historic England did not raise any concerns such that an SEA would be required for the Plan. Their full responses are included within the Screening Opinion report. The Environment Agency did not respond to the consultation prior to the issue of the draft Screening Report. The Borough Council issued a Screening Determination Notice under Regulation 11 of the Environmental Assessment of Plans and Programmes Regulations 2004 on 14 July 2025.

¹⁴ The meaning of 'excluded development' is set out in s.61K of the 1990 Act.
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- 4.2 I have considered the SEA methodology by which the Plan was duly screened to determine whether the Plan is likely to have significant environmental effects. I am satisfied that a proportionate approach has been taken and that the Plan was screened to take full account of any potential environmental effects upon interests of importance in the Plan area.
- 4.3 As noted above, the Plan has also been screened in order to establish whether the Plan required a Habitats Regulations Assessment (HRA) Appropriate Assessment in accordance with the Habitats Regulations. In its response to the statutory consultation dated 23 June 2023, Natural England stated that it agrees with the conclusions of the screening assessment and that the draft Plan would not be likely to result in a significant effect on any European Site, either or in combination, and therefore no further assessment would be required. Accordingly, the Screening Statement states (at paragraph 8.5) that the Council determines that the draft Plan will not give rise to significant effects on National Network sites either alone or in combination with other plans and/or projects, and that a full Appropriate Assessment is not required.
- 4.4 Therefore, I consider that on the basis of the information provided and my independent consideration of the SEA and HRA Screening Statement and Determination and the Plan itself, I am satisfied that the Plan is compatible with EU obligations under retained EU law.

Main Assessment

- 4.5 The NPPF states (at paragraph 30) **that** “*Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the **statutory development plan**” and also that “**Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies**”. The NPPF (at paragraph 11) also sets out the presumption in favour of sustainable development. It goes on to state (at paragraph 13) that Neighbourhood Plans should support the delivery of strategic policies contained in Local Plans; and should shape and direct development that is outside of these strategic policies.*
- 4.6 Having considered above whether the Plan complies with various legal and procedural requirements, it is now necessary to deal with the question of whether it complies with the remaining Basic Conditions (see paragraph 1.14 of this report), particularly the regard it pays to national policy and guidance, the contribution it makes to sustainable development and whether it is in general conformity with strategic Development Plan policies.
- 4.7 I test the Plan against the Basic Conditions by considering specific issues **of compliance of the Plan’s** nine policies, which address the following

topics: 'The Virginia Water Design Code'; 'Local Gaps'; 'Virginia Water Village Centre'; 'Trumps Green Shopping Parade'; 'Active Travel'; 'Highways Environment'; 'Green & Blue Infrastructure Network'; 'Sustainable Building Design'; and, 'Community Infrastructure'. As part of that assessment, I consider whether the policies in the Plan are sufficiently clear and unambiguous, having regard to advice in the PPG. A policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.¹⁵ I recommend some modifications as a result.

Synopsis

- 4.8 The Plan is addressing a period up to 2035 and seeks to ensure that the **Plan reflects the community's** hopes and aspirations for and about Virginia Water. It seeks to strengthen the community bond between residents and those who work in Virginia Water. It further seeks to enrich local life with accessible local spaces, shops, restaurants and amenities, creating a place that supports community engagement and social connection. By 2035, the Plan aims to have guided sustainable development while preserving **the village's character**, fostered a stronger local community, protected and **enhanced the area's natural and historic features and increased** opportunities for sustainable travel.
- 4.9 Section 1 of the Plan provides an introduction to the Plan following the designation of the Neighbourhood Area by the Council in March 2019 and the establishment of the Virginia Water Neighbourhood Forum. This section sets out the broad legislative framework and requirements for the for the preparation of Neighbourhood Plans, noting that the Plan must be in general conformity with the strategic policies of the Runnymede 2030 Local Plan and contribute to the achievement of sustainable development.
- 4.10 Section 2 of the Plan, **entitled 'Virginia Water Neighbourhood Plan'** provides a brief description of the Plan area, which includes Virginia Water village and Trumps Green village together with the hamlets of Stroude to the north-east and Thorpe Green to the east. Figure 1 on Page 8 of the draft Plan shows the extent of the designated Neighbourhood Area.
- 4.11 This section also contains a summary of the engagement and consultation activity that was undertaken during the preparation of the Plan and the key issues that were identified by residents during that community engagement.
- 4.12 Section 3 of the Plan, **entitled 'Virginia Water Description'** provides a brief history of the development and growth of Virginia Water together with key **demographic statistics and a description of the area's natural** environment, its wildlife and waterways.

¹⁵ PPG Reference ID: 41-041-20140306.

4.13 **Section 4 of the Plan, entitled 'Vision & Objectives', contains the Plan's** vision and its eight objectives.

4.14 The vision, which has been informed and developed through consultation **and establishes the community's** aspirations for the future of the area, is as follows:

"Our Neighbourhood Plan aims to strengthen the community bond between Virginia Water residents and those who work here, ensuring a vibrant, high-quality environment that meets everyone's needs. We want to enrich local life with accessible natural spaces, shops, restaurants, and amenities, creating a place that truly supports community engagement and social connection.

We envision a public realm designed to serve the functional and social needs of the Village in a distinctive, safe, and memorable way. This approach will enhance the unique character of Virginia Water, emphasising its historic buildings and celebrated sports venues. Our plan also prioritises accessibility throughout the Village, with a commitment to sustainability and carbon neutrality. By keeping Virginia Water compact and intimate, we aim to promote a walkable, family-friendly environment.

Key goals include adopting safe and improved connectivity, enhancing green spaces and infrastructure, and supporting family-oriented housing. New developments should add value to our public spaces, through both their design and by contributing to specific community projects through the Community Infrastructure Levy (CIL).

By 2035, we aim for the Virginia Water Neighbourhood Plan to have:

- *Guided sustainable development while preserving the Village's character*
- *Fostered a stronger local community*
- *Protected and enhanced the area's historic and natural features, and*
- *Significantly increased opportunities for non-motorised methods of travel and increased highway safety."*

4.15 **The Plan's** objectives are as follows:

1. Promoting development that respects the environment and supports the local economy
2. Emphasising high-quality sustainable design that reflects local character and creates a sense of place
3. Defining a clear, organised urban edge
4. Encouraging sustainable, attractive, and safe community spaces
5. Reducing the impact of traffic for all highway users including pedestrians and cyclists
6. Improving pedestrian and cycle connections within the

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- neighbourhood and to nearby areas
 - 7. Retaining and improving the natural environment for local people and visitors
 - 8. Supporting local employment, community facilities and schools
- 4.16 Section 5, entitled '**Neighbourhood Plan Policies**', provides a short introduction to the Plan's Policies, and notes that where a Policy applies to a specific site or area, this is shown on the accompanying Policies Map.

Specific Issues of Compliance

- 4.17 I turn now to consider the proposed policies in the draft Plan, and I take into account, where appropriate, the representations that have been made concerning those policies, together with the responses by the Qualifying Body and the Borough Council to my questions (see paragraphs 2.9 and 2.10 above). Sections 6-14 of the Plan set out the proposed nine policies for the Plan area together with their supporting Policy text and, where required, the accompanying maps.
- 4.18 The Basic Conditions Statement (at Section 4 and at Table 1) describes how the Plan, and its policies, has regard to national policies contained in the NPPF and (at Table 2) contributes to the achievement of sustainable development. Table 3 sets out how each of the Plan's nine policies are in general conformity with the strategic policies in the adopted Runnymede 2030 Local Plan (2020).
- 4.19 I consider that overall, subject to the detailed modifications which I recommend to specific policies below, that individually and collectively the **Plan's policies will contribute to the achievement of sustainable patterns of development**. There are a number of detailed matters which require amendment to ensure that the policies have the necessary regard to national policy and to the strategic policies of the Borough Council. Accordingly, I recommend modifications in this report in order to address those matters.

The Virginia Water Design Code

- 4.20 Section 6 addresses the Virginia Water Design Code and contains one Policy (Policy VW1).
- 4.21 Policy VW1 (High Quality Design) states that development proposals must be of high quality in terms of design, bulk and massing, materials and landscaping and accord with the provisions of the Virginia Water Design Code that are relevant to their nature and scale, and to the Design Character Area in which they are located, as defined on the accompanying Policy Map (Figure 2).
- 4.22 As part of my initial assessment of the draft Plan, I noted that the Design Code (May 2025) did not form part of the Submission Plan, and that it is described (at paragraph 6.2) as a separate background evidence

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document. In my assessment, it has a much more significant status than this, and that it should be an Appendix to the Plan with appropriate cross-references to it from Policy VW1 and other relevant parts of the Plan. I **also noted the Borough Council's extensive and detailed comments** regarding the Design Code, and I therefore invited the Qualifying Body (as Question No. 1 – see paragraph 2.9 above) to provide me with a note setting out proposed amendments to the Plan that would address my points of concern, **as well as taking into account the Borough Council's** representations regarding the Design Code.

- 4.23 The Qualifying Body provided me with a detailed response to this question on 27 November 2025, including a series of suggested amendments to the content of Section 6 and Policy VW1, together with suggested amendments to the Design Code document in response to the majority, **but not all, of the Borough Council's comments.** I have given detailed consideration to the proposed amendments, and I am satisfied that they address my specific concerns, and the most important of the Borough **Council's comments regarding the Design Code. Recommended** modification PM1 addresses the necessary changes to the Policy, its supporting text and to the accompanying Design Code document which will become Appendix 1 to the Plan. In the case of the numerous amendments to the Design Code, and in the interests of brevity, PM1 refers to the schedule of amendments at Pages 2-4 of the Qualifying **Body's response document.** The Qualifying Body should also take account of matters covered by recommended modification PM8 below.

Local Gaps

- 4.24 **Section 7 is entitled 'Local Gaps' and contains one** Policy (Policy VW2).
- 4.25 Policy VW2 (Local Gap) states that the Plan designates a Local Gap as shown on the Policy Map (Figure 3) for the spatial purpose of preventing the visual coalescence of Virginia Water with the settlements of Englefield Green and Egham. It goes on to state that any proposals for new development that lie within the defined Local Gap must be located and designed in such a way as to prevent the visual coalescence of the settlements. The removal of vegetation which contributes to the landscape within the Gap to facilitate new development will be resisted. It states further that this requirement applies whether the proposals are deemed as **'appropriate development' in the Green Belt or they are judged to have** the very special circumstances required to justify inappropriate development in the Green Belt.
- 4.26 Upon my initial assessment of the draft Plan and the representations that have been submitted concerning this Policy, together with the supporting **'Local Gap Study' document prepared by Briarwood Landscape** Architecture, I raised Question No. 2 (see paragraph 2.9 above), and invited the Qualifying Body to consider the representations that had been made to this Policy, and to provide me with a note on any points arising

from those representations and my own initial assessment (i.e. those that it considers pertinent to my full detailed assessment).

- 4.27 As part of my detailed assessment, I have considered the representations submitted by the Borough Council, CBRE (on behalf of Turn2us), Boyer Planning Ltd. (on behalf of Ashill) and Mr. R. Shaw, together with the **Qualifying Body's response to Question No. 2 dated 27 November 2025**. I visited the area that is proposed to be included in the Local Gap, as defined on Figure 3, during the course of my site visit, and I took account **of the area's** existing landscape character, its topography, the potential visual coalescence between the settlement of Virginia Water and the settlements of Englefield Green and Egham, which both lie to the north of the Plan area, and the nature of existing developments within the area. I also took account of the adopted Runnymede 2030 Local Plan and noted that there are no proposed allocations of land for development within the proposed Local Gap. The area is entirely within the designated Metropolitan Green Belt. The Local Gap Study concludes at paragraph 5.7 **that "Adoption of a Local Gap policy would effectively supplement and reinforce the existing Green Belt policy covering the study area. In so doing, the proposed Local Gap would create an additional layer of protection to the safeguarding of the existing settlement of Virginia Water against the possible erosion of the settlement's landscape setting through the expansion of the adjacent urban edges of Englefield Green and Egham."**
- 4.28 Taking everything that I have seen and read into account, it is my assessment that the proposed Local Gap is a strategic-level Policy which should be a matter for the emerging Local Plan Review to consider, as **part of the Borough Council's** consideration of the future spatial strategy beyond 2030 for the Borough of Runnymede. I reach that view, in part, due to the scale and extent of the proposed Local Gap which I consider to be too excessive, particularly in its western and eastern areas, for the stated purpose of preventing the visual coalescence of Virginia Water with the settlements of Englefield Green and Egham. In terms of assessing the possibility of visual coalescence between those settlements, I consider that the most sensitive area is much smaller and is confined to the more central parts of the area being proposed as a Local Gap. Furthermore, as noted above, the entirety of the proposed Local Gap is within the designated Metropolitan Green Belt, and I do not see a necessity for adding an additional layer of protection to this national policy, as defined in the adopted Local Plan.
- 4.29 **I also note that this section of the Plan is entitled 'Local Gaps'** (i.e. plural) and that is also repeated on Figure 3. Whilst this may only be a generic title, it does suggest to me that, although the Policy only refers to, and proposes, a single Local Gap, the study area potentially does contain some smaller areas that could be more appropriately assessed for such a designation, and which would be more appropriate for a Neighbourhood Plan policy. In the draft Plan, and on Figure 3, such areas have effectively been consolidated into a single proposal. This reinforces my view that the

most sensitive areas within the study area could be identified by a more detailed assessment and be subject to local protection through a Neighbourhood Plan policy. However, these are matters that can only be addressed in a future review of the Plan, which will need to take account of the emerging review of the Runnymede 2030 Local Plan.

- 4.30 Additionally, I also consider that Policy VW1 and the accompanying Design Code at Appendix 1, as both amended by recommended modification PM1, will provide adequate policy guidance for the assessment of development proposals that may be submitted on sites within the Design Character Areas that are within the area of the proposed Local Gap and that there is no obvious necessity at this juncture to add a further layer of policy protection to those areas.
- 4.31 It is my overall conclusion that Policy VW2 and its supporting text in Section 7 including Figure 3 should therefore be deleted from the Plan, as the Policy is not in general conformity with the strategic policies for the area. Recommended modification PM2 addresses the necessary amendments to the draft Plan to take account of my assessment of this Policy, its accompanying supporting text and Figure 3.

Virginia Water Village Centre

- 4.32 Section **8 of the Plan is entitled 'Virginia Water Village Centre'** and contains one Policy (Policy VW3).
- 4.33 Policy VW3 (Virginia Water Village Centre and Railway Station) states that the Plan identifies the Virginia Water Village Centre on the Policy Map (Figure 4). It goes on to state that to maintain the role of the village centre as a vibrant and active place, proposals should prioritise retaining active frontages that support its functionality and appeal. On the ground floors within the village centre development proposals for new or intensified commercial, business, service users, public houses/drinking establishments and hot food take-away uses will be supported provided that the impact on amenity for residents in the immediate area is not unacceptably adversely impacted. Uses that enhance community engagement and activity within, and close to the village centre will be encouraged, ensuring it continues to serve its valued role in the neighbourhood. It further states that proposals to improve the public realm and traffic management around the village centre and railway station to enhance the community function and vitality and viability will be encouraged and supported. Development proposals to redevelop land currently occupied by the railway station ticket office and its immediate environs for a mix of commercial, business and service uses with residential on upper floors will be supported provided the building height does not significantly change the character of the village centre surroundings and is of a design quality that will improve the appearance of the station and views into the village from the Christchurch Road railway bridge. Finally, it states that proposals to introduce traffic calming measures on Christchurch Road and proposals to improve crossing points

in the village centre will be supported, and that proposals to close one of the two road accesses from Christchurch Road into Station Parade to create green space that connects the two parades will be supported.

- 4.34 The Borough Council has made a representation concerning this Policy, noting that paragraph 97 of the NPPF sets out the circumstances in which local planning authorities should refuse planning applications for hot food takeaways and fast-food outlets. As drafted, the Policy expresses support for such uses within the village centre, thereby leading to a possible conflict with national policy. Accordingly, I recommend an amendment to the Policy text to address this issue. I also consider that the final part of the Policy covers matters that are, more appropriately, addressed by the Traffic Management aspirations set out in Section 15 of the Plan, as they are matters covered by other legislation, primarily the Highways Act, 1980. I therefore recommend the deletion of that part of the Policy text. The necessary amendments to this Policy are addressed by recommended modification PM3.

Trumps Green Shopping Parade

- 4.35 Section 9 of the Plan is entitled 'Trumps Green Shopping Parade' and contains one Policy (Policy VW4).
- 4.36 Policy VW4 (Trumps Green Shopping Parade) states that in order to maintain the role of the Trumps Green Shopping Parade as a vibrant and active community function, proposals should prioritise retaining active frontages that support its functionality and appeal. Uses that enhance community engagement and activity within the Parade will be encouraged, ensuring it continues to serve its valued role in the neighbourhood. It goes on to state that proposals to improve the public realm and traffic management around the Parade to enhance its community function and vitality and viability will be encouraged and supported.
- 4.37 I consider that the Policy is suitably drafted, subject to one focused amendment to the second part of the Policy text to make it clear that potential public realm and traffic management proposals around the Parade are addressed more fully by an aspiration set out in Section 15 of the Plan. This amendment is addressed by recommended modification PM4.

Active Travel

- 4.38 Section 10 of the Plan is entitled 'Active Travel' and contains one Policy (Policy VW5).
- 4.39 Policy VW5 (Active Travel) states that, for proposed new developments within the Neighbourhood Area that will require the submission of a Transport Assessment/Statement and/or a Travel Plan to assess the impacts of the development upon the highway and transport network in the surrounding area, necessary mitigation and enhancement measures

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should be identified and implemented to secure improvements for pedestrians and cyclists. It goes on to state that new or improved footpath and cycleway links are encouraged, including those shown on the Active Travel Policy Map (Figure 5). Finally, it states that 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.

- 4.40 I noted during my initial assessment of the draft Plan that the Policy Map at Figure 5 should be Figure 4¹⁶, and the Qualifying Body has confirmed that is the case, in response to Question No. 3 (see paragraph 2.9 above). **I also invited the Qualifying Body to consider the Borough Council's suggested enhancements and amendments to this map. As part of its response, the Qualifying Body has supplied a revised map which I consider addresses the Borough Council's comments satisfactorily.**
- 4.41 **Subject to the replacement of 'Figure 5' with the revised Figure 4 map,** and a focused amendment to the Policy text, I am satisfied that this Policy is suitably drafted. Recommended modification PM5 sets out these necessary amendments.

Highways Environment

- 4.42 **Section 11 of the Plan is entitled 'Highways Environment' and contains one Policy (Policy VW6).**
- 4.43 Policy VW6 (Highways Environment) states that schemes and developments that secure funding within the Neighbourhood Area, including developer contributions, to deliver improvements to highways and the public realm which improve highway safety and residential amenity will be supported.
- 4.44 As part of my initial assessment of the draft Plan, I noted that this Policy, as drafted, 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 is potentially ultra vires in its current form. The Policy therefore requires substantive revision in order to provide effective guidance for 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. As Question No. 4 (see paragraph 2.9 above), I therefore invited the Qualifying Body to consider these points and provide me with the text of a revised Policy that I may consider as a potential modification to the draft Plan.

¹⁶ Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

4.45 In its response to this question, dated 27 November 2025, the Qualifying Body has provided the text of a revised Policy. I have given this careful consideration, and I am satisfied that it addresses the concerns that I had raised above. Accordingly, recommended modification PM6 sets out the necessary revision to this Policy.

Green and Blue Infrastructure Network

4.46 **Section 12 of the Plan is entitled 'Green & Blue Infrastructure Network'** and contains one Policy (Policy VW7).

4.47 Policy VW7 (Green & Blue Infrastructure Network) states that development proposals on land that lies within or immediately adjoining the defined Green and Blue Infrastructure Network as shown on the Policy Map (Figure 6) must demonstrate how they will maintain or enhance its green and blue infrastructure value in that location, by way of their landscaping schemes, layouts, access, and public open space provision. It goes on to state that proposals will be supported where the green and blue infrastructure network will be enhanced to increase connectivity between the site, Biodiversity Opportunity Areas, corridors and across the landscape. It further states that, 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 Section 106 contributions if necessary. It also states that proposals will be supported where they seek to improve the function of the Network, including sequestering carbon through woodland and tree planting and using planters and mini orchards in development schemes. The use of appropriate native species and/or climate resilient species will be required. Finally, it advises that proposals for new buildings, wherever possible, should incorporate grey and rainwater harvesting measures to manage surface water flood risk and habitat enhancement measures, including bat boxes, swift bricks and hedgehog routes.

4.48 The Borough Council has raised substantive concerns regarding this Policy. Furthermore, during my initial assessment of the Plan, I noted **that paragraph 12.3 of the Policy's supporting justification sets out a policy threshold that exceeds the requirements of the Policy itself.** I raised this concern with the Qualifying Body as Question No. 5 (see paragraph 2.9 above), and requested that the Qualifying Body provide me with a note setting out the necessary amendments to the Policy text and to paragraph 12.3 of its supporting justification that I may consider as a modification to the draft Plan.

4.49 I have given careful consideration to the revised text that has been **proposed in the Qualifying Body's response dated 27 November 2025.** In my assessment, whilst this does represent an improvement to the text in the submission Plan, it does not fully address the concerns raised by the Borough Council. I therefore recommend some further amendments to the revised text provided by the Qualifying Body in order to address

matters raised by the Borough Council. The necessary amendments to paragraph 12.3 and to the Policy are set out in recommended modification PM7.

Sustainable Building Design

- 4.50 Section 13 of the draft Plan **is entitled 'Sustainable Building Design' and contains one Policy (Policy VW8).**
- 4.51 Policy VW8 (Sustainable Building Design) is a lengthy Policy and states that development proposals will be supported where they maximise opportunities for passive solar gain and passive cooling through the orientation, layout, massing and landscaping of the development. Major development proposals will demonstrate how this has been addressed in the Energy Statement submitted with a planning application. It goes on to state that for all major developments, a recognised quality regime shall be **implemented that ensures the 'as built' performance (energy use, carbon emissions, indoor air quality, and overheating risk) matches the calculated design performance of dwellings until such a time that performance testing is addressed by Building Regulations.** The provision of a Post-Occupancy Evaluation (POE) will be encouraged. Wherever feasible, **buildings should be certified to a 'Passivhaus' or equivalent standard with a space heating demand of less than 15KWh/m²/year.** It sets out further that development proposals are required to demonstrate that embodied carbon emissions have been minimised by sourcing materials locally where possible and taking into account the embodied carbon emissions of materials based on information provided in a respected materials rating database. It also requires that proposals for major development are to demonstrate how they have considered the lifecycle of buildings and public spaces and the materials used to construct them to reduce lifetime carbon emissions. Finally, it states that, 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.
- 4.52 Upon my initial assessment of the draft Plan, I considered that, as drafted, this Policy does need some redrafting in order to provide a much clearer understanding of its requirements for prospective users of the Plan, many of whom will be concerned with preparing planning applications. I also noted that Surrey County Council (as Lead Local Flood Authority) had 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 SuDS had not been addressed by the Qualifying Body. As Question No. 6 (see paragraph 2.9 above), I therefore invited the Qualifying Body to 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.

- 4.53 In its response to this question, the Qualifying Body provided the text of suggested revisions to the Policy and to the text of supporting paragraphs 13.1-13.11, with paragraph 13.11 being an additional paragraph of text. I have given careful consideration to these suggested revisions which, subject to some further amendments to secure the necessary clarity and to reduce duplication, I consider address my concerns and those raised by the County Council in its representations. Recommended modification PM8 sets out in full the text of the necessary revisions to the Policy and its supporting justification at paragraphs 13.01-13.11.

Community Infrastructure

- 4.54 Section 14 of the draft **Plan is entitled 'Community Infrastructure'** and contains one Policy (Policy VW9).
- 4.55 Policy VW9 (Community Facilities) states that the Plan identifies 21 buildings and their curtilage as community facilities, and which are shown on the accompanying Policy Map (Figure 7). It goes on to state that 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, that all reasonable efforts have been made to improve the operation and management of the business or facility and that the land is no longer a suitable location. In this context, it states that, in the case 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. Finally, it states that in the case of a proposed change of use, the proposed use will be beneficial to the community, including recreational or leisure use.
- 4.56 As part of my initial assessment of the draft Plan, I noted that a representation had been submitted at the Regulation 16 consultation stage by the owners of Site No. 21 (Longfield Lake) in the list of community facilities set out in the Policy stating that it is not a community facility, but is instead a commercial enterprise with access limited to customers for paid leisure activities. I observed that it is possible that there are other commercial enterprises listed within the Policy, but it is also possible that some other commercial facilities, such as private gyms and private health facilities, are not listed. I wished 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. Accordingly, as Question No. 7. I requested that 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.

4.57 In its response to this question, dated 27 November 2025, the Qualifying Body suggests revisions to the Policy text, the accompanying Policy Map (**Figure 7**) and to the **Policy's supporting text**. **I have considered the suggested revisions and, subject to one amendment to address a representation raised by the Borough Council, I concur with the Qualifying Body's suggested revisions, and these are set out as recommended modification PM9.**

Policy Assessment

4.58 It is my assessment that, with recommended modifications PM1 - PM9, I **consider that the draft Plan's policies set out in Sections 6-14** of the Plan are in general conformity with the strategic policies of the adopted Runnymede 2030 Local Plan, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Aspirations

4.59 **Section 15 of the draft Plan is entitled 'Aspirations'** and is identified appropriately in accordance with the advice in the PPG.¹⁷ None of the potential projects that are included in this section are land-use planning policies, but reflect, in the main, the aspirations for various improvements across the Plan area that are being considered by the Neighbourhood Forum. Accordingly, I have not considered this section of the Plan as part **of this examination. However, the Qualifying Body's attention is** drawn to a number of representations which do relate specifically, to the Traffic Management, Walking, Cycling and Parking projects that are listed in this section. **In particular, I draw the Qualifying Body's attention to the** representations submitted by Mr. Samuel Simpson, Mr. Tony Campain and Ms. Shirley Cade which raise detailed points regarding the Traffic Management projects, and to the representation submitted by Tarmac Trading Limited which raises objections to Aspiration VWA2 (Heavy Goods Vehicles). None of the matters raised are within my purview.

Implementation

4.60 **Section 16 of the draft Plan is entitled 'Implementation'**. **It sets out how** the Plan will be implemented under the headings of Development Management, Funding and Implementation Mechanisms and Monitoring and Review. With regard to Monitoring and Review, the Plan states that the Neighbourhood Forum will report on the implementation of the Plan every five years, noting that it may prove necessary to formally review the Plan prior to 2035, for example following a review of the Local Plan or changes in national policy. I am satisfied that this section of the Plan addresses the requirement to review the Plan, if necessary, to take account of the emerging review of the adopted Local Plan and any changes to national policies as they affect the Plan area.

¹⁷ See PPG Reference ID: ID: 41-004-20190509.

Other Matters

4.61 The Borough Council, in its Regulation 16 representations on the draft Plan, has made numerous suggestions on matters that it considers could be further clarified or corrected within the Plan, on the Policy Maps, within the Virginia Water Design Code and in the supporting Community Infrastructure Evidence Base document. These are comprehensively listed at Appendix 1 to the Borough **Council's representations**. Where I consider such matters do more substantively affect the policies in the Plan, I have taken account of the Borough **Council's** comments as part of the recommended modifications in the main body of this report. However, in the interests of brevity, I have not addressed the more focused matters that have been raised by the Borough Council, and these are only summarised at recommended modification PM10, and which are, in all cases, additional to the matters covered by recommended modifications PM1-PM9. These include a number of matters which require correction or additional clarification. I concur with the Borough **Council's comments** and suggestions, which would ensure the necessary legibility and clarity of the Plan for the benefit of its future users. **The Qualifying Body's attention** is drawn to the need to make the necessary corrections that are set out at PM10, and reference should be made to the representations submitted by the Borough Council for more detailed information on each of the matters that are listed at PM10.

Concluding Remarks

4.62 I conclude that, with the recommended modifications to the Plan as summarised above and set out in full in the accompanying Appendix, the Virginia Water Neighbourhood Plan 2024 - 2035 meets the Basic Conditions for Neighbourhood Plans. Other changes (that do not affect the Basic Conditions) could be made prior to the referendum at the Borough **Council's and Forum's** discretion. These could include minor non-material amendments, consequential amendments resulting from the Policy modifications, typographical corrections and factual up-dates.¹⁸

5. Conclusions

Summary

5.1 The Virginia Water Neighbourhood Plan 2024 - 2035 has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for Neighbourhood Plans. I have had regard to all the responses made following consultation on the Plan, and the supporting documents submitted with the Plan, together with the responses to my questions.

¹⁸ PPG Reference ID: 41-106-20190509.

- 5.2 I have made recommendations to modify certain policies and other matters to ensure that the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Virginia Water Neighbourhood Plan 2024-2035, as modified, has no policies or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Area boundary, requiring the referendum to extend to areas beyond the Plan boundary. I therefore recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Virginia Water Neighbourhood Area within the Runnymede Borough Council area.

Overview

- 5.4 It is clear that the Virginia Water Neighbourhood Plan is the product of much hard work undertaken since 2018 by the Forum, its Neighbourhood Plan Steering Group and the many individuals and stakeholders who have contributed to the preparation and development of the Plan. In my assessment, the Plan reflects the land use aspirations and objectives of the Virginia Water community for the future planning of their area up to 2035. The output is a Plan which should help guide the **area's** development over that period, making a positive contribution to informing decision-making on planning applications by Runnymede Borough Council.

Derek Stebbing

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Pages 19-24	<p><u>Section 6 – The Virginia Water Design Code</u></p> <p>Add the Virginia Water Design Code as Appendix 1 to the Plan</p> <p>Paragraph 6.1 – delete existing second sentence of text and replace with:</p> <p>“The Neighbourhood Forum therefore has produced a Design Code (Appendix 1) to manage and guide design matters across the Neighbourhood Area.”</p> <p>Paragraph 6.2 - Delete first sentence of text.</p> <p>Paragraph 6.17 - Delete third sentence.</p> <p>Paragraph 6.35 - Amend second sentence of text to read as follows:</p> <p>“This policy also complements the adopted Runnymede Design Supplementary Planning Document (SPD).”</p> <p><u>Policy VW1</u></p> <p>Delete existing text in full and replace with:</p> <p>“Development proposals must be of high quality and reflect the distinctive character of the Neighbourhood Area in terms of design, bulk and massing, materials and landscaping and accord with the provisions of the Virginia Water Design Code (Appendix 1) 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).</p> <p>As appropriate to the type, scale and location, new development proposals must:</p>

		<ul style="list-style-type: none"> • Ensure that historic character is respected and development is designed to reflect this; • Relate to the existing development pattern in terms of the definition of streets, plot sizes and spaces between buildings; • Be of an appropriate scale, height and density in relation to its setting; • Use materials and architectural details appropriate to the development’s context; • Be of a design with a locally inspired or distinctive character; • Retain existing trees, hedgerows and green spaces where possible and provide appropriate landscaping, planting and boundary treatment; • Not impede the quality of existing important views; and • Provide parking and/or retain existing parking”. <p>Add labels to Figure 2 (VWNP Design Code Policy Map) to clearly identify the six Design Character Areas.</p> <p>Amend the Virginia Water Design Code document, which will be Appendix 1 to the Plan, in accordance with the schedule of amendments set out at Pages 2-4 of the Qualifying Body’s response document to examiner’s Question 1 (as received on 27 November 2025).</p>
PM2	Pages 25-27	<p><u>Section 7 – Local Gaps</u></p> <p>Delete this section of the Plan in full, and amend the Contents Page and other sections of the Plan accordingly.</p>
PM3	Pages 28-31	<p><u>Section 8 – Virginia Water Village Centre Policy VW2</u></p> <p>Delete the words “public houses/drinking establishments and hot food take-away uses” in the second paragraph of Policy text and</p>

		<p>replace with “and public houses/drinking establishments”.</p> <p>Delete the final paragraph of Policy text in full.</p>
PM4	Pages 32 and 33	<p><u>Section 9 – Trumps Green Shopping Parade</u></p> <p>Add new second sentence of text to the second paragraph of Policy text, as follows:</p> <p>“These matters are considered in more detail as part of the Neighbourhood Forum’s Aspirations which are set out in Section 15 of the Plan.”</p>
PM5	Pages 34-36	<p><u>Section 10 – Active Travel</u></p> <p><u>Policy VW5</u></p> <p>Amend second paragraph of Policy text to read as follows:</p> <p>“New and improved footpath and cycleway links are encouraged, including those shown on the Active Travel Policy Map (Figure 4), and Transport Assessments/Statements submitted with development proposals should take account of this Policy Map when designing opportunities for new and improved provision.”</p> <p>Replace the Policy Map presently numbered ‘Figure 5’ in the draft Plan with the updated and amended map, correctly numbered Figure 4, that was supplied as part of the Qualifying Body’s response to examiner’s Question No. 3 on 27 November 2025.</p>
PM6	Pages 37 and 38	<p><u>Section 11 – Highways Environment</u></p> <p><u>Policy VW6</u></p> <p>Delete existing Policy text in full and replace with:</p> <p>“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</p>

		<p>not unacceptably impact residential amenity.</p> <p>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 horse riders.</p> <p>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.”</p>
PM7	Pages 39-41	<p><u>Section 12 – Green & Blue Infrastructure Network</u></p> <p><u>Paragraph 12.3</u></p> <p>Delete existing text in full and replace with:</p> <p>“Accordingly, where required, proposals for new development in the Plan area will need to consider and incorporate green and blue infrastructure provision as part of the development proposals, in line with the guidance contained in the Borough Council’s ‘Green and Blue Infrastructure’ SPD.”</p> <p><u>Policy VW7</u></p> <p>Add new first paragraph of Policy text as follows:</p> <p>“Proposals for new development in the Plan area should take account of Runnymede Borough Council’s ‘Green and Blue Infrastructure’ Supplementary Planning Document (SPD) (November 2021).”</p> <p>Delete third paragraph of Policy text in full.</p>

PM8	Pages 42-45	<p><u>Section 13 – Sustainable Building Design</u></p> <p><u>Policy VW8</u></p> <p>Delete existing Policy text in full and replace with:</p> <p>“The design and standard of any new building should aim to achieve a high level of sustainable design and construction. All new buildings (and redevelopments and extensions to buildings where relevant) should seek to:</p> <ul style="list-style-type: none"> ● Achieve high standards of energy performance and carbon reduction through: <ul style="list-style-type: none"> ● Incorporating high levels of insulation and/or other measures such as the Passivhaus standard to reduce heat loss and increase energy efficiency; ● Incorporating low-carbon heating systems and smart energy-management systems to optimise operational performance; and ● 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. <p>Alterations to existing buildings should be designed with energy reduction in mind and comply with sustainable design and construction standards.</p> <p>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</p>
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		<p>for conserving and enhancing the historic environment.</p> <p>Where required, new development must incorporate sustainable drainage systems (SuDS) to manage surface water drainage effectively and reduce flood risk, in line with the guidance from Surrey County Council as Lead Local Flood Authority.”</p> <p><u>Paragraphs 13.1-13.10</u></p> <p>Delete existing text in full and replace with paragraphs 13.1-13.11 as follows:</p> <p>“13.1 This policy sets out a series of requirements to ensure that wherever possible, new development within the 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 building design. The Runnymede Borough Council toolkit was adopted in March 2024, and can be found here:</p> <p>https://www.runnymede.gov.uk/council-policy-1/net-zero-carbon-toolkit</p> <p>It has been adopted as guidance for developers on how to achieve net zero carbon operational standards beyond those of the adopted Runnymede 2030 Local Plan.</p>
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		<p>13.2 Sustainable building by design means:</p> <ul style="list-style-type: none"> ● Making decisions on layout and orientation of buildings at the outset to maximise the passive design benefits of a site; ● Incorporating a fabric-first approach that prioritises high levels of insulation, airtightness and thermal bridging minimisation, ensuring significant reductions in heat loss; ● 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; and ● Integrating on-site renewable energy generation such as solar photovoltaic panels, solar thermal systems, or other appropriate technologies that demonstrably reduce carbon emissions. <p>13.3 An Energy Statement should be submitted with major development proposals. 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.</p> <p>13.4 The monitoring of energy performance is critical to ensure that planned efficiency is implemented. Constructed buildings may not meet 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 provision is made after the</p>
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		<p>first year of occupation 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 this Plan.</p> <p>13.5 Sections 8.1-8.2 of the Future Homes Standard consultation document puts forward options to assess the energy 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 is recommended until they are introduced as part of the Future Homes Standard in 2026, 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 energy performance.</p> <p>13.6 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 would make its use unfeasible, for example, the topography and orientation of a site. However, using such a design methodology will also ensure that expensive and unnecessary retrofit costs are not passed down to building occupiers in the future. Until such standards can be required by planning policy or Building Regulations, it is hoped that this approach is more generally used.</p> <p>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</p>
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		<p>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 adopted 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:</p> <p>Energy Efficiency and Retrofit in Historic Buildings Historic England</p> <p>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 and Access Statement.</p> <p>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</p>
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		<p>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 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.</p> <p>13.9 Smaller development proposals should include consideration of sustainable building and energy efficiency as part of the Design and Access Statement or Planning Statement accompanying planning applications.</p> <p>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 multi-functional benefits such as increasing biodiversity and, in some cases, providing benefits for amenity and improving water quality. Surrey County Council are the relevant Lead Local Flood Authority for the Plan area.</p> <p>13.11 Every new build or redevelopment project in the Plan area provides an opportunity to make a difference and a contribution towards meeting climate change targets for 2050. This policy seeks to promote sustainable building design for future developments within the Plan area in order to make a significant contribution towards meeting those targets."</p>
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PM9	Pages 46-48	<p><u>Section 14 – Community Infrastructure Policy VW9</u></p> <p>Delete existing Policy text in full and replace with:</p> <p>“The following facilities and their curtilages are identified as important to the community, as shown on the Policy Map (Figure 7):</p> <p><u>Charity-led facilities</u></p> <ol style="list-style-type: none"> 1. Community Centre and Pre-School 2. Trotsworth Hall – 1st Virginia Water Scout Group 3. Royal British Legion 4. Virginia Water Football Club 5. Knowle Hill Tennis Club <p><u>Public Houses</u></p> <ol style="list-style-type: none"> 6. Rose and Crown Public House 7. Rose and Olive Branch Public House 8. The Wheatsheaf Hotel and Pub <p><u>Religious facilities</u></p> <ol style="list-style-type: none"> 9. Christ Church 10. Harvestime Church <p><u>Local Authority Schools</u></p> <p>11. St Ann’s Heath Primary School</p> <ol style="list-style-type: none"> 12. Manor Mead Primary School 12. Manor Mead Primary School 13. Trumps Green Infant School <p><u>Outdoor facilities (owned/maintained by Runnymede Borough Council)</u></p> <ol style="list-style-type: none"> 14. Virginia Water Memorial Gardens 15. King George V Playing Fields 16. Cabrera Trust Riverside Walk 17. Coronation Fields
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		<p>18. Edgell Close Play Area, Stroude</p> <p>19. Cabrera Avenue Playground</p> <p>20. Stroude Road Allotments</p> <p><u>Other facilities</u></p> <p>21. Packers Doctors Surgery</p> <p>22. Library</p> <p>Proposals that will harm or result in the loss of these facilities will be resisted unless it can be clearly demonstrated that:</p> <ul style="list-style-type: none"> ● 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 at least 6 months; ● All reasonable efforts have been made to improve the operation and management of the business or facility; and ● The land is no longer a suitable location. <p>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.</p> <p>In the case of the loss of a public house, it will be assessed whether 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, it will be assessed whether suitable alternative uses or premises exist to meet the needs of the local community.</p> <p>In the case of a proposed change of use, the proposed use will be beneficial to the</p>
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		<p>community, including recreational or leisure use.</p> <p>The provision of new community facilities will be encouraged.”</p> <p>Replace the Policy Map (numbered Figure 7) in the draft Plan with the updated and amended map that was supplied as part of the Qualifying Body’s response to Question No. 7 on 27 November 2025.</p> <p><u>Paragraphs 14.1-14.3</u></p> <p>Delete existing text in full and replace with paragraphs 14.1-14.3 as follows:</p> <p>“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 dependence of the local community on services outside the Neighbourhood Area requiring increased traffic movement.</p> <ul style="list-style-type: none"> ● Services and amenities for education and healthcare include schools (infant & primary), a library, care homes and a doctors surgery. ● The community centres include the Virginia Water Community Centre and Trotsworth Hall (1st Virginia Water Scout Group). ● There are places of worship and commemoration including Christ Church, Harvestime Church and the Virginia Water Memorial Gardens.
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		<ul style="list-style-type: none"> ● 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 three public houses 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 public houses, although they are an important part of community life. <p>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 six months. This reflects the fact that once the premises and land have been lost</p>
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		<p>to this use, then it is very unlikely such facilities will be re-provided elsewhere in the village.</p> <p>14.3 A description and photograph of each community facility is published in the evidence base document alongside the Plan.</p> <p>Community Infrastructure - VIRGINIA WATER NEIGHBOURHOOD PLAN” (Provide web link)</p>
PM10	Various	<p><u>Other Matters</u></p> <p>Runnymede Borough Council has suggested amendments/additions/corrections to the following parts of the draft Plan and its Policy Maps, the Virginia Water Design Code and the supporting Community Infrastructure Evidence Base document to ensure that these documents are accurate and fully up to date¹⁹:</p> <p><u>Draft Plan and Policy Maps</u></p> <ul style="list-style-type: none"> • Suggested Policy Index in the Plan • Paragraphs 1.6, 1.8, 6.6, 6.17, 6.31 and 15.1 • The Plan’s Vision • Figures 4 and 6 <p><u>Community Infrastructure Evidence Base document</u></p> <ul style="list-style-type: none"> • Pages 8 and 9 <p><u>Virginia Water Design Code (see also recommended modification PM1)</u></p> <ul style="list-style-type: none"> • Paragraphs 1.4, 1.7 and 2.1 • Map of Character Areas • Character Area A – 10 comments • Character Area B - 8 comments • Character Area C – 6 comments • Character Area D – 6 comments • Character Area E – 5 comments • Character Area F – 10 comments • Character Area G – 8 comments

¹⁹ View at: <https://www.runnymede.gov.uk/downloads/file/2856/vwnp-rbc-response>
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		The Qualifying Body should liaise with the Borough Council to ensure that all necessary amendments are addressed and agreed.
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