



VIRGINIA WATER NEIGHBOURHOOD PLAN CONSULTATION STATEMENT 2025

Reg 16 (of the Neighbourhood Plan Regulations 2012)

Consultation Document





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1. INTRODUCTION

Statutory Requirements for this Statement

- 1.1 This Consultation Statement has been prepared to complete the legal obligations of the Neighbourhood Planning Regulations 2012 (as amended).
- 1.2 Section 15(2). Part 5 of the Regulations sets out what a Consultation Statement should contain:
 - contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - explains how they were consulted;
 - summarises the main issues and concerns raised by the persons consulted;
 - describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

The Aims of the Plan

- 1.3 During critical years of engagement, particularly during the pandemic in 2019 and 2020, the Steering Committee skilfully navigated the challenges of Covid lockdowns that greatly limited public activities.
- 1.4 Despite these hurdles, the Committee maintained flexibility, shifting in-person meetings to Zoom calls with Planning Consultants, Steering Group members and the AGM's to ensure continued progress.
- 1.5 Furthermore, three detailed village-wide questionnaires were distributed to residents and businesses as part of the consultation process. These questionnaire links are available in Appendices.

Amendment to the Duration Date of the Plan

- 1.6 The Virginia Water Neighbourhood Plan's end date has been extended from 2030 to 2035 to increase its continued relevance in shaping the future of our community.
- 1.7 Whilst the Runnymede Local Plan runs until 2030, our Neighbourhood Plan does not allocate sites, nor do its policies rely on specific dates or timeframes. As such, this extension does not affect the Plan's content but provides a longer-term framework for guiding local development and decision-making.
- 1.8 This approach ensures that the Plan remains effective beyond 2030, supporting sustainable growth and protecting the character of Virginia Water in alignment with the aspirations of residents and stakeholders.

2. PRE-REGULATION 14 CONSULTATION

Summary of Community Engagement

- 2.1 From the outset, engaging with the widest possible cross-section of the community was a priority in developing our Neighbourhood Plan.
- 2.2 We recognised that the Plan would be most effective if it truly reflected the views and aspirations of the people who live and work here.
- 2.3 To ensure broad participation and transparency, we undertook the following steps:

Fact Finding Public Questionnaire / Summary

Online village survey

- 2.4 Initial community engagement began in late 2019 with an online village survey, widely advertised in Virginia Water via posters, banners, we delivered leaflets to all properties throughout the village and advertised within the December 2019 issue of the Connection magazine.
- 2.5 Printed questionnaires were also available to complete in the Virginia Water Library



Figure 1 December 2019 issue of the Connection magazine



Figure 2 Posters were displayed and leaflets were delivered throughout the village



Figure 3 Banners were displayed throughout the village.

Dec 2019 to March 2020 with a call to action to complete the questionnaire.



2.6

This questionnaire was a fact-finding exercise to capture the concerns and aspirations of the residents.

2.7 Over 650 responses were received, and the questions included:

Do you live or work within the Virginia Water Neighbourhood Boundary area?

2.8 99% of people completing the survey confirmed they were residents of the Virginia Water village.

How long have you lived within the Virginia Water Neighbourhood Boundary area?

2.9 43% of residents completing the survey confirmed they had lived in the village for more than 15 years with 30% confirming they had lived in the village between 5 and 15 years.

If you work within the Neighbourhood Plan area are you; employed, full-time education, retired, self-employed, working from home, or other?

2.10 For the majority who responded to this question 41% were retired and 20% employed.

If you travel outside of Virginia Water to your place of work please state the postcode.

2.11 The majority indicated they travelled in and around London to/from work.

If you travel to work do you travel; by car, by bicycle, by bus, by motorcycle, by train or on foot?

2.12 The majority of 56% commute to their place of work by car, with 30% travelling by train. A small number 4% walk to work.

Do you think travel both within the Neighbourhood Plan area and from Virginia Water to other destinations could be improved?

2.13 81% of residents agreed that travel in and around Virginia Water could be improved with more frequent bus services, offering connections to Windsor, Egham, the lake, and Heathrow.

2.14 They also highlighted the need to address traffic bottlenecks, particularly at Trumps Green Bridge and St Ann's Heath School during pick-up times.

2.15 Suggestions to reduce road congestion included improving traffic light sequencing, especially at Christchurch and Stroude Road, with some proposing the installation of a roundabout as a possible solution.

How do you rate the key facilities/services available to the community within the village; doctors & health, education, emergency services, facilities for the elderly, facilities for young people, open space, parking, shops, sports & leisure facilities, or other.



- 2.16 Residents expressed dissatisfaction in several key areas: 52% rated the facilities for young people as poor or very poor, and 42% highlighted parking within the village as a significant issue. Many suggested that improving parking near retail areas would encourage local shopping and visits to amenities like the library.
- 2.17 Some also recommended free parking for residents, along with a free 20-minute pick-up zone at the train station to reduce congestion along the parade.
- 2.18 Additional feedback called for the return of essential retail services, such as a bank, butcher, greengrocer, and fishmonger.
- 2.19 Concerns were also raised about poor accessibility for people with disabilities and prams between Trumps Green and the train station, as well as the need for improvements to the station's buildings and layout.

How safe do you feel around the village; walking & jogging, cycling or at home?

- 2.20 The majority of residents felt safe/very safe in their homes, whereas nearly 20% reported feeling unsafe cycling around the village.

Do you feel the village is well serviced within the appropriate street lighting?

- 2.21 45% of residents felt there was appropriate street lighting around the village, however various comments were received regarding the lack of lighting in Stroude Road.

Do you think that more should be done in Virginia Water to assist people who have disabilities?

- 2.22 Nearly 30% of residents expressed the need for more pedestrian crossings to enhance road safety, particularly on Christchurch Road for access to shops, as well as Wellington Avenue and Trumps Green Road.
- 2.23 They also highlighted concerns about narrow footpaths and the need for more level pavements.
- 2.24 Additionally, residents felt that the number of disability parking bays in the car parks was insufficient, with only two bays currently available.

Please rank in order of concern on environmental issues applicable to Virginia Water; aircraft noise, air pollution, lack of trees/open space, wildlife areas, loss of green belt, traffic noise/traffic speed.

- 2.25 Residents raised various environmental concerns, including the loss of Green Belt land, as well as issues related to traffic speed and noise.

Would you be willing to see more housing built in Virginia Water?

- 2.26 70% of residents expressed opposition to the construction of any additional housing in Virginia Water.

If yes, what type of homes do you consider that we need more of in Virginia Water? Affordable, bungalows, care homes/senior living, detached 1-3 bed, detached 4 bed +, flats, rental accommodation, self build, semi detached, starter homes, terraced.

- 2.27 Affordable homes emerged as the most preferred type of new property needed in the village, with over 50% of residents supporting their development.



Starter homes and 1- to 3-bedroom detached houses also received strong support.

If no, please state why?

- 2.28 Residents felt that the current infrastructure is inadequate to support a larger population, and encroaching on the Green Belt would be unacceptable.

Can you think of any area, or piece of land, within the Neighbourhood Plan area where new building could take place either for housing or for other users?

- 2.29 There was no land to be put forward as the majority of the Neighbourhood boundary is within Green Belt.

Can you think of any area or piece of land within the Neighbourhood Plan area where new building should definitely not take place?

- 2.30 The majority of residents felt Green Belt land should not be considered for any new development.

Can you say what harm it would do if such development were to be permitted?

- 2.31 It was felt the Longcross development has created an urgent need to reassess the village's infrastructure to ensure it can accommodate the growing demands.

Do you have any additional comments that could help form our Neighbourhood Plan?

- 2.32 Virginia Water should focus on preserving its character and open spaces, fostering a stronger sense of community for younger residents, assisting the elderly and disabled, and avoiding overdevelopment—such growth is more suited for cities, not villages.

These survey results are also available to be viewed through our website.



Timeline of Events

September 2018	The Virginia Water Summit Meeting was held at The Royal Standard Public House, with 25 residents in attendance. The meeting focused on several key agenda items, including finalising the map boundary of the Neighbourhood Plan, discussing the foundational principles of the Constitution, gathering ideas and objectives from the community, and establishing a working forum to oversee the plan's development. During the meeting, a proposal was made to include Thorpe Green and the surrounding houses within the Virginia Water Neighbourhood Plan boundary, as these areas had been excluded from the Thorpe Plan. However, this proposal was ultimately rejected by the Local Planning Authority (LPA). The application for the Neighbourhood Plan was formally submitted to Runnymede Borough Council (RBC) on December 12th, 2018, and received approval in April 2019.
	Residents who had shown interest in volunteering for the Steering Committee were contacted and invited to participate in the inaugural Neighbourhood Plan (NP) meeting, where the Steering Committee was formed.
June 2019	A stall was set up at the Carnival Capers/Trumps Green event, allowing for members of the Virginia Water Neighbourhood Forum (VWNF) to engage with the local community. The primary goal was to raise awareness about the Neighbourhood Plan and gather contact details from interested residents, ensuring they stayed informed about the project's progress.
July 2019	St Ann's Heath Junior School Fete, the VWNF held a stall to connect with the local community. Their goal was to inform residents about the Neighbourhood Plan and gather contact information from those interested in staying updated on the project's development.
	Members of the VWNF attended the Trumps Green Village Fair, to advise residents from the local community about the VWNF, and to collect contact details from interested residents to keep them informed about the project's progress.
	A presentation was given at the Virginia Park Annual General Meeting (AGM) to communicate the concept of the VWNF. There were approximately 50 residents in attendance. 7 contact details were collected from residents who said they wished to be kept informed of progress.
October 2019	The Virginia Water Neighbourhood Plan and Boundary Map were uploaded onto the Runnymede Borough Council website for public information.



November 2019 through to February 2020	Village wide questionnaire (available to all residents and business/non residents). Received over 650 responses from the residents of VW and over 50 from business owners/non residents. See previous sub section (2.ii) for detailed questions/responses. The responses showing most concerns, lead to the VWNP policies being created.
December 2019	VWNF Executive members held meetings with the Englefield Green and Thorpes Neighbourhood Forum management teams to explore the best approaches for demonstrating collaboration between the villages.
	Noticeboard article featured in the village wide Connections magazine, refer to Section 2. Pre-Regulation 14 Consultation within this document 2.5 (Fig 1).
	Promotional information was displayed at the Wentworth Residents Association's annual Christmas Drinks Reception. Additionally, there was an opportunity to address the residents, encouraging them to visit the website and provide input by completing the online questionnaire.
	VWNP banners were displayed throughout the village, including Great Windsor Park entrance (moved to the entrance on the A30), and on the railings at the train station and VW community hall.
January 2020	During January 2020 5,000 leaflets were delivered throughout Virginia Water.
	The Chairman visited Merlewood Care Home and VW Library to meet residents and visitors to give details about the forthcoming Plans and to hear their comments and answer any questions.
	At the 2019 AGM of the Wentworth Residents Association, the VWNF Chair presented and gave an update on the progress made so far, emphasising the significance of having a Plan in place for the Virginia Water village. The Chair was also available to address any questions from attendees. Additionally, the importance of registering as a forum member was underscored.
	The Chairman attended a networking lunch at Sunrise Senior Living, providing an open opportunity to meet with local residents and business owners. During the event, the Chairman shared further details about the vision and the draft Plan and answered any questions raised.
February 2020	Various times throughout February 2020 the Chairman visited the coffee morning groups at Virginia Water library joining their weekly open sessions, giving updates and information on the VWNP.
	An open session was held with Virginia Park residents to facilitate discussions, gather input, and address any questions or concerns they may have had.



January 2021	During the 2020 AGM of the Wentworth Residents Association, the VWNF Chairman gave an update on the progress made to date and stressed the importance of establishing a Plan for the Virginia Water village. The Chairman also gave the opportunity for attendees to ask questions.
May 2021	At the Virginia Water Village Fete, the VWNF hosted a stall to engage with the community and provide information. A tombola was organised at the stall, raising £250 to support the Forum's funding. The event was well-supported, with notable attendees including the Mayor, MP Ben Spencer, Cllr Jonathan Hulley, and Cllr Chris Howorth.
December 2021	VWNP AGM, notice was uploaded on the VWNP website of the AGM meeting date.
January 2022	A double-page article was included in the Wentworth Residents Association annual membership pack, providing details on progress and how to contact the management committee.
	VWNP AGM, held on Teams.
March 2022	Members of the executive committee met with members of the Network Rail team to discuss improvements to the forecourt of the station, the facilities and improved parking and traffic movement layouts.
May 2022	Virginia Water Village Fete where VWNP hosted a stall to engage with the community to give details and progress reports and to answer any questions.
January 2023	Wentworth Residents Association annual membership pack. Double page article giving information, details on progress and how to contact the management committee.
February 2023	Wentworth Residents Association AGM. A presentation on the draft Plan was given by the Chairman.
May 2023	Virginia Water Village Fete, where plans and maps were displayed with full engagement with residents of the village. The Chairman was also interviewed live on air by Surrey Radio to raise further local awareness.
July 2023	Notice of Trumps Green School public open session dates uploaded on the VWNP website.
	2,000 leaflets were delivered in the area to inform residents of the forthcoming public open session at Trumps Green School.
	The Chairman held an Open Forum meeting with local shopkeepers and residents. Various areas were discussed including improved parking facilities at Trumps Green retail parade, safer crossings and cleared public footpaths and paving.
	VWNP AGM, a notice of the date of AGM uploaded to website.
August 2023	VWNP AGM held on Teams.
August 2023	1,000 flyers were delivered to homes local to the Trumps Green retail parade highlighting what was felt as being the main areas of concern.
December 2023	Regulation 14. Emails were sent to all Forum members to notify them of the VWNF entering into Regulation



January 2024	Regulation 14 - Public Consultation held in the Community Hall in Virginia Water, where plans and summaries were displayed for the public to review. Members of the Executive Committee were on hand to speak with residents and answer any questions. Further details of this event can be found in Section 3 of this document, Regulation 14 Consultation. Public Engagement & Promotion.
February 2024	Regulation 14 – Public Consultation held in St Ann's Heath Junior School in Virginia Water, where plans and summaries were displayed for the public to review. Members of the Executive Community were on hand to speak with residents and answer any questions. Further details of this event can be found in Section 3 of this document, Regulation 14 Consultation. Public Engagement & Promotion.
	Design Code meeting with Rob Clarke and Wentworth Roads Committee.
March 2024	Front Cover and Pin Board Notice article featured in the village wide The Virginia Water Magazine, refer to Section 3. Regulation 14 Consultation : Public Engagement and Promotion.
	Wentworth Residents Association AGM. A VWNP presentation on the draft Plan was given by the Chairman informing residents of updates and vision.
May 2024	Forum meeting held in St Ann's Heath Junior School.
September 2024	VWNP AGM, a notice of the date of AGM uploaded onto website.
October 2024	VWNP AGM held at St Ann's Heath Junior School, attending by over 30 residents. Chairman's and Treasurer's reports were shared along with re-election of officers, and status updates were given.
March 2025	With the close of Regulation 14, the Chairman presented at the Wentworth Residents Association AGM, and delivered an insightful presentation on the draft Neighbourhood Plan (VWNP), sharing key updates and an inspiring vision for the community's future.
June 2025	Members of Forum were sent email notification of combined AGM and the vote on submitting the draft Plan to the LPA. A proxy voting option was also given. Meeting to be held at St Ann's Heath Junior school.
July 2025	Notice of AGM was uploaded onto the VWNP website.
	Combined meeting to vote on the submission of the Plan and the AGM held at St Ann's Heath Junior school. Agenda items A vote on the submission of the Neighbourhood Plan, Overview of the Forum's current status, Chairman's Annual Update, Treasurer's Report, Election of Officers plus Q&A from Forum members.

In addition to the above, further meetings have been held throughout this process with the following businesses and stakeholders;

- Wentworth Estate Roads Committee
- Wentworth Residents Association
- Wentworth Golf Club
- DP World Tour / PGA
- Tarmac Surfacing
- Crown Estates



- Royal Holloway University
- Neighbourhood Plan Chairman for Englefield Green, Thorpe and Egham

Publications and Community Events



Figure 4 – 12 December 2018 John Pyle, Chairman and Cllr Jonathan Hulley submitting the Virginia Water Neighbourhood Plan application to RBC



Figure 5 July 2019 Stall held at the St Ann's Heath Junior School Fete



Figure 6 February 2020 An open session was held with the residents of Virginia Park to facilitate discussions, gather input, and address any questions or concerns raised



Figure 7 - VWNF stall was held at the annual Virginia Water Village Fete (May 2021, 2022 & 2023)

- 2.33 During the annual Virginia Water Village Fete (May 2021, 2022 & 2023) members of the VWNF were present to speak directly with members of the community.
- 2.34 These events provided the perfect opportunity to connect with the residents in an informal and approachable setting, where members of the public could ask questions, share their views, and learn more about the aims and progress of the Plan.
- 2.35 This face-to-face engagement not only increased awareness of the Neighbourhood Plan but also raised a stronger connection between the executive committee members and the community, helping ensure that residents felt heard and involved in the planning process.
- 2.36 It was a valuable opportunity to bring the Plan closer to the public and encourage their ongoing participation in shaping the future of the neighbourhood.



Promoting the VWNP through the village

- 2.37 Promoting the VWNP through the village made it more accessible and helped ensure broad community awareness and engagement, which was vital for the Plan's success and crucial for the following reasons;

Raising Awareness

- 2.38 Banners and posters placed in visible areas ensured that residents were kept informed about the Neighbourhood Plan, and to understand its significance for the future of the community.

This visibility helps to reach those who may not already be aware of the emerging Plan.

Encouraging Participation

- 2.39 We felt that public information displays reminded residents that their input was valuable. By promoting the Plan through banners, posters and leaflets, more residents and business workers were likely to engage in the consultation process, attend meetings, and/or contribute feedback.

This helped create a Plan that better reflects the diverse needs and aspirations of the community.



Figure 8 Leaflets were delivered, and posters were displayed inviting residents to join the meeting held in July 2023 to discuss the concerns of the area. This meeting was attended by over 30 residents.

Creating a Sense of Unity

- 2.40 When the entire village is involved and aware of the Neighbourhood Plan, it fosters a collective sense of responsibility and pride in shaping the future of the area.

The presence of banners, posters and the delivery of leaflets reinforce the idea that everyone has a role to play in the planning process.

Visibility of Key Information

- 2.41 Posters, banners and leaflets provided a convenient, easy-to-read source of information, ensuring that key dates, events, and contact details are readily accessible to all, including those who may not use digital and on-line platforms.

Wentworth Residents Association (WRA) Members Annual Booklet and Quarterly Newsletters

- 2.42 Updates were given in the Wentworth Residents Association Members Annual booklet and progress was shared in their quarterly newsletters.



Figure 9 - WRA's Members Annual Update on the progress of the Plan



Figure 10- Examples of the WRA Quarterly Newsletters – Neighbourhood Plan Update



Website & Social Media

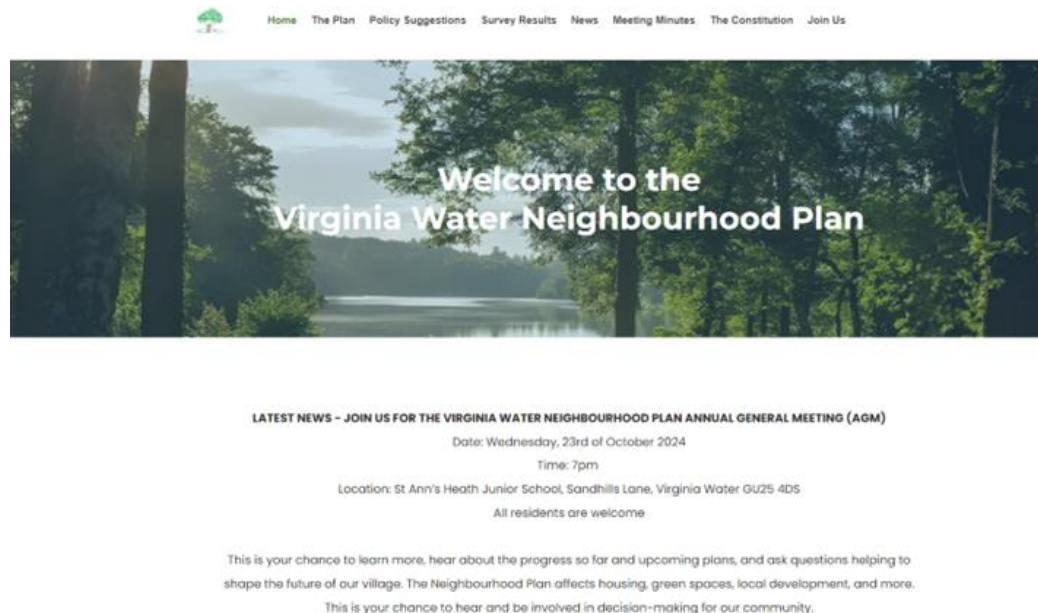


Figure 11 - VWNP Website Home Screen

2.43 The Virginia Water Neighbourhood Plan website <https://virginiawaterplan.org/> was created as an effective communication tool, serving as a direct channel between the Committee and the community and allowing us to reach a wider audience. It also allowed us to give updates about upcoming events and milestones.

We created a Virginia Water Facebook page to highlight events.

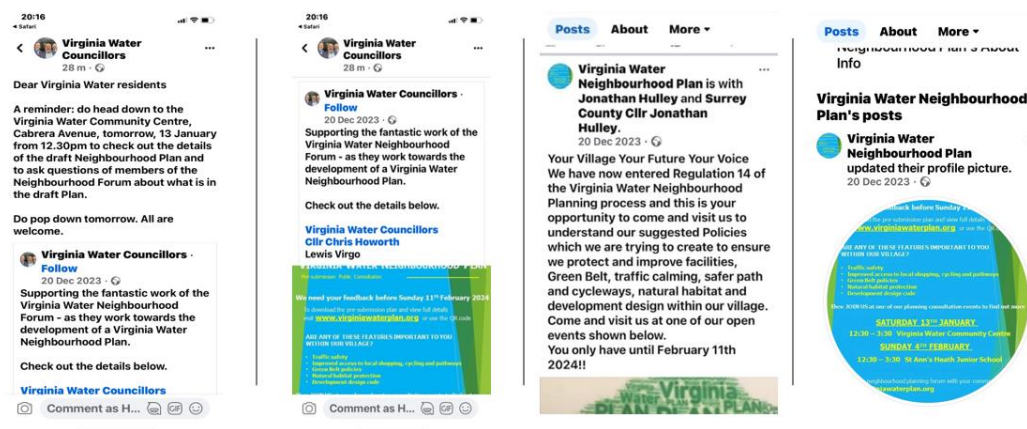


Figure 12 - Virginia Water Neighbourhood Plan Facebook Page

3. REGULATION 14 CONSULTATION : Public Engagement and Promotion

- 3.1 The Virginia Water Neighbourhood Plan Regulation 14 Consultation period was supported by a comprehensive public engagement strategy to ensure widespread awareness and encourage community participation.

General Promotion

3.2 General Public Promotion

To maximise reach, promotional efforts included the distribution of posters throughout the village and door-to-door leaflet deliveries. These materials provided residents with key information about the Plan and the consultation process, ensuring they had the opportunity to engage and share their feedback.



Figure 13 Notices displayed throughout the village of the Reg 14 Public Consultation inviting members of the public to attend our Open Sessions during this time

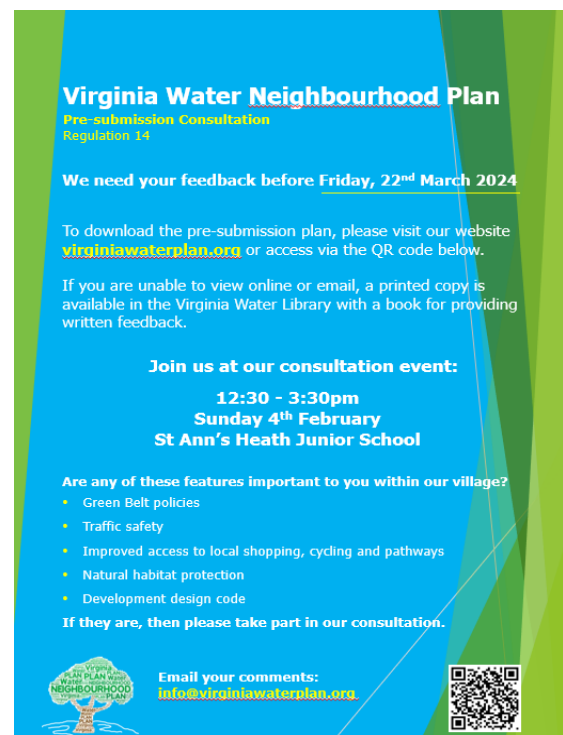


Figure 14 Due to the Reg 14 period running over the festive season and to ensure we captured as much attention as possible, it was agreed between VWNF and RBC to extend the consultation period for a further 4 weeks

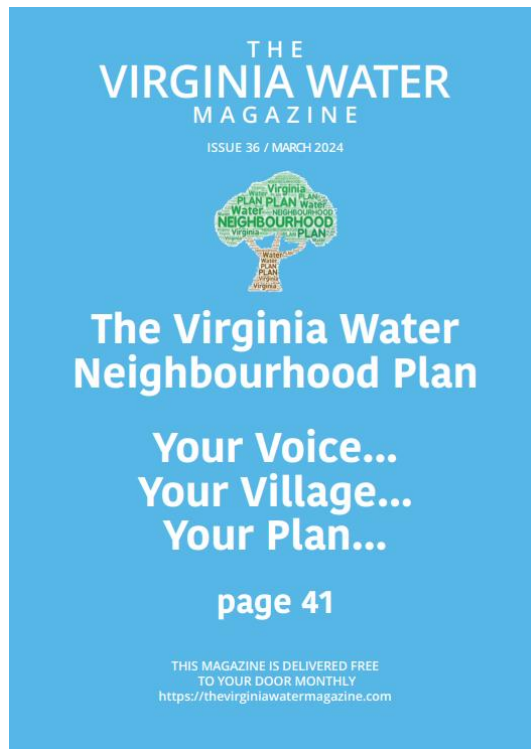


Figure 15 Front cover of the Virginia Water local magazine (March 2024)

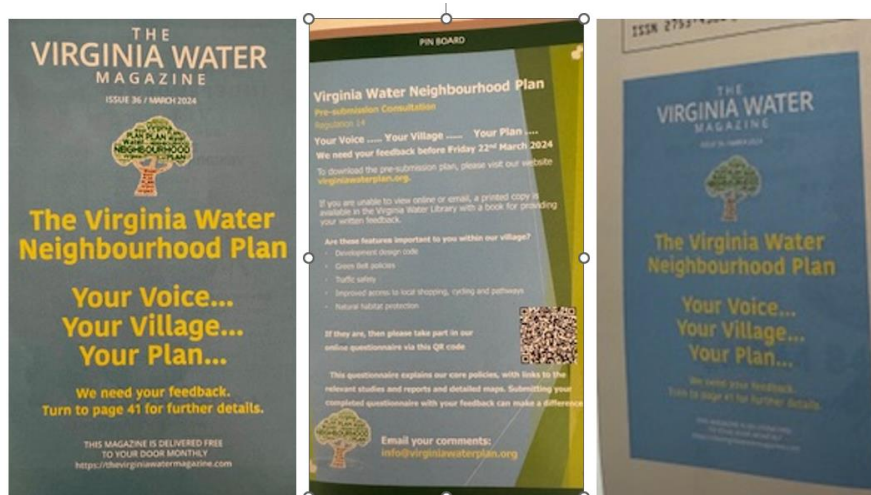


Figure 16 Featuring a full page call to action for residents feedback during Regulation 14 before Friday 22nd March 2024.

Posters Displayed Throughout the Village

- 3.3 The display of posters throughout the village played a crucial role in the Regulation 14 Consultation by ensuring widespread visibility and awareness among residents, giving increased public awareness, reaching a wider audience and encourage participation.

These posters also reinforced the additional promotional efforts, creating a consistent presence.

Overall, the posters were an essential tool in ensuring that as many residents as possible were informed and had the opportunity to engage with and contribute to the Neighbourhood Plan.



Figure 17 Posters were displayed throughout the village including the library (where Executive Summary was available) plus the retail Trumps Green all these locations gave notice of Open Session dates with the Reg 14 period



Figure 18 Executive Summary and notepad were available to view and for residents to leave comments in the Library throughout the Consultation period.

Regulation 14 Leaflet Deliveries

- 3.4 Flyers were delivered to homes in Virginia Water which outlined the objectives of the Plan, the consultation timeline, and ways for residents to provide feedback, encouraging a strong level of community involvement.



Figure 19 Double sided flyers were delivered throughout the village during December 2024

Large Banners Strategically Placed Throughout the Village

- 3.5 Visible banners were strategically positioned at key locations across Virginia Water, including high-traffic areas such as village entrances and main roads. These served as highly visible reminders of the consultation period, reinforcing the importance of community involvement in shaping the future of the village.



Figure 20 Large Banner displayed on the A30 entrance to the Virginia Water Lake

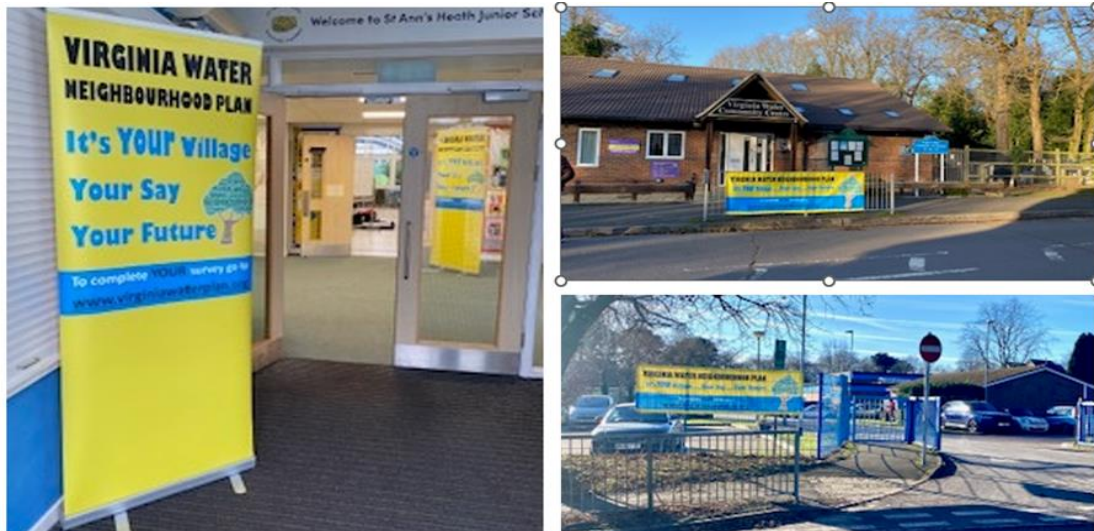


Figure 21 The VWNP banner was displayed throughout the village for the complete duration of Reg 14, this included a very prominent position on the A30 and fences of the Community Centre and St Ann's Heath Junior School

Open Forum Exhibitions

- 3.6 During the consultation period, open exhibitions were held, providing residents with direct access to detailed information about the Neighbourhood Plan. Members of the Executive Committee were present at these events to engage with the public, answer questions, and clarify aspects of the Plan, helping to encourage a deeper understanding of its objectives and implications.

This multi-faceted approach ensured that residents were well-informed and had ample opportunity to contribute their views, strengthening the overall engagement process for the Virginia Water Neighbourhood Plan.



Figure 22 Public Consultation Days held during Regulation 14



Statutory Emails / Responses

Appendix A

Statutory responses received from:

- Shrimplin Brown (Planning Consultants)
- Carter Jones (Tarmac)
- National Highways
- Natural England
- Historic England
- National Grid Electricity
- National Gas Transmission

Appendix B

Statutory response from Runnymede Borough Council

Appendix C

Statutory response from Surrey County Council

Appendix D

Statutory responses from the members of the public

4. CONCLUSION

In conclusion, the consultation process for the Neighbourhood Plan we felt was a resounding success, achieving meaningful engagement with a wide cross-section of the community. Through a series of public meetings, workshops, surveys and stakeholder collaborations, we gathered valuable insights and feedback that has shaped the final Neighbourhood Plan. The level of participation and the quality of responses demonstrated the community's genuine interest in the future of the area.

We have listed to and incorporated the diverse range of views expressed throughout the consultation, ensuring the Plan reflects the needs, aspirations, and priorities of local residents and businesses. This collaborative approach has resulted in a well-informed, balanced Neighbourhood Plan that provides a clear vision for sustainable growth, enhanced amenities, and a strengthened sense of community.

The success of this consultation highlights the importance of ongoing dialogue, and we look forward to continuing to work together to bring the vision of the Neighbourhood Plan to life, ensuring the long-term prosperity and well-being of our village.



5. APPENDICES

The Executive Committee of the Virginia Water Neighbourhood Plan, confirm that the public consultation under Regulation 14 has been conducted. Please refer to the Appendices for detailed feedback received from statutory consultees, including specific responses from Runnymede Borough Council, Surrey County Council, and members of the public.

All comments submitted during the consultation period have been carefully considered by the Executive Committee. Every representation has been reviewed, and decisions regarding any modifications to the plan, along with the rationale for those decisions, are documented.



APPENDIX A –Consultees (Including Statutory Consultees)- Comments Received

Summary of response received from	Comments	Response from Executive Committee
Avison Young on behalf of National Grid Electricity Transmission– no	An assessment has been carried out with respect to NGET’s assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that it has no record of such assets within the Neighbourhood Plan area.	Noted, no change to NP document
Avison Young on Behalf of National Gas Transmission	An assessment has been carried out with respect to National Gas Transmission’s assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.	Noted, no change to NP document



Response received from National Highways

From [Sammantha Rose <Samm.Rose@nationalhighways.co.uk>](mailto:Samm.Rose@nationalhighways.co.uk)

2024-02-14 11:04

For the attention of: The Virginia Water Neighbourhood Forum

Consultation: Pre-Submission Virginia Water Neighbourhood Plan - Regulation 14 (of the Neighbourhood Plan Regulations 2012) Consultation

National Highways Ref: NH/24/04957

Dear Sir/Madam,

Thank you for your e-mail of 5th February inviting National Highways to comment on the above consultation and indicating that a response is required by 22nd March 2024.

On behalf of the Secretary of State for Transport, National Highways is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) as laid down in DfT Circular 01/2022: The Strategic Road Network and The Delivery of Sustainable Development ("the Circular").

We are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. National Highways is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.

In response to your Reg 14 Consultation, I would like to draw your attention to National Highways document '*The Strategic Road Network, Planning for the Future: A guide to working with National Highways on planning matters*' (October 2023). This document sets out how National Highways intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. The document indicates that National Highways will review and provide comments on local plans proposed by local planning authorities that have the potential to affect any part of the SRN.

In this instance, we would specifically be concerned with any proposals which have the potential to the M25 Junction 12/ M3 Junction 2, which are within or in close proximity to the Virginia Water Neighbourhood Area and are subject to congestion at peak times.

We understand that development allocations are not within the remit of the Neighbourhood Plan, and these will instead be determined within the Runnymede 2030 Local Plan. The Neighbourhood Plan does not currently reference any proposed development allocations within the Neighbourhood Area, and therefore there is unlikely to be any potential for significant impacts to the SRN at present. National Highways would expect to be part of early discussions with both developers and Runnymede Borough Council for any proposed future development which is likely to have a significant impact on the SRN.

We welcome the proposals in the Neighbourhood Plan to encourage active travel, and will be supportive of any policies which may off-set strategic car journeys that could otherwise travel on the SRN.



This letter clarifies our views on this Neighbourhood Plan Reg 14 Consultation, primarily focused on the potential impacts of allocated sites on the SRN, and highlights parts of the SRN which may experience significant increases in traffic. Our interest in plan-led system is focused on the council's approach to highway and transport matters in relation to regeneration and new development.

We look forward to continuing to participate in future consultations and discussions. In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at planningse@nationalhighways.co.uk.

Kind Regards,

Sammantha Rose MPlan

Assistant Spatial Planner

Operations Directorate – South East

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

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Response from Executive Committee: Noted, no change to Neighbourhood Plan document



Comments by [REDACTED]

Date 26/2/2024

Draft Neighbourhood Plan / Wentworth Design Guidelines

Overview.

The approach adopted by many Neighbourhood Plans (NP), is to have “High Level” policies that deal with matters of principal and broad intent within the plan and then to have detailed Design Guidelines as a separate document. As an example the Virginia Water NP could have a policy to the effect that within the Wentworth Area, development proposals will be assessed having regard to the design guidelines appended to the local plan. The design guidelines then deal with the detailed guidelines.

Page 24 of the NP - I have added my comments in blue italics with changes to text in red.

6.2 Key Issues in each Neighbourhood

6.2.1 Wentworth Estate

The Wentworth Estate offers a wide diversity of detached housing which is the principal character of the estate. Residents seek to retain this character and therefore require clear separation between buildings on adjacent properties.

The Neighbourhood Plan requires applications to comply to the Wentworth Planning Guidelines which contains well established planning guidance to ensure continued consistency and certainty in the determination of applications. The fiduciary role undertaken by the Wentworth Estate regarding planning matters within the estate may require occasional amendments to their design guidelines. The attached guidelines within the Appendices are the current guidance given by the Estate.

I would question from a planning perspective whether referencing the WERC guidelines directly is correct. This does not mean that principles and details of the design guidelines cannot be included, I just think that there will be resistance to linking directly to a private covenant. As a side point, I could not find the WERC guidelines attached as an appendix to the Neighbourhood Plan.



Elements of the NP detailed below, in my view would be more appropriately included as detailed Design Guidelines.

The Neighbourhood Plan will require the following supplementary guidelines to be met for all detached properties within the estate as a minimum mandatory condition in support of Wentworth's obligations:

1. The Neighbourhood Plan will require planning proposals made within the Wentworth East/Christchurch area to first seek approval from the WERC planning committee before a submission to the Runnymede Borough Council. The intention of this requirement is to convey the estate's position to better inform Runnymede borough council decision making as part of a pre application design process.

Normally planning is entirely separate from private covenants, as such I suspect this requirement may be resisted at the inspection stage.

2. All street facing structure can be no greater in width than 78% of the distance between boundaries as defined by projecting a line along its principal face to those boundaries. Any part of that structure can be no closer to a boundary than 1.5m. This rule applies to all categories of plot sizes within the estate as given in the Wentworth Guidelines. *Where an existing plot exceeds the 78% figure, this will be taken into account when considering development proposals.*

This would be best include as a Design Guideline.

3. The Neighbourhood plan will endorse the Wentworth Estate Roads Committee existing planning guidelines and further recommendations including:

See above comments my view is that the NP should not link to the WERC guidelines.

- Safety of cyclists, pedestrians and golf buggies on private roads, and public thoroughfares.

Are golf buggies permitted on private roads?

- Clear separation of dwellings, hence our policy for smaller plots.

- Restrictions on the extent of new basements.



I would recommend deleting this reference and instead including the basement restriction of no two storey basements and no more than 22% of the plot, as a design guideline. Making a general statement of “restrictions on the extent of new basements” could be misinterpreted.

- Avoidance of hard boundaries.

A definition of what is a hard boundary is required.

- Hedges and chain-link fencing rather than walls and close boarded fencing.
- To retain green open landscape and allow movement of small animals through the Estate.
- adoption of zero carbon housing and “Passivhaus” codes on all new development.

I have forward Ascot Design a copy of policy VW.10 Net Zero Carbon Building Design and asked for their comments. This is not an area of work I get involved with. The spelling of “Passivhaus” suggest using the German company for certification is that the intention?.

I have set out below the text of the design guidelines and added my commentary in **blue** text with amendments in **red** text. The **green** text indicates additional guidelines taken from the Local Plan text.

DESIGN OBJECTIVE(S): CONSERVATION	
The location of all the Character Area in the designated Green Belt requires a minimum of change in its grain and built forms to preserve the essential openness of the Green Belt.	
A13	DESIGNING THE BUILT FORM AND ROOFSCAPE <i>Runnymede Design SPD: The form (layout, height and shape) of buildings on each plot should be considered at the scale of the street, and within the street hierarchy. The design of the roofscape should reinforce the grouping of buildings, and positively contribute to street views and the wider skyline.</i> Guidelines Requirements:



	i) Proposals that include dormer windows and skylights must be in proportion to the roof area in that same elevation. ii) Proposals must not result in a ridge height over a garage or a single storey that exceeds 6.5m. This restriction is not considered appropriate as a design guideline. It only appears in the WERC Planning Guidelines, as a criteria to define when floor area in a roof area over a single storey element, will be included in the floor area to plot area ratio. The WERC guidelines do not take away the right to have a ridge height of over 6.5m over garages and single storey wings. The WERC guidelines simply detail that when over 6.5m, the roof void will be counted as floor area. In its self there is not considered to be any in principal objection to single storey form with raised ridge levels. iii) Proposals must avoid the use of a deep rectangular plan shape, gable ends, and a steeply pitched roof with a flat section at its centre that will result in an inappropriate building mass and bulk for the Character Area. iv) Proposals for buildings using hipped or half hipped roof forms rising to a central ridge will normally be of a mass and bulk that will be appropriate for the Character Area. — <i>Clauses iii and iv have the potential to prevent many classical and contemporary designed houses. The use of steep pitched roofs with a flat top is common place for the classical style houses and necessary to ensure that the 10m height control is not breached. Using a deeper floor plan also allows for enhanced space to the boundaries as it reduces the width of the new houses. I would suggest the following guidance from the WERC General Considerations would be more appropriate:</i> <i>iii Any proposed development should be designed and sited so that it does not detract from the character of the Wentworth Estate.</i> <i>iv Each Property and any development of it should be in harmony with the size, shape and character of its plot.</i>
A14	USING BUILDING HEIGHTS POSITIVELY <i>Runnymede Design SPD: The proposed height of buildings should be carefully justified.</i> Guidelines Requirements: i) Proposals must not result in the height of a dwelling being <i>materially</i> greater than <i>the existing house or</i> the tallest of one or both adjoining dwelling(s) but in any event should not be greater than 10m as its important that homes are not overpowering the woodland (taken from <i>original</i> ground level from the principal elevation towards the



	street). <i>The changes seek to reflect a circumstance where for example the existing houses is taller than the 2 neighbouring houses.</i> ii) Proposals for new outbuildings should have a height to the top of the eaves of up to 2.5m with a maximum ridge height if pitched of 3.5m. <i>This clause is only in the WERC guidelines to define when an outbuilding falls outside the 22% floor area to plot area calculations. There is no in principal planning objection to having outbuildings of a greater height. In fact exempt from planning permission, an outbuilding with a ridge height of 4m can be constructed.</i>
A15	DESIGNING GOOD BUILDINGS <i>Runnymede Design SPD: Developments should provide an appropriate balance of variety and consistency, by relating groups of buildings to common themes, such as building and/or eaves lines, rhythms, materials, or any combination of them.</i> Guidelines Requirements: i) Proposals may adopt a variety of architectural styles in respect of the composition of the buildings and of the appearance of its materials. ii) Proposals that comprise classical architectural styles will be supported, provided they are consistent with all other relevant parts of the Guidelines. iii) Proposals for the erection and installation of renewable energy technologies to a dwelling will be supported, provided they do not comprise solar panels on roof slopes fronting on to a private road, irrespective of any proposed visual mitigation measure (e.g. tree planting) and they do not result in the positioning of an air or ground source heat pump within 3.5m of the plot boundary, unless the pump is of a certified soundproofed specification. <i>Note in certain instances PV panels on the front elevation do not require planning permission. In addition it is possible that a single heat pump is exempt from planning permission.</i>
A16	USING LANDMARKS, GATEWAYS, FOCAL POINTS AND CORNERS TO CREATE VARIETY <i>Runnymede Design SPD: To create variety and aid legibility, development proposals should identify new and existing landmarks, gateways, focal points and corner buildings that have a special status through their form, role or location.</i> Guidelines Requirements:



	i) Proposals on land forming the corners of Christchurch Road with London Road and with Wellington Avenue must acknowledge the special prominence of those locations in the street scene and in the case of London Road as a gateway into the Estate. ii) Proposals must acknowledge the important views along Christchurch Road of the Wheatsheaf Hotel on London Road and the glimpse views of Christ Church. iii) Proposals must acknowledge the role played by some locations in terminating views into the Estate from the outside at Harpesford Avenue and Crown Road. iv) Proposals must acknowledge the role played by some locations on Christchurch Road in terminating views from its private side roads.
A17	PATTERNS OF ACTIVITY <i>Runnymede Design SPD: Places should include a mix of uses that strengthen everyday activities including living, work and play.</i> Guidelines Requirements: i) Proposals for uses other than C3 dwellings will not be supported unless they relate to an established non-dwelling use.
A18	REINFORCING LANDSCAPE CHARACTER AND BIODIVERSITY <i>Runnymede Design SPD: New development and associated landscape should retain, incorporate and enhance features that contribute towards the landscape character and biodiversity of the area.</i> Guidelines Requirements: i) Proposals should acknowledge the way in which the Estate has been carved out from the surrounding woodland and how most plots and buildings are hidden by surrounding tree cover, with long distance views restricted by tree cover in most parts of the character area. ii) Proposals to fell any tree having a diameter of 9" (225mm) or more measured at 2'0" (600mm) above the ground will not be supported unless it can be demonstrated there is sufficient justification to remove the tree or it is dead, dying, dangerous or diseased.



	iii) If it is necessary to remove trees to carry out a development, proposals should make provision for the replacement on a 'one for one' basis or where the existing tree makes an especially important contribution to the amenity value of the street scene, on a 'two or more for one' basis, with replacements being of a reasonable size and quality .of at least 4.5m height and/or 16cm girth. iii) Proposals requiring the loss of a silver birch or leylandii/lawson cypress type of conifer tree will not require replacement. iv) All development should contribute to the delivery of high quality multi-functional networks of Green and Blue Infrastructure (GBI) to provide long-term benefits for people, places and nature, in ways that reinforce local character. v) All development should embed GBI in ways that help support nature recovery, reverse the decline in biodiversity and result in a 'net gain' Proposals will need to demonstrate how they propose to specifically meet the green objectives within the Green Belt <i>Planning can not control the removal of trees that are not within a conservation area or not preserved; as such clause ii is shown to be removed. The stipulation regarding planting size under clause iii has been removed to allow greater flexibility within the policy. Often arboricultural advice is that it is better to plant a smaller tree than a larger tree.</i>
A20	DESIGNING THE SPACE BETWEEN BUILDINGS <i>Runnymede Design SPD: Streets should be designed as 'places'. The detailed design of the street, and the spaces between buildings, must support the overall structure and built form of the development.</i> WERC Planning guidelines offer sympathetic and proportionate development options that reflect the tone of this area and no greater than 22% site coverage and generous distance from the boundaries i) Proposals should show a distance from the boundary of 3.5m minimum for single storey and 4.5m minimum for two storey (for single storey with rooms in the roof it should be 4m) <i>If the 22% plot area ratio is to be introduced as a guideline then it should form a separate Design Guideline with detailed definitions regarding the calculation of the site area and floor area. As well as guidelines regarding the approach to outbuildings. – see green text at the end of this section.</i>
A23	PROVIDING FOR VEHICLE AND CYCLE PARKING



	<i>Runnymede Design SPD: Parking for cars in residential development should aim to accommodate car ownership in a manner that is compatible with local character whilst creating a high-quality environment that functions well.</i> Guidelines Requirements: i) Proposals to move an established access to a new position should ensure it does not create a traffic hazard or adversely affect neighbouring properties, for example reasonable and safe sight lines. ii) Proposals to move an established access to a new position should ensure it is not directly opposite another entrance. iii) Proposals for new driveways across verges must be constructed to an approved specification. iv) Proposals should not lead to the reduction in effectiveness of an existing roadside ditch, which are vital for the removal of surface water from the Estate. v) Proposals for a new driveway that is required to cross a ditch should include a culvert of adequate size should be installed. vi) Proposal should not include new additional driveway entrance.
A24	ENSURING RESIDENTIAL AMENITY <i>Runnymede Design SPD: The Covid 19 outbreak has resulted in many people spending more time at home and it is crucial that places we call home are comfortable.</i> Guidelines Requirements: i) Proposals should not affect the privacy of a neighbour's house and garden or significantly affect neighbours out-look ii) Proposals for new dormer windows in a loft space should be sited to minimise the degree of overlooking of neighbours' houses and property. iii) Proposals for new garages, swimming pools, tennis courts and barbecue areas which may cause noise, smells or other nuisances should be carefully sited to minimise the impact on neighbouring houses. iv) Proposals for outbuildings that comply with Class E of the Town and Country Planning (General Permitted Development) (Amendment) Order 2015, Part 1 – Development within the curtilage of a dwelling house but behind the principal elevation will be considered outside the calculation of the for the percentage of external floor area versus the area of the plot and; — have a maximum ridge height of 3.5m and an eaves height of 2.5m — be of prefabricated structure and assemble on site.



	— the overall size must not exceed 3% of the plot area. v) Applicants should comply with Wentworth Estate covenants and contractor requirements (or such Working Hours that may be permitted by the Estate in the event of the policy being changed. — No demolition, construction work or deliveries should take place outside the hours of 0800hrs and 1700hrs on weekdays, 0800hrs to 1200hrs on Saturdays or at any time on Sundays and Public holidays. — No noisy and/or disruptive siteworks, including the digging out of a basement, piling or other works associated with site preparation should take place on Saturdays. — No fires are allowed. Contractors should adopt Considerate Contractor construction procedures thereby causing the least possible nuisance to the local area. <i>Clause iv is only relevant if the 22% plot area ratio is to be introduced as a guideline. If it is, then the plot area ratio should be introduced as a separate Design Guideline with detailed definitions regarding the calculation of the site area and floor area. As well as guidelines regarding the approach to outbuildings.</i> <i>Clause V relates to matters outside of planning.</i>
A25	REMEMBERING FORGOTTEN ELEMENTS <i>Runnymede Design SPD: 'Forgotten' elements are generally located on or near the street frontage. They must be integrated into proposals so that they are unobtrusive and well designed.</i> Guidelines Requirements: i) Proposals for new electronic gates and associated piers should be set well back into the property and should be proportionate with the house and surroundings in size, and in most cases should not exceed 3.5m in height. ii) Proposals for new gate piers, including any capping or lantern, should be proportionate and in most proposals be no more than 3.0m high and the distance between the piers should not exceed 4m with the bellmouth entrance being of at least 6m. iii) Proposals for new wing walls will not generally be supported, but in cases where they are suitable, they should include evergreen planting to soften their appearance and in most cases the walls must not exceed 2.0m in height (measured overall including any pier caps, lanterns etc.) and be no more than 3.50m in length. WERC prefer: - That gates, piers and wingwalls are proportionate to plot size and street scene.



	iv) Proposals to define plot boundaries should either be evergreen or beech hedges. If a green plastic-coated chain-link fencing type, it should not exceed 1.8m in height and adequately screened with an evergreen or beech hedge. v) Proposals for new security fencing should be of an open design (not solid fencing or walls), in black or green colour, should not exceed 2.0m in height and should include evergreen planting to be hidden from the road or neighbouring properties. vi) Proposals for garden and security lighting should be designed and located so they are not obtrusive to adjoining properties. vii) Proposals for new security cameras should capture areas within the property only and not any neighbour or estate verge or road nor any part of the golf course, with any cameras at access entrances directed and restricted to the bellmouth only.
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The text in the WERC guidelines needs to be worked up as standalone guidelines to avoid reference to the WERC.

Plot Area Ratio Design Guideline

*The size of the new construction is of paramount importance to preserve the character and appearance the size. The size of the proposal will be considered in relation to the size of the plot and it is unlikely that any proposal resulting in the gross **external floor** area of a dwelling (measured over external walls on both ground and first floor) exceeding 22% of the area of the plot (**as defined by the land registry**) will be permitted. This is known as the Plot Ratio. This is strongly upheld in the Green Belt area around the golf courses. It is accepted in the roads north and south of Christchurch Road from the roundabout to the shops the Plot Ratio varies. **Some further text needs to be inserted regarding plot area ratios in the developed area. and it is recommended to contact the Estate office to establish the particular Plot Ratio for the location in question.** The area of the buildings includes garages, swimming pool buildings, **and masonry** garden rooms. Basements, ramps, balconies, lightwells and habitable loft areas within roof spaces will be excluded from the calculation. Dormer windows and skylights are to be proportionate to the size of the roof and the ridge height over a garage or single storey must not exceed 6.5m otherwise the floor area will be included in the assessable area. Note certain garden outbuildings which are exempt from planning permission will be excluded from the calculations.*

Basements

Only single storey basements will be allowed, these can however include a swimming pool.



The size of the basement (excluding lightwells and ramps etc.) must not exceed 22% of the plot area (calculated according to land registry title deed).

It is expected there to be a minimum of 3.5m distance from the basement to the boundary. This includes lightwells and ramps etc.

Guideline on width of street facing built form

All street facing structure can be no greater in width than **either the exiting built form or** 78% of the distance between boundaries as defined by projecting a line along its principal face to those boundaries. Any part of that structure can be no closer to a boundary than 1.5m. This rule applies to all categories of plot sizes within the estate as given in the Wentworth Guidelines.

Response from Executive Committee: Noted, extensive changes have been made both to Neighbourhood Plan document and the Design Code which incorporate and reflect these helpful comments.



Response from Natural England

Date: 09 February 2024
Our ref: 461873
Your ref: Virginia Water Neighbourhood Plan



Virginia Water Neighbourhood Forum

Hornbeam House Crewe Business Park Electra Way
Crewe Cheshire CW1 6GJ

BY EMAIL ONLY

info@viriniawaterplan.org

T 0300 060 3900

Dear Sir/Madam

Virginia Water Neighbourhood Plan – Pre-submission Regulation 14

Thank you for your consultation on the above dated 18 December 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is



likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully Sally Wintle Consultations Team

Response from Executive Committee: Noted, no change to Neighbourhood Plan document



RESPONSE FROM HISTORIC ENGLAND

Dear Sir or Madam

Virginia Water Neighbourhood Plan Regulation 14 Consultation

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Virginia Water Neighbourhood Plan.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers - be they interested members of the public, planners or developers- regarding how the place should develop over the course of the plan period.

Paragraph 196 of the [National Planning Policy Framework](#) (December 2023) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.



We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of your parish features throughout. For further general advice we would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult Runnymede Borough Council conservation officer, and if appropriate the Historic Environment Record at Surrey County Council. It is not necessary to consult Historic England on future iterations of the neighbourhood plan.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Yours sincerely,

Alan Byrne
Historic Environment Planning Adviser

Response from Executive Committee: Noted, no change to Neighbourhood Plan document



TARMAC Representation from Carter Jonas	Response from Executive Committee
On behalf of our client, Tarmac, please find enclosed representations to the Pre-Submission Consultation (Regulation 14) on the Virginia Water Neighbourhood Plan 2023 – 2030 ('VWNP'). The full survey has been completed and is enclosed at Appendix 1. This letter supports and supplements the comments made in the survey. The VWNP is being brought forward by the Virginia Water Neighborhood Forum ('the Forum'). The purpose of the VWNP is to set out a series of planning policies that will be used to determine local planning applications in the period to 2030. The VWNP will form part of the development plan for Runnymede, alongside the adopted Runnymede Local Plan. Policy Position National Planning Policy Framework (NPPF) / National Planning Practice Guidance (NPPG) In order that the VWNP is able to progress towards being a 'made' Neighbourhood Plan (and therefore come into force as part of the wider development plan at a later stage), it will be necessary for it to meet the 'Basic Conditions' and a number of other legal requirements. National planning policy in the shape of the National Planning Policy Framework (NPPF, December 2023) in Paragraph 37 and Footnote 21 highlights that the Basic Conditions are contained in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan. d. the making of the neighbourhood plan contributes to the achievement of sustainable development. Classification L2 - Business Data e. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). f. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations. g. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The NPPF is also clear with regards to the overall scope of neighbourhood plans and distinguishes this from strategic policies which should be contained in local plans. Paragraph 20 lists matters relating to strategic policies as: "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) community facilities (such as health, education and cultural infrastructure); and	There is no requirement for NP's to allocate sites of any type. No change to NP.



d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

In contrast, non-strategic policies (those which can be covered by neighbourhood plans) are outlined in paragraphs 28 – 30 of the NPPF and cover the following areas:

- “Allocating sites;
- The provision of infrastructure and community facilities at a local level;
- Establishing design principles;
- Conserving and enhancing the natural and historic environment; and
- Setting out other development management policies.”

Runnymede Local Plan

The Runnymede 2030 Local Plan was adopted in 2020. The review of the Runnymede 2030 Local Plan commenced in January 2021 but was paused in September 2022 due to uncertainty at a national level because of the proposed planning reforms. Further dates for consultation upon the Local Plan Review are yet to be confirmed as the Runnymede Borough Council is applying for frontrunner status with the Government as part of the new Local Plan making process.

It is against this background that we set out representations to the VWNP Regulation 14 consultation.

The Role of the Neighbourhood Plan

The above national policy extracts set out the role that neighbourhood plans take in formulating local planning policies, the fundamental principle of this being that the strategic policies in local plans are developed with an evidence base that is then subject to a more rigorous examination process compared to that of neighbourhood plans. It is therefore imperative that the scope of the neighbourhood plan policies utilises the evidence available to it and applies it fairly and proportionately to decision-making to ensure that it flows from the strategic policies and contributes to the facilitation of sustainable development and does not unreasonably obstruct the normal workings of the Development Management process.

In light of this, we are supportive of the bringing forward of the VWNP as a means of providing a framework of non-strategic policies which will be used to determine planning applications in the neighbourhood area, however the decision not to include any site allocations results in the VWNP failing to meet the Basic Conditions for Neighbourhood Plans set out in national legislation.

We contend that the Forum must therefore revisit the approach to allocate sites within the VWNP. In particular, the Forum must reassess evidence available on employment sites, as at the wider local level in Runnymede, there is a shortfall as a number of sites which were previously coming forward have fallen away, and the Local Plan includes just one allocation for employment uses (and just one mixed use allocation including employment uses). The stalling of the Local Plan Review means that this position is unlikely to change for a number of years.

Amongst employment uses, the Forum should be considering sites which can support tourism and leisure development. Whilst such uses are not in the bracket of more traditional employment uses, tourism and leisure uses can create a significant number of jobs and boost local tourism, contributing to a thriving local economy. Such uses can also support the VWNP’s objectives of



promoting forms of development that and will actively contribute to the local economy and community as well as supporting recreational provision.	
Background Tarmac is one of the U.K.'s largest land and mineral owners with a controlling interest in approximately 45,000 hectares. Owing to the nature of their activities, a number of sites have ceased to be in operation and where appropriate, these are now promoted for alternative uses including leisure and residential. In terms of current activity, Tarmac's Land Development Team is working on 20 active development projects, which if successful will deliver 10,000 residential dwellings over the next 10 years. The Longside Lake Site is located adjacent to the M25 motorway and is approximately 400m to the north of the M3 / M25 junction. The Site comprises Longside Lake and the surrounding land, with Longside Lake currently used for water sports. Access to the Site is taken from a private road which can be accessed from the eastern side of the M25 via the Thorpe Bypass (B388). It is proposed to maintain this access as part of the proposals for the Site – it is acknowledged that this access point falls outside the VWNP area. The Site is part in Flood Zones 2 and part in Flood Zone 3, which indicates that there is a high risk of flooding, although it is considered that the Site could accommodate more development without increasing risk to its users or nearby residential uses. The Site is also within the Green Belt however it is considered that the proposed use of the Site would be categorised as an exception to inappropriate development within the Green Belt in accordance with Paragraph 154 of the NPPF.	Noted
Draft Policy VW.1 (The Virginia Water Design Code) Draft Policy VW.1 sets out that development proposals must accord with the provisions of the Virginia Water Design Code that are relevant to their location, nature and scale, with seven Design Character Areas set out on the Neighbourhood Plan Policies Map. The Site is draft allocated within the Stroude Valley Design Code Character Area and it is considered that the redevelopment of the Site can incorporate the local requirements set within the Design Code. Draft Policy VW.1 is supported in principle.	Noted
Draft Policy VW.4 (Stroude Valley Masterplan) The Site is draft allocated within the Stroude Valley Design Code Character Area, where proposals to develop vacant, unkempt and/or previously used land will be supported, provided that they accord with the Stroude Valley Masterplan. This is further explained through Draft Policy VW.4, which states that proposals will be required to accord with an emerging masterplan which will identify how Stroude Valley may accommodate new development without undermining the essential purposes of the Green Belt. In due course, the policy may be implemented by the Forum bringing forward a Neighbourhood Development Order (NDO) for this area. As the Masterplan must be able to show that its development provisions will preserve the openness of the Green Belt, proposals brought forward in accordance with the NDO would benefit from the exemption provided by NPPF and therefore would not be deemed 'inappropriate' development as a matter of principle. The principle of Draft Policy VW.4 is supported, although the Council must consult with local stakeholders and landowners upon the Stroude Valley Masterplan when it is brought forward, to ensure that it does not hinder the development needs of the area. The proposal to bring forward a NDO is also supported. As set out previously, it is considered that the proposed use of the Site would not be deemed 'inappropriate' development within the Green Belt and could therefore benefit from such a provision.	Noted, this policy is now an aspiration in the NP.



Despite this, the Site should be allocated for tourism and leisure development regardless, as set out in more detail later in this letter.	
Policy VW.9 (Virginia Water Green & Blue Infrastructure Network) Draft Policy VW.9 states that development proposals on land that lies within or immediately adjoining the defined Green & Blue Infrastructure Network must demonstrate how they will maintain or enhance its green infrastructure value in that location, by way of their landscaping schemes, layouts, access and public open space provision. The draft policies map illustrates that the Site adjoins the Green & Blue Infrastructure Network to the west and north. Draft Policy VW.9 is supported, and the development of the Site for a tourism and leisure use offers the opportunity to enhance the Site's green infrastructure and expand the existing network within the Neighbourhood Plan area.	Noted
Policy VW.11 (Community Infrastructure) The Neighbourhood Plan identifies Longside Lake as a community facility, where in accordance with draft Policy VW.9, proposals that will result in harm or result in the loss of a local community use will be resisted. Policy VW.9 must provide greater flexibility to ensure that changes of use for alternative recreational / leisure uses are not resisted (such as tourism generating uses). We therefore suggest the following amended wording for Policy VW.9: "Proposals that will harm or result in the loss of a local community use or pub will be resisted, unless the proposal is for a change of use for an alternative recreational or leisure use, or unless it can be clearly demonstrated that..."	Noted, minor change to Community Facilities policy
The case for the allocation of the Site for Tourism and Leisure Paragraph 88 of the NPPF states that planning policies and decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside. Given the Site's accessible location, its existing leisure uses, and its natural beauty and features, it is considered that the Site offers a fantastic opportunity for tourism-led development which would involve the adding holiday lodges to provide overnight accommodation and provide a tourism and leisure use for the Site. It is noted that further work is required to understand site capacity including holiday lodge quantum. It is considered that the principle proposed redevelopment of the Site would fully accord with the emerging VWNP policies subject to the suggested amendment being made to the wording of Policy VW.9. The proposed use of the Site for tourism and leisure would not increase flood risk to its users or nearby residential uses and would be categorised as an exception to inappropriate development within the Green Belt in accordance with Paragraph 154 of the NPPF. Summary and Conclusion We are supportive of the bringing forward of the VWNP as a means of providing a framework of non-strategic policies which will be used to determine planning applications in the neighbourhood area. Despite this, we contend that, if the VWNP is to successfully meet the Basic Conditions for Neighbourhood Plans set out in national legislation, it must include site allocations, including those which can deliver leisure and tourism, in particular in the context of the wider local shortfall of employment sites which are coming forward within Runnymede. We have set out a strong case for the allocation of the Site for tourism and leisure development. Whilst Tarmac have proposed such an allocation for the neighbourhood plan we would welcome this and other uses on the property, and would welcome the opportunity to work with the Forum to bring forward the Site.	Noted, however no allocations will be made in the NP.



APPENDIX B – Runnymede Borough Council

Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
N/A	Multiple	NPPF (in general)	Due to the publication of the revised NPPF on 20 th December 2023, paragraph numbers relating to the NPPF throughout the Plan will need to be updated. It may be useful to add the dates (e.g. 2023) after any references to the NPPF to provide clarity as to which version is being referred to, as we are expecting another version to be produced in the near future.	Noted, a further revised NPPF was published December 2024. The paragraph numbers have been updated for this version	Yes, changes to NPPF para references
N/A	Multiple	N/A	It would be helpful for the text of the policies themselves to be clearly separated from the supporting text. Currently it is unclear what parts of the Plan are specific policies, and which parts are supporting text.	Noted, Policies are now in a box	Yes
N/A	Multiple	N/A	It would be helpful for all paragraphs throughout the Plan to have their own numbers. This will enable people commenting on the Plan to be more specific when addressing issues, sections, text etc. It will also make it easier for officers to use when the Plan is in place.	Noted, numbering added	Yes
N/A	Throughout	N/A	The use of 'Grade 1' and 'Grade I' etc is inconsistent throughout the plan should be 'Grade I'.	Noted, changes made	Yes
N/A	Multiple	N/A	Runnymede is a borough, not a district.	Noted	Yes
Foreword	P4	NA	It is considered that this section does not set out a positive vision for the area, as required by the NPPF. The wording is highly negative in places and so it should be amended to conform with the wording of the NPPF. Officers believe there is a risk that an Examiner may consider the draft Neighbourhood Plan's policies and overarching principles come across as protectionist and failing to promote sustainable development – a Basic Condition that must be met if the NP is to be recommended for Referendum. In the second paragraph there are factual errors in relation to the allocation discussed. The site (allocated under Policy SL10, Virginia Water South) is	Noted, wording changed	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
			allocated for 140, not 150 dwellings. It also lies within the village and is not therefore in the Green Belt. At the end of the 5th paragraph there is mention of a 'contiguous strategic vision with adjoining Thorpe, Englefield Green, Sunningdale and Windlesham Neighbourhood Plans'. However, there is no evidence for this, what it means, how it will be implemented, or if there is any buy-in from the other areas mentioned. There is also no policy in the plan that relates to this either. The purpose of including this statement is therefore questioned. The final sentence seems disjointed / isolated and may work better if it is incorporated with the one above.		
1.2	P6	N/A	In the second paragraph on page six it states that modifications will be made as necessary to reflect any changes to 'the district' guidelines' – is it not clear what is being referred to here. Does this mean supplementary guidance e.g. SPDs etc? Clarity here would be useful.	Noted	Paragraph deleted
2.2	P7	Local Plan policies SL9 and SL10	Under the list of policies referred to in this section, you need to add Policies SL9 and SL10 as these two policies are clearly key policies, as they relate to housing allocations in the neighbourhood area.	Added	Yes
2.4	P8	GBI SPD	The Green and Blue Infrastructure SPD was adopted in November 2021 so the first paragraph under this section needs to be amended to reflect this.	Noted	
2.4	P8	National Model Design Code	The first sentence in this paragraph refers to the 'National Model Design Guidelines'. Is this supposed to be referring to the National Model Design Code (National Model Design Code - GOV.UK (www.gov.uk)) or the National Design Guide (https://www.gov.uk/government/publications/national-design-guide)? Clarity here would be useful.	Noted, reference changed	Yes
3.1	P9	N/A	The first paragraph under this section is confusing, as it implies that there is no single place known as Virginia Water, and that it is a cover-all name for a number of smaller places. Yet, the previous sentence refers to the village of Virginia Water? Should it say 'Virginia Water includes the settlements of Trumps Green...', or should it state that the Virginia Water Neighbourhood Area covers a number of places including...	Noted, wording changed	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
			The second sentence in the second paragraph in this section seems as though it is missing a reference to another village that is separated from Virginia Water by Windsor Great Park.		
3.2	P10	N/A	The third paragraph under this section is confusing, particularly the second sentence, the meaning of which is not clear. In addition, the latter parts of the first sentence do not seem to be relevant to the description of the residential character of the village.	Noted, wording changed	Yes
3.3.1	P11	Green Belt	It is considered that the Green Belt text is in the wrong place, and should instead form part of section 2.2 of the Plan (Strategic Policies). This is because the Green Belt designation is not an environmental designation but is a strategic policy designation. In the first sentence it states that nearly 80% of Runnymede is Green Belt and that only the village centre of Virginia Water is excluded from the Green Belt. This figure was reduced to 74% following the Green Belt releases included as part of the adoption of the Runnymede 2030 Local Plan. In addition, with regards to the neighbourhood area, a number of residential, areas surrounding the centre of the village are not in the Green Belt. This needs to be clarified as it may cause confusion with the Local Centre designation / policy. The second paragraph, under this section, relates to heritage designations / assets as opposed to the Green Belt and as such, appears to be in the wrong place.	Noted, the text has been reorganised in the first few chapters of the NP for clarity	Yes
3.3.4	P12	N/A	In the second sentence in this paragraph the word 'village' should be changed to 'settlement' as Chertsey is not a village.	Noted	Yes
3.5	P13	N/A	It would be useful if the source of this demographic information could be cited.	2021 census	Yes
3.7	P15	Policies SD2/ SL9/ SL10	This section is misleading, as it combines allocated sites (sites 4 and 5) with a site that has received planning permission for development (site 3) and sites that have been included in the SLAA but have not currently been granted planning permission. It is suggested that additional text is added to reflect the planning status of the sites listed.	Noted, changed	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
4.1	P16	N/A	In the last sentence of the first paragraph of this section, it is unclear how the aspiration for the Plan to discourage the village being used as a 'pass through' could be achieved, as it is not possible to restrict where people drive along public roads. This point also applies to the last bullet point in this section.	The Vision has been amended omitting the phrase 'pass through' however, measures to reduce through traffic impact can be achieved through new development so it can remain in the vision	Yes
4.2	P17	N/A	It is unclear what is meant by 'Consolidate our urban form into a clear, legible built edge' in the second bullet point in this section. This should be clarified.	The objectives for the Neighbourhood Plan have been simplified for clarity.	Yes
4.3	P17	N/A	The elements labelled A-D in this section would benefit from an 'introductory paragraph / heading' setting out that they are supporting documents to the Plan, where they can be found etc. There is a typographical error in the second paragraph – 'thought' should be 'though'.	Agreed, text changed	Yes
5 Neighbourhood consultation	P18	N/A	Officers were expecting to see policies here, after reading the text above, and instead have come to a section setting out what neighbourhood consultation has been undertaken. This doesn't seem to fit here and would be better taken out and put into the consultation statement document. To be fully comprehensive as a consultation statement, it would need to set out who was consulted, how this was done, what the main issues raised were, how these issues were considered, and where relevant, addressed in the Neighbourhood Plan. The second paragraph of this section states that the Council was consulted – this is not the view of officers, as there has been little to no contact in relation to the Neighbourhood Plan from the Neighbourhood Forum throughout its development, prior to receiving a copy as part of the Regulation 14 consultation. In the third paragraph in this section, it states that the aim is to ensure that the Plan is 'integrated' with the adjoining Neighbourhood Plans, but it is unclear how this is intended to happen. Please can you set out if any action has been	Agreed, reference to consultation is now in an earlier section of the NP and a full Consultation Statement includes the details of engagement activities	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
			undertaken to do this, and if this is something the other neighbourhood plans want / are willing to engage with.		
5.1	P18/19		Page 18 has a typographical error in the heading 'Consultation Activities' with activities being typed incorrectly. A number of organisations are listed as having been consulted on the Plan, including the Planning Department at the Council (K). As set out above, we consider that very little meaningful consultation has taken place between the Forum and Council. For example, when it came to undertaking the SEA / HRA Scoping exercise, the Council was only provided with an outline of the policies to be included in the Plan (in the form of a PowerPoint presentation), not the Plan itself and with very little detail given. Although this is not a statutory requirement, it does show a lack of engagement, despite repeated requests for a meeting from the Council prior to the Regulation 14 consultation. The Regulation 14 consultation has been the first time that the Council has had a chance to meaningfully engage with the Virginia Water Neighbourhood Plan.	Agreed, reference to consultation is now in an earlier section of the NP and a full Consultation Statement includes the details of engagement activities	Yes
5.2	PP20-22		This section would be better taken out of the Plan and included as part of the accompanying consultation statement.	Agreed, reference to consultation is now in an earlier section of the NP and a full Consultation Statement includes the details of engagement activities	Yes
5.2	P23	N/A	In the penultimate sentence to this section, it states that there has been consultation in relation to open space, accessibility, energy, transport and the core area design with the Council. Was this done with individual teams in the Council? If so, does the Forum have any evidence of this which could be included in the consultation statement? The supporting consultation statement, referred to at the end of this section, is not available on your website.	No direct consultation was made with departments of RBC	Yes
6	PP24-26	N/A	Officers would expect to see this section as part of the consultation statement rather than in the Plan itself.	Noted, however residents would expect to see their	No



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
				concerns published in the NP document.	
6.1	P24	N/A	A number of the issues set out in the bullet points in paragraph 6.1 go beyond the issue of land use planning. It should be made clear in the Plan that although these issues are considered to be locally important, that a number of them cannot be managed / influenced by a Neighbourhood Plan, specifically the 4 th , 5 th and 6 th bullet points in the list, as well as the sentence after the last bullet point.	Agreed, sentence added to text (at 2.8) to explain this	Yes
6.2.1	P24	N/A	For the final sentence of the first paragraph, it would be useful to add a link / direction to where the most up to date Wentworth Estate guidance can be found. It is also currently unclear as to where these guidelines are, as they do not seem to be attached / in an appendix as stated?	Agreed reference added in the NP	Yes
6.2.1	P24		In the paragraph numbered as one under this section it states: 'The Neighbourhood Plan will require planning proposals made within the Wentworth East / Christchurch area to first seek approval from the WERC planning committee before a submission to the Runnymede Borough Council.' The constitution of the Wentworth East Road Committee (WERC) states that "The approval of the Wentworth Estate Roads Committee (WERC) for all works on the Wentworth Estate is in addition to, and independent of, any approval required or not required by Runnymede Borough Council." It is clear from this that these two processes are independent of each other and therefore the Neighbourhood Plan cannot require this to happen, as any decision by the WERC does not impact / affect the Council's planning function. It is unclear if points 1 and 2 of this section are policies or not. This should be clarified.	Agreed that this is unclear, deleted from this section	Yes
6.2.2	P25	N/A	Is there evidence to support the claim that 'The Crown Estate does not wish to add further facilities to encourage more visitors due to the impact adding numbers of visitors has on the park's environment.'? If so, this should be linked / cited.	Confirmed via email	Yes
6.2.3	P25	N/A	For the second bullet point, is this a policy / requirement? If so, it should be included in one / worded / highlighted in a suitable way.	Noted, changed	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
			For the third bullet point (A greater area around the war memorial for meeting and community uses is being requested), the wording at the end of this sentence (e.g., 'is being requested') is somewhat unclear – is there an actual formal request for more spaces being made or is it an aspiration? Who is the request being made by? The Forum via the Plan? If this is the case, then it should be included in a formal policy to help make this clear.		
6.2.5	P26	N/A	Does Figure 11 show the tower as viewed from the Stroude Valley approach, as implied by the first bullet point in this section? If not, the wording here may need to be adjusted. The second bullet point states 'whilst allowing access along the public footpath'. If this is a formal public footpath? If so, then it is not a case of local residents 'allowing' access, it is a right, and the wording should be amended to reflect this. There is a public right of way along Sandy Lane, and if this is the one being referred to here, then that should be reflected in the text.	Agreed, wording changed/deleted	Yes
7 and 7.1	P27		It might be worth considering combining the sentences in 7 and 7.1	This section has been reworked for clarity	Yes
VW.1 Virginia Water Design Code	P28	N/A	Is the Policy 'The Wentworth Estate, East and West' text onwards? It would be useful if this could be clarified.	All the policies have been put into text boxes.	Yes
VW.1 Virginia Water Design Code	P28	N/A	It may also be useful to set out why Trotsworth Avenue and Morello Close are excluded from the Wentworth Estate East designation and included within the Trumps Green area, as this may appear odd to those not familiar with the area. Are they not a part of the Wentworth Estate area (particularly Morello Close which is an enclave within the Wentworth Estate East area)? They appear to lie within the estate boundaries on maps seen by Council officers.	Noted, this can be quite confusing. Text changed (also in Design Code)	Yes
VW.2 Local Gaps	P30	EE14-19.	VW.2 – Local Gaps –This policy seeks to add additional protection to the existing Green Belt policies in the Runnymede 2030 Local Plan (policies EE14-19) in the form of restricting 'visual coalescence'. The Council is not clear how officers would decide whether this requirement was met in considering	Additional text has been added and the policy revised to add clarity.	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
			development proposals within this area. In addition, it is considered that the supporting evidence (see the evidence base section below) appears confused as to whether this policy is advocating a gap or landscape policy, and as to what additional protection is offered, as a result of the inclusion of this policy, beyond that already provided by its Green Belt designation.		
VW.3 Virginia Water Village Centre	P32	IE13 Local Centres	It has been agreed with the Neighbourhood Forum that comments in relation to this policy will be submitted separately as more time is needed to enable Officers to fully internally review and agree the comments made on this policy. These will be provided in a separate Appendix 2 sent at a later date.	Noted	
VW.4 Stroud e Valley Master plan	P34	N/A	It needs to be made clear whether a masterplan has been prepared for this area by the Neighbourhood Forum or if it is a future aspiration for one to be made, as currently it is unclear. If it has been made, it would be useful to know how much involvement there was with the landowner(s) / developer(s) of the area in the production of this masterplan. It is important that this policy takes account of Green Belt policy and doesn't undermine it. For example, the fact that land in the Green Belt is 'unkempt' is of no consequence, as a situation may arise that land was deliberately left in a poor condition in order to realise the lands development potential. It is therefore suggested that this word should be deleted from the first line of the policy.	A Masterplan has not been prepared for this area, it is an aspiration and as such has been moved to a new section.	Yes
VW.5 Trumps Green Shopping Parade	P35	Policy IE14: Shops and parades outside defined centres	The adopted Runnymede 2030 Local Plan - Policy IE14 states: 'Development proposals that enhance the community function of shops and parades located outside centres defined on the Policies Map will be supported.' This is somewhat different to the negative wording in this policy of the Neighbourhood Plan: 'Proposals to change the use of premises in the Parade to a use falling outside Class E will not be supported.' It is suggested that the policy should be reworded to focus on trying to retain active frontages, as opposed to specifically requiring Use Class E uses to bring it into conformity with the NPPF.	Agreed and policy wording changed	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
			Parts A-C appear to be highways issues and not planning ones. Neighbourhood Plans can only deal with land use planning matters, and not highways ones so these may need to be removed. Part E relates to maintenance issues and not planning ones and, as such, should be deleted. The map at the bottom of this policy needs a clearer key. If there is larger / online version of the map, it would be useful to direct / link to this in the associated caption as the annotations on this image are very small. The second paragraph below the map is speculative and it is unclear what it adds to the understanding of this policy. Potential amendments to the GPDO would be unlikely to have any effect on the way this policy works. The Council does not currently have any plans to introduce an Article 4 Direction in this vicinity and for this use. It is therefore recommended that this paragraph should be deleted.		
VW.6 Active Travel	P37	SD3	This policy seems to be going outside land use planning and including transport proposals. Please clarify what involvement Surrey County Council, as the Highways Authority, have had with this policy. For the sixth paragraph below part C, specifying the name of the evidence base document(s) (and where it can be found) would be helpful.	Policy amended taking into account SCC response	Yes
VW.7 Traffic Management		SD3	This policy appears to be going beyond land use planning – e.g. speed restrictions are outside the scope of planning. Also, it seems to be including proposals, such as providing a cycle corridor to Longcross, which go outside the Plan's area and jurisdiction. What involvement have Surrey County Council, as the Highways Authority, have had with this policy? I am not sure how realistic your expectations are, with regards to this section, with regards to the costs needed to bring about the junction and school improvements. Whilst some money will be forthcoming as a result of CIL payments this is unlikely to be sufficient to pay for the costs of the schemes set out in the Plan, particularly when the Plan is not proposing any new development allocations.	Policy amended taking into account SCC response	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
			Part B – The release of Green Belt land at the strategic level is made as part of the Local Plan process and is therefore outside the jurisdiction of a Neighbourhood Plan. The Neighbourhood Plan cannot impose conditions on the preparation of a Local Plan. Paragraph 145 of the National Planning Policy Framework (2023) that addresses Green Belt releases sets out that ‘detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans’. Additionally, developments are already required to make contributions that are necessary to make them acceptable in planning terms, therefore this policy would not add anything in that regard. However, it would be possible to set out in the Plan that monies collected from developments in the Neighbourhood Area should go towards traffic management / highway improvements. This can be a standalone aspiration and does not need (nor can it) be added onto a Very Special Circumstances justification in relation to Green Belt proposals / developments.		
VW.8 Heavy Goods Vehicles			This Policy cannot be delivered as there is no way in which Council officers can compel, require, or monitor an HGV route. In addition, this would not meet the tests for a planning condition, and as such the Council would not be able to add a condition on this to any planning permission, and it should therefore be removed. The associated evidence base (the Virginia Water Transport Strategy) will need to be revised to reflect this. Did the Forum consult with Surrey County Council about these proposals? For the third paragraph, this needs to be more specific to state that this policy can only apply to applications that fall within the Neighbourhood Area. The Neighbourhood Plan cannot have jurisdiction / influence outside of its area.	Policy deleted and added to Aspirations	Yes
VW.9 Virginia Water Green & Blue Infrastructure	P44	EE11 and EE12	Part B – Where it says ‘Development proposals’ at the start of the first sentence it needs to be clarified whether this applies to all developments or is there a size threshold? This policy also needs to have some caveat stating that maintenance or enhancement should only be where this is feasible, or it should allow any losses to be replaced like for like on the same site. The current wording has the potential to cause issues with the Virginia Water North site, due to the extensive nature of the defined network in the area. In the final sentence of this section, woodland planting should clarify if this means more than just trees, or if this	There is no need to clarify a threshold, the policy simply won’t apply in some instances such as minor householder applications.	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
Network			just refers to tree planting. Additionally, it could also specify that 'native' trees etc. should be used. In the fourth paragraph below part C of the policy it is assumed that it is the Policies Map which defines the opportunities, or are there other opportunities not set out on the map? The text currently states: 'The policy defines opportunities to enhance the network and requires all development proposals that lie within, or adjoin the network...' should it be worded 'The policies map' instead at the start of the sentence? It is also assumed the phrase 'opportunities to enhance the network' only refers to the 'enhancement opportunities' on the proposals map, not everything set out on the proposals map? This needs to be clarified. The designation of Whitehall Farm as an 'area of exceptional biodiversity' is somewhat concerning as there does not seem to be any published evidence (that has been submitted to the Council as part of this consultation) to support this? If so, this would need to be published to support this designation, as currently the wording suggests this is simply being done on the basis that 'Residents regularly report' seeing a wide variety of species there. In addition, as the site is in a Minerals Safeguarding Area in the Surrey Minerals Plan, it is possible that Surrey County Council may object to this proposed designation.	Added reference to require native species. The policy has been reworded for clarity. There is no intention to 'designate' Whitehall Farm, it is within the Biodiversity network, wording has been changed.	
VW.10 Net Zero Carbon Building Design	P46	SD7 and SD8	The Council very much supports the inclusion of policies in neighbourhood plans which will help achieve national net zero targets by 2050. Officers respect the efforts of the Forum to take innovative action through the use of neighbourhood plan policy to secure energy efficient, net zero development, but a balanced approach needs to be arrived at which is supported by proportionate evidence demonstrating that housing supply and affordability will not be adversely impacted; and an approach which can be implemented effectively by the Local Planning Authority (LPA) in order to achieve the desired outcomes. Net zero planning policy approaches taken / proposed by much larger authorities operating at larger scales – such as the Greater London Authority (GLA), Bath & North East Somerset Council, Cornwall Council and Central Lincolnshire - will not necessarily work effectively for smaller authorities such as	The concerns are noted regarding the likelihood of this policy not passing examination. The policy requirements as set out have been adjusted as suggested and the text amended to reflect this.	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
			Runnymede, with fewer resources available and with a different local context. These larger authorities have also spent much time at an independent examination satisfying Inspectors that their Local Plan policies will not restrict housing delivery. Since these policies were adopted, the Government has issued a Written Ministerial Statement (WMS) on 'Planning – Local Energy Efficiency Standards Update', published on 13 December 2023. Whilst a WMS is not law, it is a powerful material consideration – if an approach is being pursued that departs from a WMS, there would need to be a strong evidential case to support it. The Council therefore sets out below some alternative approaches that could be adopted which strive to balance the aspirations of the local community to achieve net zero, with the principles set out in national policy and guidance (including the WMS) and the resources available to the LPA to implement the proposed policy requirements. The following policy approaches are also more likely to be supported at examination, given the lack of viability assessment and other evidence (such as carbon emissions trajectories) to justify the introduction of stronger policy requirements. Clause A seeks proposals to be 'zero carbon ready' by design, which the supporting text defines as 'making spatial decisions on layout and orientation of buildings at the outset to maximise passive design benefits of a site'. This definition may be confusing to readers of the Plan, as the Government is currently referring to 'zero carbon ready' in their Future Homes and Building Standards consultation as a building built to high energy efficiency standards which will decarbonise over time alongside the electricity grid without any future energy efficiency retrofit work. In any case, this requirement duplicates criteria c) of policy SD7 in the Runnymede 2030 Local Plan which states that development proposals will be supported where they maximise opportunities for passive solar gain and passive cooling through the orientation and layout of development. If the Forum would like to repeat the requirement in the Neighbourhood Plan (perhaps reflecting the criteria in policy SD7 for consistency), a useful addition could be to specify that major development proposals need to demonstrate how this has been addressed in the Energy Statement submitted with a planning application, as this is not currently		



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			stressed in criteria c) of policy SD7. Policy SD8 requires major development proposals to submit an Energy Statement demonstrating how the energy hierarchy has been achieved – passive design should be considered at stage 1 of the hierarchy. Further comments on the content of an Energy Statement are provided below (with reference to Clause E). The supporting text for Clause A refers to the Council's 'Net Zero Carbon Toolkit 2021', but RBC does not currently operate such a toolkit. RBC will be adopting a Net Zero Carbon Toolkit this Spring, which will be an adapted version of the Cotswold District Council toolkit. The supporting text could be amended to refer to the principles in this emerging toolkit, which promote fabric-first principles and energy use intensity targets, and performance standards equivalent to that of a Passivhaus home. However, the toolkit will not be adopted as a planning policy document – it is being adopted as guidance for developers on how to achieve net zero carbon operational standards beyond that of the Runnymede 2030 Local Plan. The WMS referred to above is clear that energy metrics which are different to those of Building Regulations will not be supported unless evidence is provided to justify their adoption. Officers do agree with the supporting text which says energy performance should be considered early in the design process and not be left until the Building Regulations stage. Clause B seeks the submission of a post-occupancy evaluation report at discharge of condition stage. Officers support the aspirations of the Forum to address the performance gap but have some concerns about the impact of this policy on housing delivery, and the capacity of the Development Management team to monitor the requirement and ensure it is implemented effectively. To be implemented effectively in London, the GLA has produced detailed guidance and templates (e.g. for s106 agreements). Whilst the Forum has produced guidance to support implementation (although this refers to Buckinghamshire Council rather than Runnymede), further clarity would be needed to ensure successful implementation. Feedback from similar schemes is that additional expertise needs to be commissioned to ensure the		



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			requirements are met – whilst the Forum has said cost impacts are likely to be minimal, no evidence has been provided to support this statement. Officers recommend a simpler mechanism is adopted which is more capable of being rolled out at scale and which is non-intrusive for occupants: for example, sections 8.1-8.2 of the Future Homes and Buildings Standard consultation (FHBS) puts forward options to assess real-world performance of homes (preferably using a Smart Meter Enabled Thermal Efficiency Rating, anticipating that most new homes will be fitted with smart meters). The Neighbourhood Plan could advocate the use of such methods until they are introduced as part of the FHBS in 2025, at which point they will be monitored through the Building Control regime. This would provide greater consistency with future, national plans for monitoring post-occupancy performance. If the Forum chooses to retain the policy as it is, evidence suggests that only a portion of new development needs be monitored e.g. 20% of dwellings and 90% of common spaces (this is taken from the evidence base used to support the development of Old Oak and Park Royal Development Corporation's Local Plan). In the absence of a viability assessment to justify the introduction of the proposed post-occupancy requirement in the Neighbourhood Plan, officers would recommend the policy requirement is softened and amended to allow some flexibility in application of the policy – an example is provided below, but with additional text in square brackets to reflect intentions for future Building Regulations: <i>Solihull Local Plan Policy P9: "For all major developments, implement a recognised quality regime 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]".</i> Clause C states that buildings should be certified to a Passivhaus or equivalent standard where feasible. The encouragement of such a standard is supported, and the supporting text clearly sets out how achievement of the standard can be demonstrated. It should be noted that unless viability evidence is submitted to justify the introduction of the standard as a policy requirement,		



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			the LPA will not be able to enforce compliance but rather encourage developers to consider the feasibility of achieving it. Supporting text could also signpost readers to the Council's emerging Net Zero Carbon Toolkit which provides more detail about achieving such a standard. The toolkit makes reference to energy performance targets, including the space heating demand of less than 15kWh/m²/year, but this is considered to be a 'gold standard' and may be challenging to achieve in most development schemes. The language around impacts on heritage assets also needs to be reconsidered to conform with strategic heritage policies in the Runnymede 2030 Local Plan, and with national policy and guidance. Planning applications for energy efficiency / net zero measures will need to comply with policies EE3-EE8 of the Runnymede 2030 Local Plan, which generally seek to conserve and enhance existing heritage assets within the Borough. Even less-than-substantial harm to a Conservation Area or listed building setting will be given considerable weight in decision-making. For any heritage asset, improvements in energy efficiency of that asset should be consistent with the conservation of the asset's significance (including its setting) and be in accordance with national and local policies for conserving and enhancing the historic environment. Reference to Historic England's guidance may be useful for applicants: Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency Historic England. This provides further guidance on avoiding harm to the historic environment and implementing energy efficiency measures to address the climate emergency. Clause D seeks the submission of a Whole Life-Cycle Carbon Emission Assessment (WLCA). Officers recognise that embodied carbon is becoming increasingly important to address, however, requiring the submission of a WLCA is a significant undertaking for developers – the GLA has again produced extensive guidance and templates to guide the implementation of this requirement, as there are many factors to consider to ensure effective implementation and assessment at planning application stage. The requirement only applies to 'large-scale' major developments, and Bath and North East Somerset's Local Plan update also applies a similar policy to 'large scale new-build developments' only (i.e. a minimum of 50 dwellings or a		



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			minimum of 5,000sqm of commercial floorspace). Precise embodied carbon emissions targets are also cited to provide clarity to developers and Development Management officers about performance targets which are deemed acceptable. Robust evidence was required for both plans at examination to satisfy the Inspector that the standards were justified and would not threaten deliverability or viability of housing development. Other evidence indicates that the licence costs of full WLCA software alone can be in the region of £3,000 per year. In the absence of a viability assessment to support the policy requirements of the Neighbourhood Plan, a less stretching requirement could be more appropriate, and the supporting text could support more limited assessments such as UKGBC's One Click LCA Planetary Tool, which covers modules A1-A5 of the RICs methodology but can be used as a free tool to assess the impact of key construction materials. After their viability evidence indicated that the cost implications of net zero policy options would impact housing delivery, Guildford Borough Council has taken the following approach in policy D14 of their Development Management Policies Local Plan: 'Development proposals are required to demonstrate that embodied carbon emissions have been minimised by: a) sourcing materials locally where possible; and b) taking into account the embodied carbon emissions of materials based on information provided in a respected materials rating database. Proposals for major development are required 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'. Detailed guidance is provided in the supporting text to policy D14. A paragraph of the supporting text states 'In the absence of any current adopted or saved Local Plan policy covering the energy performance of new buildings...'. This is incorrect. Policy SD8 requires major development proposals to apply the energy hierarchy, as evidenced in an Energy Statement. This means that new development must achieve Part L Building Regulations energy performance standards, but proposals should focus on using less energy in the first instance (and therefore focus on achieving high fabric efficiency standards		



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			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. Perhaps the paragraph should instead refer to the absence of an embodied carbon policy in the Local Plan, which would be correct. The last sentence of the paragraph also refers to a 'districtwide' requirement, but Runnymede is a borough. Finally, Clause E sets out that all proposals except householder applications must submit an Energy Statement. This is not in general conformity with the Runnymede 2030 Local Plan, a Basic Condition which must be met if the NP is to be recommended for Referendum, which requires this of major development proposals only. Evidence submitted should be proportionate to the nature and scale of development – perhaps the Neighbourhood Plan could expect smaller proposals to outline their approach as part of the Planning Statement. The supporting text sets out what an Energy Statement should cover, but many of these are unreasonable given they are not policy requirements, and are not underpinned with evidence to justify their introduction, including: • Minimisation of unregulated emissions (outside the scope of Building Regulations); • Embodied carbon emissions; • The need to reduce carbon emissions through energy efficiency beyond that of Building Regulations; • A passive design capacity assessment, when the Passivhaus or equivalent standard in Clause C is encouraged rather than required. Or does the passive design capacity assessment demonstrate how proposals have met the requirements of Clause A, to demonstrate how passive design has been considered? Officers agree that every new / redevelopment proposal has an opportunity to contribute towards net zero objectives, but the requirements of policy VW.10 will be very onerous for certain types and scale of development; are not		



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			supported by evidence to justify their introduction; and lack clarity and consistency. For example, the supporting text sets out how the Energy Statement must demonstrate how proposals reduce carbon emissions beyond that of Building Regulations, but there is no requirement within the policy itself which mandates this – only an encouragement to meet Passivhaus standards where feasible.		
VW.11 Community Infrastructure	P49	SD6	There are several facilities included in your list that we do not consider to be community facilities such as the Merlewood Care Home, Signature Care Home and McCarthy Stone Retirement Living, which are be private residential accommodation / institutions. These should be deleted from this policy. For the first bullet point under the list of facilities it is suggested that a time limit is added for the marketing period, to better align with Local Plan policy (e.g. SD6 where the requirement is for six months). Without a limit, it could be argued that this period would be indefinite, and thus be hard for applicants to prove they have used ‘all reasonable efforts’, which is itself a very vague term.	Agreed, removed. Added a period of a year, 6 months is a very short time to market a property.	Yes
8.2	P52		For the text that states ‘Within the Officer Report, the following are recommended for inclusion within a S106:’ – it is assumed that this reference relates to the allocation for Policy SL10 – Virginia Water South, and it is recommended that this is clarified. However, the text below this (in italics), is not considered to meet the legal tests of being directly related to the development site (if this is Virginia Water South) in that some of the requested highway improvements are quite distant from this (and other) allocations in Virginia Water. For example, the junction of Trumps Green Road and Crown Road is circa 1km to the north east of the Virginia Water South allocation. Outline planning permission has already been granted (under RU.22/0278) for part of the Virginia Water South (on 15/02/2023) and the subsequent reserved matters application under RU.23/1061 is currently being considered by the Council. Policy SL10 allows the developer to set out in their Travel Plan and Transport Assessment measures to improve pedestrian access but it is unlikely that a requirement as specific as the one set out in the paragraph below the italics (‘Therefore, at the point of the 10 th dwelling at VWS being occupied, an upgraded pedestrian crossing infrastructure over Trumps Green Road at the	Noted, text removed	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment	Response	Change to NP?
			junction with Crown Road should be created.')		
			would be included as part of a Reserved Matter condition / s.106 agreement. In addition, the Council is in receipt of the reserved matters application for this part of the site (RU.23/1061) and so it is likely that this application (including any associated s.106 agreement) could be determined prior to the adoption of the Neighbourhood Plan. Therefore, it is recommended that this text relating to VWS is removed.		
8.2	P53		The bullet points under 'Key considerations' appear to be highways issues / improvements, so largely fall outside the remit of planning. Has any viability work been undertaken to cost any of these proposals? The seventh bullet point includes the statement that "Both RBC and SCC have indicated that after the internal socialisation of the Plan [we are not sure what this means] they have no fundamental objections to its aspirations..." Please can you confirm what this statement means and who at the Council you consulted on this issue as officers are not aware that we had given a view one way or another.	This section is for aspirations, so they can be any aspirations that the Forum have, including those which are not specifically related to planning applications.	Yes
9	P54		For the sentence 'Both Great Fosters Hotel and the Holloway Sanatorium are the only Grade I buildings that remain in Virginia Water:- have any Grade I buildings been lost? if not then this wording would need to be adjusted.	Text removed	Yes
9.4	P57		The wording in the first sentence needs adjustment.	Noted	



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
Maps	N/A	Multiple	A large number of the maps associated with the Plan are difficult to read and use, and nearly all of them could do with adjustments / improvements (more detail on this for each map is set out below). New maps, at suitably zoomed-in scales will need to be provided to make the associated policies useable by those looking to use the Plan. The Forum will also want to consider using different base layers, styling etc. to help make each map more useable, and the Topo layer used is not suitable in all cases, and often provides far more detail than is required for the topic / subject of the map, making it more difficult to read.	Noted	Map changed
VW.1 Design Code Inset Policies Map	VW.1 Design Code Inset Policies Map	N/A	There are a large number of designations on this one map which makes it hard to read, particularly for areas such as the village centre which have a lot of different policies / designations. It might be worth exploring splitting this into two, with perhaps all the traffic-related designations on one, and the other designations on the other. This may take some time / experimentation to make it work. Policy VW1: 'A Spatial Strategy for the Village' – this designation could use a thinner line to make it obscure less of the map detail. The Wentworth Estate West and Crown Estate stylisations are very similar which makes it hard to tell which areas they cover. Existing Cycle Routes and Speed Limit reduction 30mph to 20mph look very similar, particularly when looked at on a busy map with a lot of layers showing.	Noted	Map changed



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
VW.2 Local Gap Map	VW.2 Local Gap Map	N/A	Policy VW.2 in the Plan refers to: 'The Neighbourhood Plan defines the following Local Gaps on the Policies Map for the spatial purpose of preventing the visual coalescence with surrounding settlements (see Figure 13): A. Virginia Water and Englefield Green B. Virginia Water and Egham' However there do not appear to be two areas, A and B labelled on the map. Is the Gap policy covering one area or two? Either this needs to be re-worded, or two areas shown on the relevant maps to reflect areas A and B referred to above.	Noted, there is one area	Map changed
VW.3 Village Centre Map	VW.3 Village Centre Map	N/A	This map needs to be zoomed in to a suitable degree to make the detail of the area it covers clearer. Currently this map is not helpful as it too far out (scale wise) and this will hinder the interpretation of this policy.	Noted, map changed and area changed	Yes, map changed
VW.5 Shopping Parade Trumps Green Map	VW.5 Shopping Parade Trumps Green Map	N/A	This map needs to be zoomed in to a suitable degree to make the detail of the area it covers clearer. Currently this map is not helpful as it too far out (scale wise) and this will hinder the interpretation of this policy.	Noted	Map changed
VW.6 Active Travel Map	VW.6 Active Travel Map	N/A	Due to the high level of detail resulting from the use of the Topo Base layer for this map, the purple line for Existing Cycle Routes is hard to see at times / at certain locations. The use of a blue line style for Public Rights of Way may cause confusion as people may think / associate it with waterways.	Noted	Yes
VW.7 Traffic Management Map	VW.7 Traffic Management Map	N/A	The Area Improvements style looks very similar to the waterbodies shown on the map. Changing the colours of this or including a fill style / border to this designation would make it easier to discern.	Noted	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
VW.8 Heavy Good Vehicles Map	VW.8 Heavy Good Vehicles Map	N/A	The route for Longcross should be removed from this map, as Longcross lies outside of the Neighbourhood Area, and thus policies for this area cannot be made by the VWNP.	Noted	Map removed
VW.9 Green and Blue Infrastructure Map	VW.9 Green and Blue Infrastructure Map	N/A	The stylisation for Thames Valley - Windsor Great Park Biodiversity Opportunity Area (BOA), Thames Basin Heaths - Chobham Common North & Wentworth Heaths BOA and Public Rights of Way look too similar to watercourses. Many of the line stylisations are shown as solid lines in the key, but on the maps are shown as dots / dashes. This inconsistency may cause confusion. The lines for Existing Cycle Routes, Public Rights of Way and Bridleways appear to be much thinner in the key than they appear on the map. This also makes the colours (particularly for Existing Cycle Routes) hard to distinguish. The green layer over the Windsor Forest & Great Park Site of Special Scientific Interest, makes it looks similar to Allotments & Community Growing Spaces in the key. Windsor Forest & Great Park Special Area of Conservation does not appear on the map. Is this because this layer is overlaid by the Windsor Great Park (Public Park) layer? If so, a different fill style etc. may be required for one of the layers. Under the Amenity Greenspaces heading in the key, should 9. Coronation Playing Field and 7. Cabrera Avenue Playing Fields be switched round in the order they appear?	Noted, map changed	Yes



Evidence base documents

Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
Community Infrastructure	N/A	N/A	Some of the facilities that have been included in this document are a form of housing and are not community facilities / infrastructure. These uses should be deleted from this document and include: • Merlewood Care Home • Signature Care Home • McCarthy Stone Retirement Living		
Cycling and Walking Review	N/A	N/A	This document focuses solely on highways issues and seeks highway improvements as part of its recommendations. This is not relevant for planning policy / neighbourhood plans. This document seems to be very similar to the Local Centre and Wider Connections Study, except that it seems to give recommendations for specific changes to each identified location, whereas the aforementioned study sets them out in general terms. Longcross lies outside of the Neighbourhood Plan area and should therefore be excluded from consideration as the Plan cannot influence sites outside of its designation. Therefore, this document should be revised to reflect this.		
Design Code	N/A	N/A	It has been agreed with the Neighbourhood Forum that comments in relation to this element of the Neighbourhood Plan will be submitted separately as more time is needed to enable Officers to fully internally review and agree the comments made. These will be provided in a separate Appendix 2 sent at a later date.		
Local Gap Study	N/A	N/A	It is unclear what this policy and evidence document add, in terms of additional protection, considering that the area covered by the proposed designation is also covered by the Metropolitan Green Belt (see paragraph 4.8), which is a spatial planning designation whose aim is to ensure that gaps between settlements are maintained.		

Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
			Paragraphs 4.28 and 4.29 do not seem to make sense. Although the loss of woodland might make the settlements more visible to / from each other, this would not increase 'visual coalescence' as open land can provide a visual gap between settlements, regardless of whether there is woodland on it or not. In addition, the claim that 'scattered relatively small-scale development with component elements above tree height, such as communication masts, pylons etc... would compromise the area's landscape ability to prevent coalescence of settlements' does not make sense, as a pylon / mast does not represent significant built form that would give the impression that two places have merged into each other. Electricity pylons are a relatively common feature in the countryside and do not automatically represent the merging of settlements, any more than roads between places do. In addition to the above, paragraph 5.1 discusses various characteristics of the area, none of which relate to the purposes of Policy VW.2, in that this policy seeks to retain a gap between settlements. It therefore brings into question the basis / link between the assessment criteria of the evidence used to support the proposed designation of the area, and the objective of the policy it seeks to support. Further to this, paragraph 5.2 states that the Green Belt provides 'a degree of protection' and that the Gap policy would provide further protection, but it is unclear how this policy adds any additional protection to that of Green Belt, beyond attempting to stop the removal of vegetation (which can be done without planning permission, provided there are no TPOs etc.), and seeking to restrict the development of tall structures such as pylons / communication masts, many of which can be built under permitted development rights. Paragraph 5.7 states 'Adoption of a Local Gap policy would effectively supplement and reinforce the existing Green Belt policy covering the study area'. Though it is unclear how it actually does this, as it does not appear to offer any additional		



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			protection beyond that already offered by the Green Belt designation. It appears more as duplication, which neighbourhood plans are not supposed to do in relation to either National or Local Plan policy.		
Local Centre and Wider Connections Study	N/A	N/A	This document focuses solely on highways issues and seeks highway improvements as part of its recommendations. This is not relevant for planning policy / neighbourhood plans. Longcross lies outside of the Neighbourhood Area and thus should be excluded from consideration as the Plan cannot influence / plan for sites outside of its borders. Therefore, this document should be revised to reflect this. In addition, it appears that the eastern extent of the Local Centre boundary has been drawn to include the junction of Christchurch Road / Trumps Green Road / Stroude Road to include a recommendation to adjust traffic light signal timings to enhance pedestrian access. If this is the case, as this is a highways issue, this would not be a sufficient justification to draw the boundary of the Local Centre, and this boundary would need to be re-drawn to more accurately reflect the Local Centre based on planning, not highways issues. The maps provided also lack sufficient detail / key information, such as Figure 22, where it is not clear what the red and blue boundary lines represent. These need to be improved to make the maps understandable.		
Post-Occupancy Evaluation Guidance	N/A	N/A	See the comments made in relation to Policy VW.10 in the table above.		
Emerging Transport Strategy	N/A	N/A	A significant proportion of this document sets out a series of traffic related data (pages 7-20), which follows on from a context section. The section that relates to measures to civilise traffic (pages 21-26) are Highways measures that would need to be implemented by Surrey County Council. They are not controlled by land use		

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			planning, and it is not relevant for inclusion in the Neighbourhood Plan. The planning applications for Longcross are not within the Neighbourhood Area, and thus are not within the remit of the Neighbourhood Plan. This should therefore be removed from the document. On page 27 it states that 'A Framework Construction Traffic Management Plan was included as a chapter within the Transport Assessment for Virginia Water South, prepared by i-Transport and dated February 2022.'. This document was a background evidence document that accompanied the application (presumed to be RU.22/0278). It would be useful if a link to this document could be provided in the Plan. Several of the measures set out on page 34, e.g. Driver Information Packs, a Workforce Travel Plan, RFID and ANPR are outside the Council's remit and cannot be required for development sites. The Forum may need to discuss this issue with Surrey County Council.		
Walking and Cycling Review	N/A	N/A	Longcross lies outside of the Neighbourhood Area and thus does not fall within its jurisdiction. Discussion / projects / recommendations in relation to this site (e.g. section 3.2) should therefore be removed from the document. This document discusses / recommends a series of highway improvements which are not planning, but Highways matters. These fall outside the jurisdiction of Neighbourhood Plans.		
VW.3 Virginia Water Village Centre	P32	IE13 Local Centres	Part A - the proposed boundary for the centre is different to that set out in the adopted Runnymede Local Plan and includes the eastern side of the railway line along Christchurch Road. This area doesn't appear to cover any buildings, and just some of the road itself and the verges fronting onto Virginia Park. It is not clear why this area is included and what the justification for its inclusion is. Part B – this requirement is quite negatively worded. For example, it states 'amenity of existing residential uses is not	Agreed, the centre boundary has been amended to be the same as the Local	Yes



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
			negatively impacted upon and that the potential for statutory nuisance is avoided'. However, it does not say explicitly whether this should be grounds for a refusal or not, and this needs to be clarified. In addition, the text in relation to “statutory nuisance” should be amended to ‘impact on amenity’ in line with Policy EE2 of the adopted Runnymede 2030 Local Plan. This is because ‘statutory nuisance’ lies outside of the planning system (as this is an Environmental Health issue) and thus reference should be made to Policy EE2 as this refers to amenity (which does fall within the remit of planning). Part C – the change of use to an office use is already permitted under Use Class E for most local centre uses, so it is unlikely that this element of the policy is capable of being implemented except in quite limited circumstances (see Use Classes - Change of use - Planning Portal). Part D – The restriction to not allow any more than three storeys in height is unduly prescriptive, given that Hannover House and Imperial House, sited directly to the west of the train station, are already 4/5 storeys. What is the justification for this restriction? Part E – It would be useful to know what (if any) input there has been from Surrey County Council as the Highways Authority on this requirement. The map at the bottom of this policy needs a key. Is there is larger / online version of the map? If so, it would be useful to provide a direct / link to this in the associated caption as the annotations on this image are very small.	Plan boundary. The policy has been reworked to take account of the issues raised. New map also included.	
Design Code			There appears to be a real lack of understanding that Green Belt policy is about urban containment. Instead, it would appear that the drafting has sought to hang a number of environmental arguments onto the Green Belt status. Therefore, from the onset there is a lack of credibility over some of the proposed requirements set out within the Design Codes. This also	Noted, the Design Code has been extensively rewritten.	Yes, the relevant policy and preamble have been rewritten to reflect the amended Design Code.



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
			highlights the lack of contextual analysis in some of the Design Code parameters. In addition, the consideration about the impact on openness of the Green Belt has not fully considered the correct assessment which has been established through case law. Case law is clear that openness is an open textured assessment based on both spoil and visual harm and it is unclear how this Design Code is seeking to accord with this. Instead, it is seeking to justify height parameters without any justification for it. Much of the parameters set out within the Design Codes lack any real clear design led justification. For instance, there appears to be no contextual assessment which has led to the proposed parameters set out within the Design Codes. The Plan also appears to be trying to limit or prevent the scope of what extent development can take place i.e., trying to restrict how many properties can come forward in character areas which are in the urban area. There also appears to be a true lack of recognition that some of the matters they are seeking to restrict - and these design codes are about restrictions not about informing good design - fail to consider that much of the matters either do not sit within the remit of planning or in many instances do not require planning permission. I have set out below some more specific comments about different elements of the Design Code. A13 (in general) - The design objectives are seeking to go above and beyond Green Belt policy and seek to embed them as some form of design criteria with no clear narrative to the design led justification. A13 Guideline ii) 'Proposals must not result in a ridge height over a garage or a single storey that exceeds 6.5m' – it is unclear what is meant by 'a ridge height over a garage'. Does this mean that garages and ridge heights cannot be more than 6.5m high?		

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			A13 iv) – does this need a slight addition at the end to make it clear there is support for these types of design in that case? A14 i) and ii) – The design objectives are seeking to go above and beyond Green Belt policy and seek to embed them as some form of design criteria with no clear narrative to the design led justification. A15 iii) – this seems unduly prescriptive and negative, effectively banning solar panels on roof slopes fronting onto roads. It appears to be trying to override something which can be done without the need for planning permission and trying to limit something on design grounds without a clear justification. A17 – there is a lack of evidence to justify such an approach and fails to consider a fall-back position of what can be done without the need for planning permission. A18 (general) – loss of trees policies lacks any clear justification. Additionally, trying to link ‘green objectives’ to an urban sprawl policy lacks a credible design-led strategy. A18 ii) – this is a disproportionate requirement as currently worded for a planning application and thus any applications should include a tree survey to justify its loss instead of a blanket ban. A18 iii) – this unduly burdensome and there appears to be a lack of justification for this. A20 (general) – there is a lack of credible design-led justification for the proposed development parameters. The wording is ambiguous, e.g. what does the 22% relate to (e.g. hardstanding as well as enclosed built form?), and by the distance boundaries, does this mean to side boundaries to create spacing? A23 (general) – is there a design justification on highways grounds? Does this consider that on most roads a new access does not require planning permission? A23 ii) – this is excessively specific / prescriptive and lacks justification, unless there are highway safety issues (which are		



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
			the grounds for refusing an access point) this would not be enforceable. A23 iii) it is not clear what is meant by an 'approved specification'? A24 (general) – the Council's adopted Design SPD sets out the 22m separation distance, so this is unnecessary duplication? There is a lack of a justification for the policy on nuisance from ancillary buildings. It is not for planning to replicate statutory nuisance issues. Remove the reference to Wentworth Estate from covenants as this is not relevant to planning. A24 iv) – as this relates to development permitted under the GPDO it is not possible to add additional criteria onto something that is already Permitted Development. A25 i)-iii) - where planning permission is required in the Green Belt fences, gates etc are inappropriate development in the Green Belt. A25 vii) - security cameras are not usually development requiring planning permission and thus a policy that relates specifically to them is not appropriate. B12 i) is this too negative and essentially stops additional development / dwelling provision. B13 Guideline ii) 'Proposals must not result in a ridge height over a garage or a single storey that exceeds 6.5m' – it is unclear what is meant by 'a ridge height over a garage'. Does this mean that garages and ridge heights cannot be more than 6.5m high? This is considered to be overly prescriptive. B13 iv) – does this need a slight addition at the end to make it clear there is support for these types of design in that case? B14 i) and ii) – The design objectives are seeking to go above and beyond Green Belt policy and seek to embed them as some form of design criteria with no clear narrative to the design led justification.		



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
			B15 ii) – this seems unduly prescriptive and negative, effectively banning solar panels on roof slopes fronting onto roads. It appears to be trying to override something which can be done without the need for planning permission and trying to limit something on design grounds without clear justification. B15 iii) – the requirement for prefabricated construction and no use of brick / block is overly prescriptive. Planning can prescribe / set / restrict the type of construction method used. B17 – there is a lack of evidence to justify such an approach and fails to consider a fall-back position of what can be done without the need for planning permission. B18 (general) – loss of trees policies lacks any clear justification. Additionally, trying to link ‘green objectives’ to an urban sprawl policy lacks a credible design-led strategy. B18 ii) – this is a disproportionate requirement as currently worded for a planning application and thus any applications should include a tree survey to justify its loss instead of a blanket ban. B18 iii) – this unduly burdensome and there appears to be a lack of justification for this. B23 ii) – this is excessively specific / prescriptive and lacks justification, unless there are highway safety issues (which are the grounds for refusing an access point) this would not be enforceable. B23 iii) it is not clear what is meant by an ‘approved specification’? B24 iv) – as this relates to development permitted under the GPDO it not possible to add additional criteria onto something that is already Permitted Development. C7 iii) – this building is already a Statutorily Listed building and thus is already protected. C14 – This overly prescriptive and lacks justification.		

Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
			C17 – there is a lack of evidence to justify such an approach and fails to consider a fall-back position of what can be done without the need for planning permission. D12 i) this too negative and essentially stops additional development / dwelling provision. D13 i) – viii) only allowing detached / semi-detached / bungalows is overly prescriptive and lacks justification. D14 i) - this is overly prescriptive and lacks justification. D14 ii) – there no policy for this so this word should not be used. Wording could be used to support developments that responds to the character of the area instead. D17 – there is a lack of evidence to justify such an approach and fails to consider a fall-back position of what can be done without the need for planning permission. E7 ii) – v) – is the Neighbourhood Plan seeking to designate these buildings as Locally Listed Buildings (it refers here to buildings as a ‘local heritage asset’)? If so, there is a proforma that the Council has used previously to assess buildings for potential designation as a Locally Listed Building (as The Rose and Olive already is, which is listed in part i) of E7) which would be a good way assess these properties – we are happy to provide this if this is what the Neighbourhood Plan is seeking to achieve. These could also be designated as part of the Neighbourhood Plan and added to the Local List if they are suitable. F13 ii) – the current wording is not in accordance with the NPPF and Local Plan in regard to making efficient use of previously developed land. There is no justification to limit a design strategy to be of a subservient form and scale to the existing buildings. What the policy could do is set out that any design strategy should justify its form and scale based on the existing character of the area. F14 i) and ii) – as above for F13 ii).		



Section	Reference/ page	Relevant Local Plan / NPPF policy(ies)	Comment		
			G13 i) and ii) – this is overly restrictive in terms of the type and style of homes that can be developed here and there is no design-led justification for this. G14 - this is overly restrictive in terms of the type and style of homes that can be developed here and there is no design-led justification for this. G17 i) – overly prescriptive and there is already a wide mix of uses in the area which would be restricted if this policy were implemented.		



APPENDIX C – Surrey County Council

Section	Reference/ page	Comment	Response	Change to NP?
General	Flood risk	We would recommend that reference is made to Sustainable Drainage Systems (SuDS). The integration of SuDS in developments not only contributes to a reduction in surface water flood risk but can make spaces more resilient in other ways such as cooling in the summer, improving air quality, biodiversity and water quality. We would also suggest that the document refers to the mapped surface water flood risk that exists within the area and the opportunities created through development to better manage and reduce this risk. The Neighbourhood Plan provides the opportunity through development to reduce surface water flood risk and this should be included within the document. Section 3.3.4 on waterways acknowledges fluvial flood risk, but there is no consideration to surface water flood risk. This section should also include a reference to Ordinary Watercourses. An Ordinary Watercourse is any river, stream, brook, ditch, drain, culvert, pipe and any other passage through which water may flow which is not designated as Main River. It does not have to be recorded on a map to be an ordinary watercourse and commonly is not. This section should refer to the consent process required for any changes to ordinary watercourses and riparian responsibilities. See our SCC links: Ordinary watercourse consents - Surrey County Council (surreycc.gov.uk) Living next to a watercourse - your rights and responsibilities - Surrey County Council (surreycc.gov.uk). Section 4.2 on objectives includes 'Encourage development based on sustainability' linked to Runnymede 2030 Local plan policy SD7. However, this policy does not include sustainable drainage systems. We would recommend that the use of SuDS is listed as one of the objectives and where practicable is included within all new developments. Section 2.3 on sustainable development should make reference to the use of SuDS and the associated benefits. In section 6.2 to address the key issues in each neighbourhood, consideration should be given to retrofitting and the inclusion of sustainable drainage systems into existing developed areas which will offer multi-functional benefits. Where changes are being made to existing infrastructure there should always be consideration of opportunities to integrate SuDS.	The NP does not cover this issue as it is considered that SUDs is covered by National and Local Planning Guidance	No
General	Ecology	We would recommend that reference is made to Biodiversity Net Gain (BNG) which became a "legal requirement to most 'major' developments from 12th February 2024, and is due to come into force for other smaller developments from 2nd April 2024" which is enforced by the Environment Act 2021. We would also recommend that the document refers to the Local Nature Recovery Strategy (LNRS) (emerging) for Surrey. As responsible authority for the LNRS, SCC seeks the Virginia Water Neighbourhood Forum's support for protecting and enhancing biodiversity through the Neighbourhood Plan. A requirement of the Environment Act 2021 is the production of a LNRS in a collaborative and evidence-based manner and the engagement process for this	Noted, however BNG is a statutory requirement which will be managed by Runnymede Borough Council in response to planning	Yes

Section	Reference/ page	Comment	Response	Change to NP?
		commenced in 2023, with the aim to complete the strategy by 2024. We would welcome Virginia Water's involvement in this process to ensure local opportunities for nature recovery are identified and linked into a network for greater ecological resilience. In Section 3.3.2 on biodiversity, we recommend referring to Chobham Common as Lowland Heathland rather than coniferous heathland as this better represents the special habitat on site. Additionally, it would be worth mentioning that it is the largest National Nature Reserve (NNR) in the southeast of England, is part of the Thames Basin Heaths Special Protection Area (SPA) and also part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC). At present no objectives/aims in Section 4.2 refer to biodiversity. We would recommend creating an aim such as 'Development proposals should align with and contribute to the delivery of the Local Nature Recovery Strategy (emerging), to maximise nature recovery in the local area' and 'Development proposals should produce a positive net gain of at least 10% biodiversity'. We would suggest considering the inclusion of a policy which refers to Delivering a Net Gain for Biodiversity and supporting the implementation of the Local Nature Recovery Strategy. This could link with Policy VW.9 Virginia Water Green and Blue Infrastructure Network and therefore Policy EE9 Biodiversity, Geodiversity and Nature Conservation of the Runnymede 2030 Local Plan. We recommend adding in a sentence to Policy VW.9 stating planting requirements of using native species and/or climate resilient species, particularly in section B.	applications and the LNRS is not yet in place. Two sentences have been added at Section 5 to reflect these issues. Sentence on Chobham Common added. Reference to native and climate resilient species added to VW9	
Transport		We support the commitment to reduce traffic in the area and improve pedestrian and cycle links and recognise that this aligns with the ambitions of Surrey's Local Transport Plan (LTP4). We support the references to the improved pedestrian and cycle environment, particularly those that connect to the existing identified LCWIP routes. A phase 1 cycle route connecting Egham to Virginia Water is currently in feasibility design stage and will be consulted on in the coming year. Other routes will be progressed following this and connect into the routes shown in the plan. We also support the references to add greening and seating to areas such as Trumps Green parade, to be designed in line with Surrey's Healthy Streets design guide. The Neighbourhood Plan must be compliant with Healthy Streets for Surrey, which is the county's street design policy adopted in 2022 and now presented as a webtool. Its contents must be integrated into any design code included in the Neighbourhood Plan for new developments and street retrofit/ redevelopment situations. In Surrey, we want streets that are welcoming, safe and attractive for all to access and enjoy. Our Healthy Streets for Surrey raises the standard of street design, creating streets which are	Noted, text added.	Yes



Section	Reference/ page	Comment	Response	Change to NP?
		safe, green, beautiful, and resilient in line with the ambitions of the Community Vision for Surrey 2030. It includes national and local guidance and policies and is presented as: ▪ 'Musts' (mandatory requirements) ▪ 'Shoulds' (requirements that require justification to deviate from) ▪ 'Coulds' (recommendations for street design in Surrey) This will be supported by the Local Street Improvements programme being undertaken by SCC which looks to emphasise the importance of streets and places for people and not just their importance for the movement of vehicles. The measures used will depend on the context of the area and stakeholder support but could include greening, safer and more accessible cycling and walking infrastructure such as widened pavements and new crossing points, new community spaces and seating. It is unclear which wording in policies VW.6, VW.7 and VW.8 are policy statements and which wording is supporting text. We would recommend that these policies are amended so that the policy wording is separated from the text in clear boxes. This approach should be used consistently throughout the plan.		
VW6 Active Travel		We would recommend that policy VW.6 Active Travel, clearly states the measures which are expected for development proposals. We would recommend wording as below: For proposed new developments within the Plan area that will require the submission of a Transport Assessment/Statement and/or a Travel Plan in order to assess the impacts of the development upon the highway and transport network in the surrounding area, any necessary mitigation measures should be identified to secure improvements for pedestrians and cyclists. Such measures may include new or improved footpath and cycleway links. All such improvements should be designed in accordance with the policies and guidance of Surrey County Council as Highways Authority and should seek to reflect the character of the area and, where appropriate, the local heritage.	Noted, the policy and text has been amended	Yes
VW7 Traffic Management		We would recommend that policy VW.7 Traffic Management is amended to make the policy wording clearer. Wording such as that below could be included in a standalone VW.7 policy or included as part of VW.6: The Neighbourhood Forum will support schemes and developments that implement the Runnymede Local Plan Policy SD3 and secure funding including developer contributions to deliver public realm improvements as set out below/in annex .	Noted, the policy and text has been amended	Yes
VW8 Heavy Goods Vehicles		We would recommend that Policy VW.8: Heavy Good Vehicles is amended or deleted. We support the principles in this policy to reduce the size and quantity of vehicles using roads that they were not designed for, as well as keeping construction traffic to routes that are best designed for them. However, the implementation of this policy is impractical. Routing plans as part of Construction Environmental and Traffic Management Plans that are secured through planning conditions are difficult to enforce. Planning Enforcement Teams	This Policy has been moved to the Aspirations Section	Yes



Section	Reference/ page	Comment	Response	Change to NP?
		find these plans impractical to enforce and the Highways Authority is unable to enforce for specific construction traffic streams. Likewise, enforcing a 3.5 ton limit would require a Traffic Regulation Order and this would ban all vehicles of that size and above, including removal lorries (if a resident wanted to move house), deliveries of e.g. gardening materials alongside any private vehicles that breach this limit. Hence, the Traffic Regulation Order would be impractical and unlikely to be supported by all residents and other stakeholders. Our Transport Development Planning team would be happy to discuss these policies further with the Virginia Water Neighbourhood Forum.		
Climate Change		We support policy VW10 on Net Zero Carbon Building Design which strongly links with SCC's countywide net zero planning programme and Runnymede Borough Council's climate change ambitions. The policy provides a strong and comprehensive suite of statements which enable the realisation of Net Zero development through industry acknowledged standards and carbon budgeting requirements under the Planning and Climate Change Acts and national planning policy. In addition, the policies have purposely considered the full building lifecycle implications and requirements of achieving Net Zero development which crucially references post development and occupancy evaluation of energy efficiency performance targets. The five-part policy explanation following points A – E outlines a robust rationale and reasoning to both the policy requirements and the basis for setting the proposed standards. We would recommend that additional statements are added which: • account for the variances in energy consumption across domestic and nondomestic buildings. • make reference to the upcoming changes to building regulations between the current 2021 Part L update (SAP energy efficiency rating framework) and the Futures Homes Standard's Home Energy Model which will replace SAP by 2025 (projected). It may be difficult to include this adjustment in specific policy objectives, however it could be mentioned that higher standards (and updated energy efficiency measuring baseline) are forthcoming in the policy explanation section and will hence influence policy VW.10 over its lifetime. • add a minimum standard close to the indicators referenced in the policy or alternately draw these out as a general requirement to prevent a bottom out pass if Passivhaus is not feasible. i.e. Policy requirement - Passivhaus Premium, Minimum viable alternative - LETI / Passivhaus Plus We note that the policy calls for the submission of Whole Life-Cycle Carbon Emission Assessments related to the construction and use of a building over its entire life. Where existing buildings are present on a site, the embodied carbon within any standing structures should be factored in. Retrofitting and refurbishing buildings is by some degree a more carbon-neutral activity than demolition and construction. We would therefore recommend that this policy is expanded to include stronger references to the benefits of retaining and retrofitting of existing buildings on a site rather than starting from scratch, and "whole-life" carbon assessments	These comments conflict with those of Runnymede Borough Council who considered that the Reg 14 policy was too detailed and rigid when viability had not been evidenced.	Yes



Section	Reference/ page	Comment	Response	Change to NP?
		should include the entirety of the development process being considered – not just the proposed future building as is suggested here.		
Minerals and Waste		We welcome the reference made to the Surrey Minerals and Waste Development Framework and for applicants to have regard to such.	Noted	No
NPPF references	Noted	We would recommend that the paragraphs of the NPPF listed in paragraph 2.1 are checked to ensure that they match the latest version of the NPPF which was published in December 2023. The flood risk paragraphs are 165 to 175 (not 155-158). The bullets could refer to NPPF Paragraph 180(c) which provides protection for ancient woodland and ancient or veteran trees (which can have significant cultural heritage value in addition to biodiversity value).	Noted	Yes
Mapping		Some of the information in the maps/figures is of a poor resolution and the keys are difficult to read. For example, figure 22 is very difficult to interpret. We are unclear as to whether ordinary Watercourses are included in figure 24.	Noted	Yes
Section 9 history		We would recommend that section 9 on the Virginia Water Neighbourhood History is included at the start before the policies. These paragraphs could be included in section 3.4: Historical Heritage.	Agreed	Yes



APPENDIX D – Members of the Public

Source	Public Representations	Comments	Changes made to Draft Plan
Resident Email 19 th December 2023	It would be nice to improve our neighbourhood area. We definitely need to make it more green. It is vital to make improvements to the public transport especially parking spaces.	Noted	No
Resident Email 7 th January 2024	I live on callow hill and have just received a leaflet asking for feedback on the local plan. I note the proposed cycleway east of callow hill and north of hollow lane goes through the great wood, following an old set of green lanes that have been fenced off since the late nineties under a previous oligarch living at Wentworth house. I'd be over the moon to see these paths reopened but I was wondering what permissions have been sought/need to be sought to implement this part of the plan?	Noted, implementation is outside the scope of the NP document	No
Anonymous 12 th January 2024	These comments are sent further to the following correspondence on the same: Email to Councillor Hulley on Monday 8 January; Email to Councillors Howorth and Coen on Tuesday 9 January; and Email to Michael Corbett on Friday 12 January. These comments do not include any comments on the content of the VWNP because it is only possible to comment on content when the proposals are set out in accordance with the Neighbourhood Plan Regulations 2012. We therefore reserve the right to comment further should this plan proceed beyond the current stage. The flyer says that it is "Published by the Virginia Water Neighbourhood Forum in accordance with Regulation 14 of the Neighbourhood Plan Regulations 2012". This is incorrect - see below for explanation. Regulation 14 sets out basic requirements of the consultation process.	<i>We met back in October and I did raise with you the progress we were making with drafting the VW Neighbourhood Plan. I also explained the next steps in progressing the Plan towards adoption after a village wide referendum.</i> <i>As I am dealing with the current position, I would need to correct your statement that the Council decides if we have conducted the consultation in</i>	No



Source	Public Representations	Comments	Changes made to Draft Plan
	Pre-submission consultation and publicity 14. Before submitting a plan proposal to the local planning authority, a qualifying body must - (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area - (i) details of the proposals for a neighbourhood development plan; (ii) where and when the proposals for a neighbourhood development plan may be inspected; (iii) details of how to make representations; and (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised; Here is a non exhaustive list of reasons why this the requirements of Reg 14 have not been satisfied: 1. Some, but not all VW residents, received the flyer on Sunday 7 January from the VW Neighbourhood Forum - query whether people who work/carry on business in the area have received any details.	<i>accordance with Reg requirements. It is the Inspector who will determine this after all evidence is provided.</i> <i>Our process of Reg 14 commenced on the 18th December when we published our full pre-submission draft Plan on our web site and wrote to all the statutory consultees, (list supplied by RBC), and stakeholders including all Residents' Associations. Posters were placed across the village including rail station, shops, dentist and the Doctor's practice, and 2 x 3 foot banners were displayed within the village.</i> <i>From 4th January volunteers leafletted 2,500 to every home and business. We tried very hard to make this leaflet "punchy" and spent</i>	



Source	Public Representations	Comments	Changes made to Draft Plan
	2. The flyer references two "consultation events" with no explanation as to what is to happen at the events, how feedback would be given at the events (as opposed to emailing with comments), whether feedback is anonymous, what happens once in receipt of feedback. 3. The most fundamental of errors is the fact that it is almost impossible for any consultee to see the proposals. This is because (i) the proposals are scattered in a 63 page document, which astoundingly has no executive summary and is a mixture of policy statements, short and long term strategies, concepts which have no place in a local plan eg because they are dealt with by other authorities such as Highways; (ii) is only accessible online, thereby denying some residents the ability to consider the proposals at home (an exclusion which without doubt adversely impacts on older members of the community). 4. I understand from recent conversations that the plans are available for inspection at the Library and Council offices - however the flyer omits to say this. So even if a consultee with time and patience felt inclined to inspect the plans, they can't. 5. The flyer demands feedback by 11 February and gives residents (at least those who received the flyer) just one weeks' notice of the first consultation meeting. In fact the timeframe for comments began on 18 December, but no resident would ever have known this! Given that this plan has been some 4 years in the making, it is extraordinary to launch the consultation period over the Christmas holidays and notify residents some three weeks later. Whilst the wording of Regulation 14 seems, on the face of it, relatively simple, it has been drafted this way to allow flexibility for the body to consult as it thinks fits and to	<i>extra on the quality of card used so that it didn't look like cheap junk mail. The addition of a QR code was done to make it easy to access our website. Delivering the leaflets and walking through the village allowed us to speak with many residents along the way giving explanations and further details of the Plan's vision.</i> <i>The objective is to encourage attendance at one of our exhibitions and to spread the word to their friends and neighbours. The first exhibition was held last Saturday when 90 residents attended and engaged with the many members of the Steering Committee who were on hand to answer questions raised. The next exhibition is at St Ann's Heath Junior</i>	



Source	Public Representations	Comments	Changes made to Draft Plan
	ensure that the community receives the necessary information, understands the proposals and is able to feedback. It is implicit in all statutory consultation processes that consultation must be meaningful, carried out in good faith etc. However, the Neighbourhood Planning Forum have treated it as a simple box-ticking exercise, without due care and consideration being paid to the key principles. Email correspondence received suggests that the Forum may have confused the process of informing residents with the process of consulting residents. The fact that the Forum have been discussing the VWNP for four years, with stands at local fetes etc, does not absolve them from undertaking the consultation process under Regulation 14. In summary, Regulation 14 has not been complied with and therefore irrespective as to whether the two "events" go ahead and irrespective as to whether comments are received, the Plan cannot progress to the next stage. If the Local Authority were to progress under Regulations 15, I have no intention in corresponding in detail any further on this, as the points i've made are clear and still stand. There is a difference between an information process and a consultation process. So far, the Forum has informed but the Reg 14 consultation is seriously deficient. I see that there has been a belated attempt at an executive summary, posted on the website. It is 22 pages long and is rework of policy statements. In no shape or form is this an executive summary of plan proposals. For a valid Reg 14 consultation, residents	<i>School (4th February) where a banner has been erected on their fence to keep the VWNP forefront in resident's minds.</i> <i>I do appreciate that there are people who have not mastered the use of email and the internet. For this reason, we provided an executive summary with the hard copy at the Library and Council offices. This has now been posted on our website, however, it's still some 10 pages covering what principal policies cover each neighbourhood. We have had for a long time now a You Tube video that explains very clearly in 10 minutes what a Neighbourhood Plan is.</i> <i>I have taken on board your comments about wider awareness, so</i>	



Source	Public Representations	Comments	Changes made to Draft Plan
	and other stakeholders needed to receive a clear and accessible summary of proposals before any consultation meeting. When we met in Costa in November, we met to discuss Trotsworth Avenue. In particular, I enquired on behalf of Trotsworth residents why WERC was not taking any action to enforce restrictive covenants and why they appear to approve developments in Trotsworth Avenue when elsewhere they would not. You agreed to enquire of WERC whether they had approved plans for number 7. You haven't done this. You mentioned the Neighbourhood Plan in passing, saying that you had worked on it for 4 years and the it was many pages long. I said in principle a plan was a good concept, but that you would need community support for it to be a success. I said that so far as Trotsworth Avenue was concerned there were many bridges in need of building. That was all that was said about the plan. I don't know where you think i've said the Council decides on your Reg 14 consultation. That isn't a statement i've made.	<i>yesterday I wrote to all our Councillors advising that if they were aware of any senior residents who would like to be made aware of the Plan, I would be more than happy to hand deliver this summary and offer explanation too. Equally, although we have delivered leaflets to the nursing homes and assisted living/care home accommodation, I'm going to deliver this written summary to them and offer to sit with anyone interested in knowing more.</i> <i>Clearly, we are fully encouraging feedback, questions and comments from residents via the website, but if we get something handwritten, we can always scan this as evidence later.</i>	



Source	Public Representations	Comments	Changes made to Draft Plan
		<i>I hope this gives you a better insight into what we are doing to engage with the widest number of village residents and businesses.</i>	
Local Resident Email 13 th January 2024	I am representing my family (2 adults and children aged 7 & 9). We live in Cabrera Avenue. Since moving to the area (from Egham) in 2021 we have absolutely loved being in the area, the quiet nature of the roads, the family feeling from the other residents of the road has been very friendly and welcoming. Having read the plans my husband and I feel that all the points raised seem very fair and sensible. We agree With maintaining the village feeling, and green spaces, as well as dealing with all the transport concerns raised. We regularly use the Library, however would like to see it open a little more often, because the open hours don't always correlate with the times we can go. (Appreciate that this is reliant on volunteers) The suggestion about developing the village and potentially creating a plaza sounds lovely - we would welcome that! We would be disappointed if paid parking was introduced on the parade and station approach. It would REALLY put me off using the local shops if we had to pay to park. Free parking works perfectly. Or at least 2 hours free parking.	Acknowledged that the success of the two retail parades is fundamental to the community and that a key element is the continuation of the ability to park without cost.	No
Resident Email 22 nd January 2024	A couple of comments in relation to the draft plan. Apologies if any of this is already covered (some of the maps did not display too well):-	Noted	No



Source	Public Representations	Comments	Changes made to Draft Plan
	Footpaths - mention has been made of the requirement for improving the footpath access from the school to the Trumpsgreen shops. The same review / action is required along Trumpsgreen Rd to the shops as the footpaths are overgrown in areas and have become narrow. This will encourage more pedestrian access to the train station and all shopping parades. Safety will also be improved with the avoidance of stepping out into the road. Station - whilst there is mention of improving lighting under the station parage section I would like to clarify that particularly improvements are needed at and around the station and also along the footpath leading to the station from the Trumpsgreen area. Currently the station does not feel like a particularly safe place to wait for a taxi / lift after getting a late train home. Also the footpath running along the railway embankment to the station isn't a particularly nice place to walk. It feels dark, quiet and closed in. Lighting would be an improvement and CCTV would also help along this path. Currently pedestrian access outside of daylight hours to the train station from the Trumpsgreen Rd area is very poor making winter commuting and travel quite difficult. I am in support of the proposed traffic calming measures in the Trumpsgreen area. With the considerable impending new developments in the area the impact of long term construction traffic and resultant residential traffic is a real concern. I would also suggest that speed cameras are installed with the new speed restrictions as currently the 40mph limit is frequently not adhered to.		
Resident Email 25 th January 2024	I live in Wellington Avenue and am commenting on the heart of the village, I totally agree with reducing the speed limit to 30mph through Virginia Water, especially Christchurch Road and Wellington Avenue. At the moment too many drivers are speeding well in excess of the 40mph limit. With more development planned in the area this must be stopped and traffic calming measures put in place or the problem will only get worse.	Noted	No



Source	Public Representations	Comments	Changes made to Draft Plan
	I am also in favour of improving Virginia Water train station, by removing the derelict garages and maybe a planting scheme/ visual improvement of the area. Also could some new trees be planted to replace old ones that have died in various areas along Christchurch Road, It is the beautiful trees that make Virginia such a special place to live, and we need to keep it that way by planting for the future.		
Resident Email 01 st February 2024	On the latest draft of the Neighbourhood Plan, I had some comments relating to the sections on Community Infrastructure (VW11 and elsewhere in the document); - The document refers to the Virginia Water Football Club and the Knowle Hill Tennis Club as key infrastructure, but both of these are only tenants on the King George V Playing Field. The playing field is, in fact, critical infrastructure. The site was donated to the community by the Crown in the 1930s for the express purpose of facilitating recreation for residents, and this is enshrined in covenants relating to the site. This site (and indeed any other such sites in the locality) should be given special attention to ensure that their purpose and status is protected. The football club and tennis club owe their existence to this principle. The King George V Playing Fields should be identified as a key infrastructure item, and added explicitly to the infrastructure listing in the Plan. - Runnymede Borough Council are the legal owners of the land and should act in accordance with the provisions of the deeds for the land. However, it has become clear over recent years that their actions in this area are now strongly influenced by other factors and the protection of the land for its intended use can longer be taken for granted. The council discussions and decisions over use	From these comments Policy VW10 (Community Infrastructure) to include the tennis club, King George V playing fields and the football club. There is no question As these are considered important well used community assets within the village.	Yes



Source	Public Representations	Comments	Changes made to Draft Plan
	of the site are typically carried out without and consultation or involvement of residents and I believe that the Neighbourhood Plan provides an opportunity to rectify that. I would propose that a management committee is established for the playing fields (along the same lines as that for the Cabrera Trust land) in order to create more transparency and community involvement in decisions relating to this important piece of community infrastructure and I would request that this proposal is added to the Neighbourhood Plan.		
Resident Email 02nd February 2024	I found this document interesting and agree with most of the observations and proposals. It does make thoughtful and relevant observations about transport and the desirability of improving the environment through the use of pedestrian and cycle facilities in addition to the use of public transport. However one topic that I think is not well covered is the poor bus facilities serving Virginia Water, particularly in comparison with other local settlement areas within Runnymede borough, such as Egham, Chertsey and Addlestone. These have both more frequent services and significantly more routes and destinations served. Although many, probably most, Virginia Water residents do have access to a car there is a significant minority, including the elderly and disabled, who would prefer, or are compelled, to use public transport, particularly the bus. The local community should in any event seek to encourage alternatives to car use for the reduced environmental impact. Virginia Water does have a reasonable rail service, but the bus service is infrequent and largely duplicates the rail route serving Egham and Staines. Bus travel in other directions such as to Chertsey, St Peters hospital, Windsor, Woking etc can only be accomplished	Noted, however, the provision of bus services is beyond the remit of the NP	No



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	with awkward changes at Egham or Staines and as the timetables are not arranged to facilitate interchange, even where such travel is possible long waits for connections are required. Of particular note, Virginia Water is now part of the Windsor constituency and one of the arguments used to support this change was that (supposedly) 'Englefield Green and Virginia Water are areas that look to Windsor and Ascot for entertainment and commerce, and are more similar in character to Windsor and Ascot'. Both Staines and Egham have a good bus service to Windsor; Virginia Water seems to have been generally left behind in the provision of bus services. There is a danger that the current service is close to the point of downward spiral, where the infrequency of service and poor connections will lead to increasingly limited usage and pressure to further reduce services, and so on. One minor point concerning the bus service is the suggestion to close one of the access roads into Station Parade (p32) - this is currently used to facilitate the bus movements in and out of Station Parade so maybe there should be bus-only in and out access retained? There is also a danger of increased congestion at a single access point, so I suggest this aspect of the plan needs careful consideration.		
Resident Email 18th March 2024	In response to the policy "VW.5 Trumps Green Shopping Parade": This policy represents my foremost disagreement with the current plan. If the objective of the plan is to protect the character, safety, accessibility, sustainability, and environmental quality of the village - such as by reducing traffic, and its associated noise, pollution, industrial visual ugliness, hustle, bustle and contribution to road accidents, and increasing the uptake of active travel - the best means of achieving this objective, would surely be to actively reduce the spread of car-centric infrastructure - such as parking. The simplest, cheapest, most effective, and politically least controversial option to achieve this, by far, would be to simply not increase the availability of such	Noted, detailed arrangements for parking and improvements to the public realm are beyond the remit of the NP document itself. Policy VW5 Active travel seeks to improve the	No



Source	Public Representations	Comments	Changes made to Draft Plan
	infrastructure. The proposal to increase parking spaces, as such, seems inimical to the stated objectives of the plan, and I am heavily opposed to it. Ideally, the existing infrastructure should instead be actively repurposed: certainly one or more of the already existing spaces can be reserved for disabled parking, one for business use, and another for parent and child. The bus stop should also be more clearly demarcated, especially to accommodate improvements in the frequency of service, and a proper bus shelter should be erected. Lastly, if I am understanding it correctly, the plan seems to indicate that the proposed additional parking spaces are intended to replace the landscaped seating areas - which would further remove greenery, character, and 'third place' amenities from the village. If anything, more greenery should be being added and properly maintained. To this point, the landscaped flower areas are nice in the summer, but could at least some of these not also be planted wholly or partially with denser, more year-round greenery? As they are otherwise bare soil for roughly 6 months of the year. In response to the policy "VW.7 Traffic Management": I recommend that the phrase <i>"make a direct and proportionate contribution to delivering improvements in highways infrastructure"</i> should be amended to <i>"make a direct and proportionate contribution to improving overall net biomass within the Green Belt, and to delivering improvements in travel infrastructure, particularly active travel and public transit infrastructure."</i> As these should be made a priority over expansion of road and highway infrastructure. Those were my two principle responses. If you could please let me know how and when I can expect to receive or access a response from the Steering Group, this would be much appreciated also.	environment for pedestrians and cyclists.	
Resident Email	After reading through the proposal document, it's clear that a lot of thought and effort has been put into this document. I'm heartened by statements that emphasize ways to	Noted. The maps have been changed. Detailed	Yes, maps have been changed



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21 st March 2024	keep the village feel and ensure there is a “Local Gap” to prevent the general merging of the surrounding village with Egham / Staines etc. I think moving forward this will become a bigger issue with the pressure to build more houses in the area. It feels like the pressure to build more within Virginia Water is because we have a nice area. This isn’t fair. A general feedback point concerning the maps and drawings in the proposal document. They seem to be such low resolution that discerning what the document describes requires some detective work. It would have been nice to include links to higher resolution maps to make it possible to view the maps easily. Moving onto my comments to the proposal:- According to the proposed development plan, there is a plan to implement a number of 20mph zones around Virginia Water with the aim of enhancing road safety and creating a more enjoyable environment, thereby encouraging increased pedestrian and cycle traffic. Whilst we all understand safety increases with a drop in speed limits my concern is that this will create a rat run effect around Virginia Water reducing the safety on many roads where currently children can cycle etc with a reasonable amount of safety. Feedback from areas that have implemented widespread 20mph zones suggests potential drawbacks, including heightened traffic congestion, driver frustration, and adverse effects on local businesses. Extended travel times on these roads can result in increased pollution, and the inconvenience may lead to a decline in trade for local establishments. This could potentially raise concerns that businesses may face negative consequences under the proposed changes. It's worth noting that studies show cars travelling at this reduced speed can consume more fuel and be less efficient, contributing to increased emissions.	issues around traffic speed zones and parking are not within the remit of the NP document itself.	



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	Regarding proposed changes to parking at Trumps Green parade of shops, the suggestion to introduce angled parking bays which will in total add two additional parking spaces at the parade of shops does not seem beneficial. The current parking accommodates 10/11 vehicles, and the proposed plan outlines 12 spaces plus one disabled space. Visibility concerns arise with diagonal parking, making it challenging for drivers to see oncoming traffic or pedestrians when exiting parking spaces. The pavement which is currently wide, will be significantly narrowed to make the proposed parking spaces. The parade of shops regularly receives delivery vans, and the new parking arrangement will create difficulties for them, potentially obstructing traffic flow or taking up multiple spaces. Additionally, large vehicles, such as those from Longcross studios and trades / construction vehicles and vans, may not benefit from angled parking, leading to potential inappropriate parking and safety concerns near proposed pedestrian crossings. This issue can already be seen along the parade of shops on Station Approach where these kinds of vehicles often cause obstructions. In my view creating all this for two spaces and the potential impact to local businesses is not worth the expenditure. The road past the shops is currently a 30mph zone, and the implementation of a 20mph zone may not necessarily deter users from speeding as they often do currently. Again, a potential safety issue. This link gives some details on a town that trialled 20MPH zones and the impact https://www.walesonline.co.uk/news/wales-news/welsh-town-trialled-20mph-speed27772691 I think one idea is to introduce 20mph past the local schools and have some lights that indicate when the schools are active. Outside the active hours the limit could be raised to the current 30mph. The plan also describes improving the access from the Bourne Road area, though the woods to the train station.		



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	Whilst I can see that the current steps along this footpath are significant safety issue and resolving this is overdue, one of my concerns is about the proposed ramp which could potentially be an eyesore in a tranquil wooded area. In addition, the knock on issue of commuters using the Bourne Rd/ Trumps Green Ave area as free parking will increase with the improved footpath. The situation will only get worse as more housing is built in the Longcross area. I find the development plan's proposal to add more green space around the station by closing a road and planting trees to be humorous. This is quite ironic as the current carpark situated near the station area was previously a park. The council, against the wishes of local residents, sold off the Bourne car park in 2016 to build retirement accommodation creating a shortage of parking space which resulted in the park getting built over for more spaces. All of this has the effect of removing the character of Virginia Water and making our village just another town with no defining features. The area around the train station could be anywhere in the UK. I fear the 20mph signage and traffic calming features and the new parking arrangements at the Trumps Green shops will also add to erasing the essence of Virginia Water to becoming "any town".		
Feedback received from a member of the library during Regulation 14	Very useful to have all this printed and not just online. Thanks. Fully support traffic calming and new crossings, both are currently very dangerous, both for pedestrians and cyclists and even cars (emerging from side roads).	Noted	No
Feedback received from a member of the	The whole area needs to have weight restrictions for lorries and car transporters trying to get around which makes cars have to reverse.	Noted	No



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library during Regulation 14			
Feedback received from a member of the library during Regulation 14	Seating is needed between the two rows of shops. More rubbish bins that will be emptied on a regular basis.	Noted	No
Feedback received from a member of the library during Regulation 14	There is a need for public transport to enable visits to St Peters Hospital	Noted	No