

Jigsaw Planning and Development Limited

Office 29b
Minster Chambers
Church Street
Southwell
Nottinghamshire
NG25 0HD



Chobham Neighbourhood Plan
2019 to 2038
Pre-Submission Version Document for consultation
at Regulation 14
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Representations on behalf of ADP Fairoaks Ltd

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1.0 Executive Summary

- 1.1 The existing employment area at the Fairoaks Airport site is both previously developed land (PDL) and a designated Major Developed Site (MDS) within the greenbelt. It is an extensive collection of buildings, some of which are large and visually dominant within the greenbelt. The buildings are of poor condition, tired and in need of redevelopment given they are not fit for purpose. The owners are willing to reinvest and repurpose the employment site, in a manner which is fit for the next phase of higher order employment use.
- 1.2 Most of the employment on this site is now unrelated to aviation and has a minimal relationship with the airport itself, albeit there is extant Permitted Development available to the owner to the east of the existing buildings, to the south of the colloquially known Cricket Pitch.
- 1.3 The review of the Neighbourhood Plan presents a rare opportunity to re-designate this site through the democratic alteration of the plan policies. Importantly, there is strong justification for the designation of the site as a higher status Strategic Employment Site (SES) in the East of the Surrey Heath Borough.
- 1.4 There is strong demonstrable film and media related interest, which would deliver high-quality modern employment, addressing a UK and worldwide demand.

- 1.5 Minor alteration of the previously designated MDS to a proposed Locally Important Employment Site (LIES) is a wasted opportunity. The raising of its status to an SES would reflect the employment ambitions of the SHBC Employment Strategy. In any event, the restricted boundary of designation requires greater flexibility to deliver practicable redevelopment and provide the opportunity to decant existing tenants who may wish to remain.
- 1.6 The visual impact on the openness of the greenbelt would be minimal compared to the economic benefits available and the current collection of large buildings does not serve the purpose of greenbelt. This is an opportunity to release its full development potential and is a rare opportunity as the site is not inhibited by other important ecological designations. Please also note that the views referred to within your documentation will likely be compromised by an extant Permitted Development, referred to in more detail later in formal objections.
- 1.7 Redevelopment to create a new film and media-based employment campus, would be a complementary and sustainable economic development opportunity, having good links to the M3, M25, Woking and neighbouring McLaren Technology Park.
- 1.8 The benefits of providing modern, energy efficient buildings would be to the benefit of climate change and air quality agendas.
- 1.9 The proposed designation of Locally Important View 8 is unjustified and arbitrary. In any event, it is already compromised by an extant exemption/permission to construct a large hangar within the designation.

2.0 Overview of Employment Opportunities at Fairoaks

- 2.1 The existing employment area at the wider Fairoaks Airport site is both previously developed land (PDL) and a designated Major Developed Site (MDS) within the Greenbelt.

It is an extensive collection of buildings, many of which are large and visually dominant within the greenbelt. The buildings are of mediocre condition, tired and in need of redevelopment. The owners are willing to reinvest and repurpose the employment site in a manner which embraces the next phase of higher order employment use, in support of the SHBC Economic Development Strategy ambitions, set out below.

It is also of note that the landowner actively wishes the Airport operations to continue at the site.

- 2.2 Surrey Heath Borough Council Economic Development Strategy 2023-2028

This important Council document sets out a positive open for business approach to create a great place for business to flourish. The local policy context seeks to create an additional 7500 new jobs by 2028 through the flexible supply of high-quality employment floor space. In existing employment areas the strategy includes more intensive use through redevelopment.

- 2.3 The suggested redevelopment of the Fairoaks Airport site can contribute to much of the ambition of the strategy by creating a new fit for purpose employment campus, focusing on the opportunities in digital technology, film and media output.

- 2.4 The document seeks to maximise re-use of brownfield land, regenerate key sites and support business growth. Its stated aims seek to encourage innovation and inward investment.

The document makes specific reference to the potential at Fairoaks, as set out below in 2.5.

2.5 Film Production and Supporting Creative Industries

There has been significant interest from several international film production companies such as Disney and Netflix for locations in Surrey Heath or its immediate environs creating a major impact on the demand for related supply chain activities within the area and for skilled people within the job market. This is particularly apparent given the distillation of filming out of Longcross.

At Fairoaks, there is already a cluster of related support industries and current interest in from international participants expanding the existing film studio activity. Should the Fairoaks proposal move forward, there will be a need to be ready to respond to the major supply chain and educational opportunities that would be generated for the local creative industry ecosystem. To evolve, this sector would need boosting, including an assessment of the workspace provision needed for a stronger grouping of creative supply and support activities.

2.6 Transformational Opportunities Existing Sites with Potential For Transformation

There are no major greenfield sites available under current allocations, but the following existing sites have scope for redevelopment or refurbishment.

Fairoaks Airport is close to the M25 and could be developed for film studios. It is emphasised that the council would need to work with existing employers to make this happen

- 2.7 The owners of the employment site at Fairoaks airport wish to contribute to the delivery of these ambitions and work with the Council to produce a modern and energy efficient employment campus in full compliance with the economic objectives of the Council.
- 2.8 **Current Employment Relationship to the Airport**
- 2.9 The majority of the employment on this site is unrelated to aviation and has a minimal relationship with the airport itself. The tenancy base at Fairoaks Airport has changed moved some years ago from limited and low density aviation employment and related occupiers, to a range of sectors that draw workers from across Greater London. This includes studio / film production in the form of Netflix, Amazon, Marvel and related high profile film productions; professional services, IT consultancy, food / catering, engineering, creative/arts, medical and others. The companies now range from locally based SMEs and start-ups to large multinational corporations including work with such companies as Apple. Despite the poor condition of the current premises, there continues to be strong demand. This is due to the commercially attractive site and location that provides good access to the strategic road network and to Greater London.
- 2.10 The current employment is estimated to be about 450 with about 370 full-time employees. The largest concentration of workers (and floorspace) is in the film production studios which employs about 230 workers (including about 170 who are full-time). 2.2.7. The largest concentration of employment is in studio/film production activities followed by professional services, IT engineering and aviation.
- 2.11 This demonstrates that there is a diversity of jobs from high-value professional and Filming employment to lower skilled services jobs. The cluster of aviation-related activity represents only a small proportion of the occupancy base but remains a vibrant sector that provides a range of synergies with other onsite activities. However, only two of the Fairoaks Airport's 72 tenants are dependent upon the runway and aerodrome.
- 2.12 The review of the Neighbourhood Plan presents a rare opportunity to re-designate this site through alteration of Plan policies. Importantly, there is strong justification for the designation of the site as a higher status Strategic Employment Site (SES) in the East of the Borough.
- 2.13 The proposed employment allocation area would be used for the following uses: Classes B2, B8 and E (g), including the opportunity for the use of land and buildings within the defined area as purpose-built media/film studios. ADP request that additional designation is allowed to facilitate the de-canting and retention of those existing business who wish to remain whilst re-investment and new purpose build is achieved. This land provides little contribution to the purposes of Green Belt and is a prime example of low-quality brownfield land contained within it.
- 2.14 There is strong demonstrable film and media related interest which would deliver high-quality modern employment, addressing a UK and worldwide demand.
- 2.15 The encouragement and support of the British Film Commission and evidence of recent new film related tenancy leases confirms the genuine opportunity to deliver a significant inward investment opportunity on the National stage and transform the opportunities for the current and next generation of the Borough.
- 2.16 This is alloyed with the distillation of filming out of Longcross in favour of residential development of that site.

- 2.17 The recent report below, highlights the supply of UK film studios on offer is insufficient to keep pace with the rising demand for new content. This shortage is placing sustained upward pressure for new development and investment in the sector:

Knight Frank

The UK film and television studio market

Taking centre stage 2022

<https://content.knightfrank.com/research/2439/documents/en/uk-film-and-television-studios-market-2022-9004.pdf>

- 2.18 Major streaming platforms and film studios are making long-term commitments to production in the UK taking studio space or sites and investing in training for crew. London and the Southeast remain the focus for film and TV production accounting for 60% of current studio stock. Growth in domestic and international streaming markets is likely to mean continued strong demand for studio space in and around London.
- 2.19 This sustained growth can create an estimated 63,000 jobs in the screen industries across the UK by 2025. Major studios are committing to new space for longer and converting and adapting existing space to satisfy requirements. However, many existing industrial units for conversion and retrofitting are less than satisfactory and a strong preference is for new purpose-built studio space. An additional 6m ft.² of space is estimated to be needed between 2022 and 2026.
- 2.20 The growth in TV and film investment in the UK is a result of tax relief and other initiatives, a supportive culture and location, especially near London, attracting international interest. The UK benefits from English speaking and high calibre crew and talent.
- 2.21 Demand for studio space far outweighs current supply and there is a need to attract and retain skilled crew by the creation of an interconnected network of such facilities, especially around the M25 arc.
- 2.22 Alongside this, major film companies are investing in training and development often in collaboration with higher education sectors.
- 2.23 Purpose-built studios are attractive for large-scale high-end film and TV work and normally require an extensive site with associated workshop facilities. Relatively few of these currently exist in the UK and there is strong growth in demand for such modern facilities. The industry has sufficient capital and demand for content and can therefore offer resources to meet the necessary infrastructure costs.
- 2.24 ADP have engaged with the **British Film Commission** with regard to the potential of Fair Oaks as a media / film campus location.
- 2.25 The British Film Commission (BFC) is the national agency with a remit to maximise and support the production of international feature film and television in the UK
- 2.26 The BFC's Government-set remit is to:
- Maximise and support the production of major international feature film and high-end television in the UK
 - Strengthen and promote the UK's film and television infrastructure.
 - Liaise between the Government and the film and television industry to secure and maintain film-friendly policies.
- The BFC provides

- Bespoke production support and troubleshooting
- Assistance with sourcing studios, facilities, locations, key crew and talent for major productions
- Comprehensive guidance on the UK's film and TV tax reliefs and production funding
- Advice on production-related regulations and permits including visas
- Introductions to expertise throughout the UK via our network of public and commercial industry partners
- Liaison between government and industry to ensure the UK remains the best place to produce film and TV

- 2.27 Discussions have taken place with the BFC with regard to the particular consideration of Fair Oaks airport as a potential new film studio and media hub. Their response was positive and gave strong encouragement to pursue such ambitions.
- 2.28 Fair Oaks' location is an important factor, lying in a perfect position around the NE to SW arc of the M25 and close to Heathrow in what is described as the Golden Triangle. Redevelopment to create a new media-based employment park would be a complementary and sustainable opportunity having excellent links to the M3, M25, Woking and neighbouring McLaren Technology Park.
- 2.29 Discussions to date have suggested that at Fair Oaks the optimum would be six to eight stages to ensure continuous cycles of production
- 2.30 Each studio should stand alone not back onto each other to avoid noise transmission and alongside the stage space should be workshop space at approximately half the footprint ratio to staging. Additionally, there should be ability for office, dressing room and separated spaces.
- 2.31 Backlot space is required for outdoor sets and filming and this can be between stage spaces. These should have a good vehicular access and close to inner /outer elephant doors of the studio with ready HGV access to deliver materials and sets
- 2.32 The BFC indicate that for Fair Oaks with eight studios, two shared backlot spaces would be sufficient at a suggested 1.5 hectare outdoor space for each lot. A modern backlot could have major advantages by having on-site power not reliant on diesel generators, supporting green credentials. Around studios electric vehicle and pedal power only would be permitted.
- 2.33 The BFC would be keen to work on a Sustainable Servicing Strategy as Fair Oaks would offer a new opportunity for green newbuild studios. A non-diesel reliant site could be developed with reserve electricity at substations for smart switching thereby ensuring maximum energy efficient electricity usage for the overall site, including backlots. The scheme could also incorporate roof PV generation and water harvesting.
- 2.34 The BFC are anxious to explain the very wide job range involved on any campus.
- 2.35 This covers a multitude of STEM jobs ranging from acting, directing, field technicians, crew lighting and set construction, involving many transferable trade skills such as electricians, carpenters, plasterers and plumbing
- 2.36 Support services also cover costume design and production, catering, on site crèche, administrative roles, logistics, accounts, lawyers and writers. Contrary to much public perception, a full range of employment is required. Importantly, Digital Technicians are much in demand for digital coding, animation and gaming, which produces a modern skilled employment on the campus.

- 2.37 This emphasises the important links to further and higher education as there are national concerns regarding skill shortage, with crew demand near saturation. Educational links with universities and local colleges supports digital creatives, virtual production and all construction trades. BFC stress the focus on next generation opportunities, including apprenticeships and the need to nurture such relationships and joint ventures with local schools colleges and universities.
- 2.38 The BFC are particularly supportive of Fairoaks as for the industry, postcode is vital for close inter relationship with other sites. Fairoaks represents a genuine opportunity for the creation of a modern, green media campus. This is demonstrated by the presence of film and media companies currently in occupation on the site and it is this opportunity we wish to harness and grow, in accordance with SHBC Economic Development priorities.
- 2.39 As a consequence, the proposed minor alteration of the previously designated MDS to a proposed Locally Important Employment Site (LIES) is a hugely wasted opportunity. The raising of its status to an SES would reflect the employment ambitions of the SHBC employment strategy. In any event, the restricted boundary of designation requires greater flexibility to deliver practicable redevelopment. The NP is clearly open to the opportunity and need to relax and expand employment designation by the inclusion of the Chobham Business Park on the opposite side of the A319. We merely seek parity of consideration to enable the creation of a new fit for purpose campus with the practical flexibility to re-develop and decant those existing tenants who may wish to remain.
- 2.40 The visual impact on the openness of the greenbelt would be minimal compared to the economic benefits available and the current collection of large buildings does not serve the purpose of greenbelt.
- 2.41 This has been the subject of detailed assessment which, confirms the Local Plan analysis that the Fairoaks site performs a weak greenbelt purpose, particularly in lieu of the Permitted Development Rights that the Airport enjoys.
- 2.42 To realise the Fairoaks development potential, is a rare opportunity as it is not inhibited by other important ecological sites and buffer zones or flood risk designations. Indeed, the site has ample capacity to increase the level of ecology at the site.
- 2.43 The benefits of providing modern, energy efficient buildings, moving out of aviation use, would also be to the significant benefit of climate change and air quality agendas. There could also be practical benefits for the locality by seeking traffic management and routing agreements through future re-development, rather than the current unrestricted situation.
- 2.44 This rare opportunity to amend the N Plan policies which would require the Council to agree that, on balance, there are exceptional circumstances which warrant the release of the economic growth potential of this site. This a lower policy test than a formal planning application which would otherwise need to demonstrate very special circumstances.

3.0 Formal Representations to CNP Draft Regulation 14 Plan

- 3.1 Land at Fairoaks is not located within any of the absolute environmental constraints which preclude much development in Chobham Parish. The absolute constraints (environmental) have implications for the availability of developable land. This demonstrates the importance of identifying sites that balance meeting employment needs with safeguarding environmentally sensitive areas or which contribute to the purposes of the Green Belt.
- 3.2 SHBC Local Plan Green Belt evidence demonstrates that the previously developed part of Fairoaks, is considered to provide no or a weak function to each of the five Green Belt purposes. Our own supporting documentation confirms this analysis and that Exceptional Circumstances exist at Fairoaks. These are:
- A) The wider Borough is heavily constrained with 74% affected by Green Belt or other ecological, environmental or flood risk constraints.
 - B) Employment need – the opportunity to provide additional high order jobs and contribution to the SHBC Economic Development Strategy.
 - C) A high proportion of Previously Developed Land (49ha).
- 3.3 The Neighbourhood Plan allocates Fairoaks Airport as a draft Locally Important Employment Site, However, it is considered more appropriate to be allocated as a Strategic Employment Site on the basis of its scale and economic influence. It is equally comparable to other sites identified in the plan as SES.
- 3.4 There is currently little available office, light industrial or industrial floorspace available in the eastern part of the SH Borough. The N Plan does not allocate any additional employment area, rather relies on redevelopment of existing sites to meet the demand for space. ADP consider this assessment unrealistic.
- 3.5 Additional employment land is required to accommodate the anticipated economic growth just within the Borough (if the wider needs of neighbouring local authorities or Greater London were to be considered, the need would be greater). An Employment Market Assessment demonstrates it is unrealistic to presume this need will be met by existing employment sites, as it is unclear if and when existing employment land will become available and whether one use can be easily substituted with other uses such as offices, warehousing or more specialist activities such as studio/film production. This is particularly the case when sites like Fairoaks are shown as being retained in the Green Belt.
- 3.6 The employment area, and the wider land at Fairoaks should be released from the Green Belt as exceptional circumstances are present and would help the wider SHBC to meet its employment needs.
- 3.7 Policy CH8 should be amended in order to meet the need for an additional employment land at Fairoaks Airport and be included as an enlarged SES designation.
- 3.8 The Council aim to support the growth and retention of existing businesses and inward investment is not sufficiently ambitious and should be more positive in creating opportunities to support economic growth and investment.

- 3.9** The Locally Important Employment Site which at the Fairoaks site extends to approximately 3.57 hectares (8.82 acres).
- 3.10** ADP request the proposed employment area be increased in size to approximately 11ha. The proposed increase in the size of the employment area would enable greater flexibility in the type of employment provision which could be made on site and provide suitable opportunities to meet constant demand for employment and in particular film and media space at Fairoaks.
- 3.11** The proposed employment allocation area would be used for the following uses: Classes B2, B8 and E (g), including the opportunity for the use of land and buildings within the defined area as purpose built media/film studios.
- 3.12** ADP request that additional designation is allowed to facilitate the de-canting and retention of those existing business who wish to remain whilst re-investment and new purpose build is achieved. This is an important practical point in securing and protecting as much existing employment at Fairoaks otherwise displacement or loss of employment is inevitable.
- 3.13** Neither the Regulation 18 Local Plan or this Neighbourhood Plan is opposed to expansion of the employment land at Fairoaks beyond what is currently the defined MDS in the current local plan. It is evident that land across the A319 has been included in addition to the previous MDS, together with additional open areas around the building. If this is acceptable in green belt terms then there is no logical reason why land associated with the buildings at Fairoaks could not also be allocated for additional employment use to give breathing space and permit practical redevelopment.
- 3.14** If the land and buildings were to be retained in the Green Belt, then such proposals would need to demonstrate Very Special Circumstances, which would be onerous, particularly when the land does not contribute to the purposes of the Green Belt and where there is no reason to keep it permanently open.
- 3.15** Even on the basis that the employment area was only to remain at the scale and extent shown in the N Plan, at 3.57 hectares (8.82 acres) the size of this site has the scale, strategic location and economic influence that would make it appropriate to be designated a Strategic Employment Site.
- 3.16** Furthermore, on the basis that additional land is allocated for employment use at Fairoaks, the size of the allocation site would represent one of the largest employment allocations in Surrey Heath. The proposed employment allocation at Fairoaks would constitute a Strategic Employment Site and the proposed employment area would enable greater flexibility in the type of employment provision which could be made on site and provide suitable opportunities to meet constant demand at Fairoaks. This is entirely consistent with the growth ambitions of the SHBC Economic Development Strategy.
- 3.17** It is requested that Figure 16 is amended to reflect a wider SES Designation and the text of Policy CH8 be amended to reflect Fairoaks as an enlarged employment area and SES.

3.18 Policy CH12 Locally Significant Views- 8

The purpose of this policy is stated as:

7.39. This policy sets out a series of views in and across the parish, which have been identified by the community as being important to safeguard. The policy seeks to safeguard the views from inappropriate development.

- 3.19 It is noted that of the 8 identified views, 7 relate to views within Chobham Village itself. Only view 8 lies outside of the village, at Fair Oaks and it is surprising that the Parish contains no similar worthy views other than the one identified here.
- 3.20 This appears to be an opportunistic designation which seeks to inhibit the development ambitions at Fair Oaks, particularly in regard to the current planning application for two film studios.
- 3.21 In any event, the view identified is not supported by any rational landscape impact appraisal and appears to be illogical in selection of the viewpoint itself.
- 3.22 Furthermore, it should be noted that this view which is proposed to be protected, is directly impacted by an extant prior notification exemption for a large hangar building in the location shown below in red dotted line.



- 3.23 For this reason, the proposed protected view should be deleted from the plan as it is already compromised by a large building which has extant permission to be erected and is likely to be constructed should be current studio application fail.
- 3.24 A formal objection is therefore raised to Policy CH12 in respect of View 8 and it is requested that this be deleted.

ENDS

