



CHOBHAM PARISH COUNCIL

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The Policy and Strategy Team
Runnymede Borough Council
Civic Centre
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By post and email to planningpolicy@runnymede.gov.uk

Dear Sir/Madam

Runnymede Local Plan 2035 Issues, Options and Preferred Approaches – Consultation

Thank you for inviting Chobham Parish Council's views on the above consultation. As Chobham lies outside of the Borough of Runnymede, we will not be responding on the consultation as a whole, but limiting our comments to those aspects relating to the former DERA site at Longcross, which as you are aware is a topic of significant concern to Chobham.

1) Spatial Vision, Objectives And Strategy

The policies of Runnymede Borough Council (RBC) should reflect the National Planning Policy Framework (NPPF) and support recent Government pledges to protect the Green Belt from development. Any proposal to amend the Green Belt boundary or remove any area from the Green Belt must be subject to detailed review and examination, and have a separate Public Inquiry.

The former DERA site has not been demonstrated to be sustainable, in fact RBC has itself previously challenged the sustainability of the DERA housing allocation through its response to the South East Plan, and recommended replacing the existing commercial floor space only. The site has not been proven to be consistent with achieving sustainable development, a core principle of the NPPF.

No exceptional circumstances have been demonstrated to support the site's removal from the Green Belt, either wholly or in part. The larger southern section of the site is mostly green and wooded and is only sparsely developed. Commitment should be made to retain it within the Green Belt.

In view of significant concerns raised by Chobham Parish Council and others, we urge that RBC withholds a decision on any replacement or further planning applications for any part of the former DERA site until after the adoption of its Local Plan. Without it there is no secure basis for a decision on these applications.

RBC has previously indicated that specific details of the proposed former DERA site development would be set out in a master plan which would form part of a Supplementary Planning Document. The new documentation does not appear to state whether this will still be the case.

2) Housing

At the 2000 Runnymede Local Plan Public Inquiry, the former DERA site was recommended for exclusion from Runnymede's plans for new housing provision due to its unsuitability for housing. It remains unclear what evidence has informed the decision to propose to go against this recommendation.

Homes proposed for the former DERA site were previously recognised in the South East Plan as incremental to Runnymede's basic requirement and *"In the event that the site cannot be released for housing, there is no expectation that the shortfall should be provided elsewhere within Runnymede."* It is also unclear exactly why these circumstances have changed and greater clarity around the number of dwellings proposed to be delivered in the existing urban areas compared to those proposed for the more remote former DERA site would be appreciated.

3) Retail And The Economy

RBC's February 2010 Employment Land Review points out that two estimates indicated no need for the DERA site to meet future employment requirements. It cites sustainability prospects of a large business park on this site as "relatively poor" and reports the site overall as a "poor employment site".

The significant limitations and risks of the former DERA site for employment also appear generally well documented in the updated Employment Land Review, yet it still appears that the site is being proposed as the main employment opportunity for the Borough ("just under 74% of the net increase in employment floorspace associated with the pipeline supply"), with little in the way of alternative proposals being made.

It is felt that the existing employment use of the former DERA site is misrepresented by its introductory mention of "thousands of staff" and by the term "major developed site". While this may be a fair representation of its previous military use, it should be made clear from the beginning that this has not been the case for many years and the current use as a film studio on the North side of the site is relatively low key (circa 200 full-time equivalent employees). As previously mentioned, the South side is predominantly green and wooded and is only sparsely developed with small scale business use mostly around the test track.

4) Built Environment

Comments relating to built environment are covered under the other sections of this response.

5) Natural Environment

The proposed large scale development of the former DERA site represents a clear threat to the neighbouring Chobham Common Special Protection Area. Local policies need to support the NPPF in steering development away from sensitive locations.

6) Recreation, Green Space And Leisure

Should amendment of the Green Belt boundaries be considered in relation to the former DERA site, there is no justification for removing any proposed areas of Suitable Alternative Natural Green Space (SANGS), or other green recreational areas, from the Green Belt. These areas should remain as pockets of Green Belt land.

7) Heritage

No comments to make at this stage.

8) Transport And Infrastructure

Chobham Parish Council has repeatedly asked to be fully engaged with the traffic study in its area. It is particularly concerned about vehicular movements through its historic and weight-restricted High Street, and with the anticipated pressure on the A319 Chertsey Road identified in the Transport Assessment. Development plans must be able to demonstrate appropriate strategies to mitigate traffic impact.

The Council has previously highlighted that estimates of vehicular movements for the former DERA site appear modest, considering the number of car parking spaces on site and the various proposed mixed uses. There still appears to be a presumption of high reliance on the motor vehicle in connection with this site, which is again inconsistent with achieving sustainable development. Accessibility of the site and its isolated location are noted as key weaknesses in RBC's Employment Land Review and these points should not be minimised.

Any upgrades to Longcross railway station and the rail service should be for the benefit of the wider local community with appropriate parking and waiting arrangements, and be seen as an opportunity to help alleviate motor vehicle usage in the area.

With the proposals for the former DERA site anticipating some 491 secondary school pupils but no provision for secondary education, the development cannot be considered a "sustainable community" in itself.

A significant amount of infrastructure is proposed for the site (highways, transport, primary school, recreation, leisure etc.) but while some initial costs appear to be

expected to be developer funded, funding for ongoing maintenance and running costs seem vague.

9) Flooding

It should be noted that any development within Runnymede has the potential to create additional flood risk outside of the Borough, particularly where development is close to the local authority border. The scope of the Runnymede Strategic Flood Risk Assessment should therefore include suitable cooperation with neighbouring Borough Councils. The Parish of Chobham is markedly vulnerable to flooding, and this cooperation is therefore vital to ensure that RBC's development plans create no additional flood risk in Chobham.

10) Other Comments

Chobham is a "key stakeholder" in matters concerning the former DERA site. The Parish Council suggests RBC carries out greater consultation and engagement with the community of Chobham at a local level.

Thank you for taking these comments into consideration. If we can provide any further information in support of the points raised, please do not hesitate to contact me.

Yours faithfully



C L Cooper
Planning Administrator

cc: Mrs Jenny Rickard, Surrey Heath Borough Council
Mr James Osbourn, The Chobham Society
Cllr Mike Goodman, Surrey County Council