



CHOBHAM PARISH COUNCIL

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21st June 2017

Planning Policy and Strategy Team
Runnymede Borough Council
Civic Centre
Station Road
Addlestone
KT15 2AH

Dear Sir/Madam

Runnymede Local Plan 2035 Additional Sites and Options – Consultation

Thank you for inviting Chobham Parish Council's views on the above consultation. The Parish Council has already responded to the Issues, Options and Preferred Approaches consultation (letter dated 22nd August 2016) and the following points should be read in conjunction with the earlier response.

Chapter 3: Identification of additional land use allocations

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

Please could you ensure that Chobham Parish Council is consulted on any proposal to amend the Green Belt boundary.

Chapter 4: Amendments to allocations proposed in the Issues, Options and Preferred Approaches document

The Parish Council does not agree with the increased capacity proposed for Longcross Garden Village (increased from 1500 to 1700 residential units), for the same reasons as it does not support housing development on this site in general. Please refer to the Parish Council's letter of 22nd August which sets out in detail the reasons against the housing allocation, including the following:

- Inappropriate development in the Green Belt, no proven “very special circumstances”.
- Documented unsustainability of the site.
- The southern section of the site is mostly green and wooded and should not be considered as brownfield land.
- Clear threat to Chobham Common Special Protection Area which cannot realistically be mitigated.
- Significant concerns around traffic and road infrastructure, both on its own and in combination with other development proposed in the locality.

Chapter 5: Impact of additional allocations and other amendments to the Council’s approach on the Council’s preferred spatial strategy

Chobham Parish Council supports the revisiting of the Runnymede-Spelthorne Strategic Housing Market Assessment in light of Britain’s decision to exit the European Union, prior to the submission of the Local Plan to the Secretary of State. It recognises that this may lead to a reduction in the need for housing in the Borough.

With regard to the DERA site (Longcross Garden Village) providing its own Suitable Alternative Natural Green Space (SANG) solution, the Parish Council wishes to reiterate that there is no justification for removing any proposed areas of SANG, or other green recreational areas, from the Green Belt. These areas should remain as pockets of Green Belt land.

Chapter 6: Amendments to policy options from that set out in the Issues, Options and Preferred Approaches consultation – NATURAL ENVIRONMENT

The Parish Council again wishes to emphasise that any SANG solution(s) for the Longcross Garden Village site will not realistically mitigate the legal requirement to ensure that no further harm is caused to the Thames Basin Heaths Special Protection Area (TBHSPA) from new development. It challenges the Habitats Regulations Assessment’s conclusion that “there will be no adverse effects to Thames Basin Heaths SPA as a result of the proposals in the Runnymede Local Plan” (as stated in the officer responses of the summary of representations received during the Issues, Options and Preferred Approaches consultation).

Chapter 6: Amendments to policy options from that set out in the Issues, Options and Preferred Approaches consultation – FLOODING

The wording addition to the preferred approach F2/01 is noted. The Parish Council wishes to reiterate 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 Parish of Chobham is markedly vulnerable to flooding, and RBC’s continued cooperation with Surrey Heath Borough Council is vital to ensure that RBC’s development plans create no additional flood risk in Chobham.

Chapter 6: Amendments to policy options from that set out in the Issues, Options and Preferred Approaches consultation – ADDITIONAL POLICY AREAS

It is noted that available approaches to sustainable development include introducing a strategic policy or a small suite of policies on sustainable development. As a key stakeholder in matters concerning the Longcross Garden Village site and its sustainability, please could Chobham Parish Council be consulted on this policy, or suite of policies.

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

Yours faithfully

A handwritten signature in black ink, appearing to be 'CLC' or similar, written in a cursive style.

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