



CHOBHAM PARISH COUNCIL

The Clerk, Chobham Parish Pavilion, Recreation Ground, Station Road
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20th February 2018

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

Dear Sir/Madam

Runnymede 2030 Draft Local Plan Consultation Letter of Objection

Thank you for inviting Chobham Parish Council's views on the above consultation. The Parish Council does not consider the Plan to be sound in respect of the proposal to build a minimum of 1,718 residential units (increased from 1,500) on Green Belt land at Longcross Garden Village.

The policies of Runnymede Borough Council (RBC) must reflect the National Planning Policy Framework (NPPF) and adhere to Government pledges to strongly protect the Green Belt from development. The Parish Council therefore objects to the Runnymede 2030 Draft Local Plan on the basis of the following points:

1. Green Belt

The Longcross Garden Village site has not realistically been demonstrated to be sustainable. RBC has in the past previously challenged the sustainability of housing at the site through its response to the South East Plan, and recommended replacing the existing commercial floor space only.

It is noted that "the exceptional circumstances to alter Green Belt boundaries have been set out in a separate topic paper". This paper would appear to be a key consideration in the consultation process but it does not appear to have been included with the consultation documentation. 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, and any proposal to amend or erode the Green Belt boundary should be a last resort with separate detailed review and public inquiry.

Should release of Green Belt land be considered in relation to this 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.

2. Employment and the Economy

The significant limitations and risks of the Longcross Garden Village site for employment have previously been well documented, yet it still appears that the site is being proposed as the main employment opportunity for the Borough, with little in the way of alternative proposals having been made through the Local Plan process.

It is felt that the existing employment use of the Longcross Garden Village site has been misrepresented through the process, with mention of “thousands of staff” and by the term “major developed site”. While this may be a fair representation of its previous military use, 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.

3. Natural Environment

The proposed large scale development of the Longcross Garden Village site represents a clear threat to the neighbouring Chobham Common Special Protection Area which cannot realistically be mitigated. Local policies must support the NPPF in steering development away from sensitive locations. The Parish Council urges that Runnymede Borough Council should be doing its utmost to help preserve, protect and enhance this site of international significance.

4. Recreation, Green Space And Leisure

The Parish Council 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. The proposed SANG is further away than Chobham Common for a significant proportion of the site. The Parish Council 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).

5. Transport And Infrastructure

Chobham Parish Council is particularly concerned about vehicular movements through its weight-restricted High Street and on the A319 Chertsey Road and other trunk roads in the area. Plans must demonstrate appropriate strategies to properly mitigate traffic impact, not only for the Longcross site itself but in combination with the significant other development (both granted and proposed) in the locality. A cross-borough joined up approach is imperative.

The Parish Council has previously highlighted that estimates of vehicular movements for the Longcross Garden Village 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 key weaknesses 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 Longcross Garden Village site anticipating some 491 secondary school pupils but no on site provision for secondary education, the development cannot be considered "a sustainable community capable of meeting its own day to day service needs." Additionally, no specific mention is made of health service provision on site, or burial land.

6. 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 Parish of Chobham is markedly vulnerable to flooding, and cooperation between relevant authorities is vital to ensure that RBC's development plans create no additional flood risk in Chobham.

Please could you ensure that Chobham Parish Council is consulted on any proposal to amend the Green Belt boundary, and notified of:

- the submission of the Local Plan for independent examination; and
- the publication of the recommendations of the person appointed to carry out an independent examination of the Local Plan; and
- the adoption of the Local Plan.

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



C L Cooper
Planning Administrator

cc: The Rt Hon. Michael Gove MP
Cllr Mike Goodman, Surrey County Council
Mrs Jenny Rickard, Surrey Heath Borough Council