

17th January 2019

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Representative No. 1885

Runnymede 2030 Local Plan Examination,
Statement reply to the Planning Inspector's document ID/10 re Matters and Questions for
the Stage 2 Hearings – Matter 5: Longcross Garden Village and Runnymede's policies SD3,
SD10 and related policies and texts and the Longcross parts relating to Matter 10:
Infrastructure Provision, especially para. 10.4

Longcross Garden Village

There should be no net gain in the number of people visiting Chobham Common as a result of this development but this aim is compromised because for the new homes planned for the western half of the Longcross South development, the Chobham Common part of the Thames Basin Heaths SPA will be nearer to their homes than the existing SANG at Chertsey Common. As I established in my representations for Stage One, Matter 3 of this inspection in November 2018 regarding the Planning Inspector's subject of "mitigation", despite AECOM's HRA and Runnymede Council legal representative's position. The existing eastern SANG (Para 5.94 of the Local Plan) will not intercept the new Longcross Garden Village resident and dog walker who live nearer to Chobham Common than to the already established SANG at Chertsey Common from getting to Chobham Common and allowing his or her dog off the lead to disturb the ground nesting birds, for which this site is internationally designated. This is especially the case if walking and cycling routes are established as mentioned in Stage 1 of the Inspection and as contained in para 5.93 of the Vision for Longcross Garden Village, which if these take users to or across Chobham Common to other locations, will compromise the provision of the SANGS. Such routes if created will allow others to walk more easily with their dogs which would be facilitating extra access to the Common, the exact opposite of what should be done. Such proposals are further damaging when framed by statements such as that in the last part of paragraph 107 of the Runnymede 2030 Local Plan that "will deliver a range of sustainable and active travel choices should they need to travel further afield."

Such travel choices won't be sustainable, this will result in further damage to the adjacent parts of the Thames Basin Heaths SPA. This extra access and the likely extra artificial light provision, even for old people's homes as mentioned in para 5.96, will damage the heathland of Chobham Common which needs to stay as dark as possible for wildlife to thrive. This provision of old people's homes or employment development suggested for

the former Longcross Barracks area at the extreme west of the Longcross South site is noted as not being adverse at para 8.49 of the April 2018 version of Habitats Regulations Assessment. Again this belies whether AECOM really understand the impact of artificial light on heathland sites and wildlife populations, it is absolutely damaging and will be especially so in this location.

Natural England apparently supports this anomalous situation with regard to this limited SANG provision at Chertsey Common but the current Government's statutory adviser on nature conservation and recreation is compromised because it is no longer independent, as it was before 2011. Have Natural England even visited the site, I doubt it? What are the "net gains in biodiversity" referred to in the vision statement in paragraph 5.96 in the usual glib way without any substance. This so-called "locally-led garden village" as promoted by our current central Government has been taken out of the Green Belt and is I estimate fifty per cent green land and thus not a sustainable development. It is not all brownfield land as it formerly composed a military vehicle test-track with a few odd buildings and several hard standings and a large parkland house used as an "Officers Mess" and latterly as a film set. This is Barrow Hills House, a bat roost was recorded in the roof of this house in May 1992. Because of its relatively undisturbed location and the size of the house this is very likely still to be present. Before the developers, Crest Nicholson put out grandiose plans for this building as they have on their Longcross web-site as follows:

"BARROWHILLS HOUSE

The Grade II listed house will be restored and converted into homes. The former courtyard block will be recreated and the grounds improved."

They need to thoroughly survey the all the buildings on the test track site with a properly registered bat survey organisation and then they must survey the whole of the Longcross South site, including the old trees which are likely to support summer bat roosts. So for these surveys to be comprehensive they must be done at different times of the year. If these bat surveys have been done why are they not present on the Local Plan website of RBC? Have Natural England even mentioned the bat populations of the site? No, because of the commands of DEFRA they are not doing their job properly. There is a whole list of bird and flower species and mammals that I am aware of, which are known from the North and South sites that should have been protected by Natural England under the Wildlife and Countryside Act 1981, if they have been or are doing their job properly.

This is an extensively wooded site. You only need to look at an Ordnance Survey map and to look over the site from its' exterior boundaries as I have recently done to see this. But in its southern boundaries it has extensive biodiversity rich woodlands because many of the trees, especially beech and oaks e.g. the trees numbered 1900 to 1911 for example, are old and decayed and some others have fallen down adding fungal elements to the biodiversity. Decay in old trees supports a larger population of invertebrates the food of birds, bats and other animals indirectly, so this development will damage these local wildlife populations if these trees are felled. The Runnymede 2030 Local Plan fails to

protect the local environment and will result in the loss of hundreds of mature trees, many of which contain rot holes and cavities that support and feed a dead wood fauna that supports the local bat population so there will be a biodiversity loss, this is certainly not the sustainable development or biodiversity enhancement that it is claimed to be. Another Runnymede 2030 Local Plan EE9 and EE10 policy failure. I do not consider that this Longcross South site has any exceptional reasons to take it out of the Green Belt boundary. All the issues and reasons I cover in this submission should have kept it in the Green Belt with a prescription not to build such a large isolated development.

Most importantly of all, this site is immediately adjacent to an internationally designated heathland site, a part of the Thames Basin Heaths Special Protection Area (SPA) and Special Area of Conservation (SAC). We know that since the current Conservative Government came into power Natural England (NE) has been subjugated from its original role and now has to support economic development via what the Department of Environment, Food and Rural Affairs (DEFRA) wants to be done, not what is good for nature conservation or wildlife species. This conflict of roles means that Natural England has “its’ hand tied behind its back with a gun to its’ head” metaphorically. This is never more clear than when you examine two particular DEFRA produced or sponsored documents, the first is “Natural England Framework Document 2017”. In paragraph 2.4 we can see that NE exists to not only promote nature conservation and promote biodiversity but also to “contribute in other ways to social and economic well-being” [of human beings]. In paragraph 2.6 we see that this Government’s ambition is for Natural England to help “to develop laws, policies and plans and delivering action to achieve Government’s ambition of making England a great place in which to live” [for humans]. This last paragraph should have ended with the words “for our British wildlife species” but it does not because the current Government via DEFRA does not understand what NE needs to do, which is to protect and defend our rich wildlife sites from development proposals like this so-called “garden village” and the associated damaging Runnymede 2030 Local Plan.

The other document is just as bad as the former and it is, “Conservation 21 Natural England’s Conservation Strategy for the 21st Century” produced in 2016 apparently without an author so that no one can be accountable for it. This the worst document I have ever read and finishes with such classically bad statements as, “By focusing on a landscape scale, listening to people and taking them with us, and enhancing natural capital, we believe we can play our part in reversing the declines in biodiversity, and in 25 years, enjoy a healthier environment that delivers more for people and the economy.” We see the result here today in Natural England and DEFRA’s support for this damaging development all founded on so-called “belief” of the current Government which actually shouts out loud “expediency” and despite all its “spin”, it is apparent that wildlife does not matter to this Government. The National Planning Policy Framework (NPPF) as published in 2012 (which I understand is the version to be used for this inspection?) stated that in paragraph 109, that “The planning system should contribute to and enhance the natural and local environment by: minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to

halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures". The Runnymede Local Plan 2030 and its' Habitats' Regulations Assessment by its' promotion and incorporation of the Longcross Garden Village by its location and proximity to Chobham Common SPA as a part of the Thames Basin Heaths does not achieve this. It will, as currently configured, cause an overall decline in biodiversity unless the changes I have called for in this submission are made. Policy EE9 is not being properly supported.

Additionally the developers of Longcross North are already supporting another anomaly in that I have recently learned by personal communication that they are not informing all occupants of this development where the SANGS are, that they have created under the Thames Basin Heaths Joint Strategic Partnership Board Delivery Framework, that Runnymede Borough Council signed up to in 2008. Also of concern is the following:

- Firstly those occupants in Assisted Ownership properties are not being informed by Crest Nicholson of where the on-site Longcross North SANG is;
- There is also no signage on the estate and public roads locally to indicate where the two existing SANGS are for any resident;
- Finally there is no leaflets to explain that residents with dogs should go preferably to these sites and not to the adjoining National Nature Reserve nearby on Chobham Common.

I checked by asking some of the residents of Firefly Close and Cromwell Road on Longcross North last June (2018) if they knew where the SANGS were to take their dogs for a walk instead of the Thames Basin Heaths site of Chobham Common. They did not know what I was talking about! If this same attitude prevails on Longcross South then the Chobham Common part of the Thames Basin Heaths SPA and SAC will be seriously damaged. This will be compounded by the failure to provide a specific large on-site SANG on the Longcross South site at either its western end or preferably in the old trees biodiversity area along and outside the existing high perimeter fence inside from but bordering the B386, Longcross Road. This is due south of Barrow Hills House just east of the areas outside the potential development site (brown hatching on the local plan map) at SU988653 east to SU992654.

Currently this rich area, rich because it is unmanaged, is proposed to become an area of what the developers, Crest Nicholson have titled "Discrete Boundary Plots" comprising "individual homes will be built along the boundary of the site, in keeping with existing development at Longcross" as taken from their website. It would be far, far better if this area was converted to an on-site SANG or greenspace and to help shield Chobham Common from excessive light spread. I note that in RBC's appeal for Scoping Opinions for the Longcross South site in 2017, the Surrey Bat Group assumed that all this fringing woodland would be retained, it is an absolute disgrace that it is not going to be. This new SANG is additionally necessary as on the day of my recent visit, this January, the car park for the Chertsey Common SANG had eight cars of dog walkers already parked in it (none

were from the Longcross North site!). This leaves just two parking spaces and a disabled parking space for all the new resident of the so-called Longcross South “garden village” should they even decide to get in their cars to take their pets for a walk!

Thus without a defined provision of a new dedicated western or southern SANG marked on the map contained in the Local Plan document at page 53 and marked as Figure 3, I cannot see that all the potential dog walkers of Longcross will be satisfactorily provided for to protect the Thames Basin Heaths. The verbal assurance of the Barton Willmore representative as we had in Stage One of the inspection or of the Runnymede Borough Council staff members and Counsel for the Council just will not do, this plan as it currently stands is unsound and non-compliant with the NPPF and the Conservation of Habitats and Species Regulations 2017. **Ms Travers, I ask you to insist in your final report on this Inspection that a new SANG area, on site and in the western or southern sectors of the site is provided.** If this is the existing woodland as I identified in the last paragraph this will help screen the stray light emanating from the development to be shielded from spreading to Chobham Common since the mature trees present are higher than standard height lamp-posts in developments. Runnymede 2030 Local Plan policy EE10 will fail here if there is light spread onto the Thames Basin Heath’s site because these trees have been felled or a new western or southern SANG is not provided.

So in site allocation terms this site is a bad site allocation, if I have to suggest an alternative solution this would be not to remove sites adjacent to National Nature Reserves out of the Green Belt. This site will mainly provide luxury developments as can already be seen in parts of Longcross North. Instead replace such proposals with more housing in place of shopping units in third tier town centres like Addlestone, as we now know that many people (21% of UK population) are switching to on-line shopping.

I already know, from my experiences here in Bordon, Hampshire where a similar military site has been developed for housing. Here there was a large bat population of many species which resulted in two bat hotels being built for them as mitigation for the loss of their roosts. Has this mitigation been effective? No is the answer, **Natural England does not maintain a post development monitoring programme.** The developers of the former Louisburgh Barrack’s site do not care enough about the mitigation sites as they have let them fail due to vandalism, in both cases fencing surrounding them has been damaged allowing access by people. Also they have removed many of the former surrounding trees exposing them to light, the very thing that bats avoid. The local council, East Hampshire District Council also failed to ensure that the mitigation remained as mitigation with the effect that someone moved an old chair into one of the mitigation bunkers and then set it on fire. So the organisation, Natural England as instructed by our current Government issues European Protected Species’ licences allowing bats to be disturbed but then fails to put in any post development monitoring in to ensure their populations are not damaged. **So AECOM’s position that this Longcross development will have effective mitigation via SANGS and various provisions for wildlife, and Runnymede Borough Council’s reliance on this mitigation and its EE9 and EE10 policies is misplaced, unless there is a proper**

independent biological organisation to monitor the mitigation post development, otherwise damage and loss of wildlife populations will occur.

I note that in the Longcross South web-site brochure, as supported by this Runnymede 2030 Local Plan that the developers state that they will build roosts for bats. But to be effective mitigation these built roosts must be in place before the houses are constructed and before Barrow Hills House is altered and the roosts need to be well away from cats, (cats kill bats if they can get hold of them) and children (children can be little vandals, e.g. Bordon) and situated in places that are darkened by tree cover which will NOT be subsequently changed by development. They must be securely fenced off with no disturbance by people and their damaging presence. **This concept that you can bring wildlife and people together is not correct for every species and just too much housing is proposed currently in this Local Plan on the Longcross South site. Runnymede 2030 Local Plan Policy EE9 will fail here unless any built bat roosts are monitored after construction to ensure the development does not encroach on them and that they are secure.**

I ask that the current Planning Inspection determines that AECOM's findings and screening out decisions in all of their various versions of Habitats Regulations Assessments and Appropriate Assessments should be declared as not justified because the evidence base for wildlife issues is not comprehensive and no alternatives to the large Longcross South site have been put forward. I also ask as well that the Runnymede 2030 Local Plan is determined as non-compliant with the Conservation of Habitats and Species Regulations 2017. This because the SANG mitigation proposed for the Longcross South development is not to the high standard required for such a high profile site right next door to an SPA. The Conservation of Habitats and Species Regulations 2017 at Section 43 under the "Protection of certain wild animals: offences" section states

"43.—(1) A person who—

(b) deliberately disturbs wild animals of any such species, [a European protected species] is guilty of an offence."

In my opinion Runnymede Borough Council, Natural England and the developers will all be encouraging that offence to be committed by failing to provide an effective SANG in the western or southern parts of the Longcross South site. Thus in this case the Runnymede 2030 Local Plan will not be legally compliant.

Under Section 5.7 regarding the Runnymede 2030 Local Plan objectives this Plan does not sufficiently support the biodiversity objectives at item 9 under the heading "Enhancing Our Environment" since Central Government's own nature conservation organisation, Natural England plus Runnymede Borough Council put those objectives and wildlife assets at risk by failing to have a comprehensive mitigation policy with regard to SANG provision and by failing to ensure their policies steer people away from using Chobham Common for their leisure. Also under item 10 by taking a sensitive location out of the Green Belt, namely Longcross this plan fails to properly protect the full extent of the Green Belt.

The proposed Longcross Garden Village on the former DERA South site contained in the Runnymede 2030 Local Plan will increase dramatically the disturbance pressure potentially by 7000 extra people (1750 x 4 persons) having immediate and probably preferred access to Chobham Common SPA. A better plan and solution to the disturbance problem is needed, nothing AECOM has written in its various HRA's improves this potentially bad situation. I therefore continue to ask as of January 2019 that the Planning Inspector, Mary Travers finds at this current public inspection of the Runnymede 2030 Local Plan unsound as a consequence.

Chobham Common has already been damaged in recent years since Natural England determined that all National Nature Reserves should become "access" areas for people, a disastrous and stupid decision. Consequently many of the bare soil tracks that previously supported insect species named in the original SSSI citation have been hard surfaced for people, damaging populations of species like the Mottled Bee-fly and the solitary bees and wasps that nest in the bare ground of the tracks and footpaths. With the Longcross South proposals there is the very real danger that the whole Chobham Common site will end up being managed for people's leisure instead of its' special wildlife for which it is internationally designated. Post BREXIT this is a very worrying possibility. Policies SD4 and especially SD10 by encouraging cycling on Chobham Common will be particularly damaging as this activity results in the continuous churning up of bare ground tracks and footpaths to the detriment of the invertebrates and sand lizards that nest in the bare sandy ground of lowland heathlands. These species need the holes they dig as breeding sites to remain accessible each summer with minimal disturbance, cycling by humans destroys this.

The 5.5 hectare of green space corridors proposed on-site on the Longcross South site with footpaths, are not large enough for loose dogs off the lead to properly exercise, and from the initial plans many of these corridors will be too narrow and near to roads to provide an effective alternative to Chobham Common. If as the Longcross South website brochure suggests that these "green" areas will also be providing sports pitches and facilities and children's play areas, than these areas cannot provide this dual use for dog walking as well, as these are mutually incompatible uses. A large on-site SANG will help reduce lighting spread and other urbanisation effects associated with this development and identified by AECOM elsewhere in their various HRAs for this Runnymede 2030 Local Plan. Any visible lighting spread onto Chobham Common SPA will damage this site, from their statements I am not sure this fact has registered with AECOM's HRA writers.

The National Planning Policy Framework (NPPF) further states at paragraph 118 that, "When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

● proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) – Chobham Common - should not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest”.

Furthermore paragraph 118 also states, “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.”

This is not the case here so what really needs to be done is for the Longcross South site to be removed from the Local Plan, as currently formulated it is not deliverable. Unless a better and improved SANG scheme of provision can be implemented, as I have indicated in this submission statement and the amount of housing can be reduced so that the woodlands and ancient trees and their stumps are retained within the hundred metres perimeter north of and parallel with the A386, Longcross Road. I consider there is real doubt as to whether this plan can be delivered without damaging the adjoining Thames Basin Heaths.

This site as with all woodland sites removed from the Green Belt for this Local Plan are additionally damaging because mature trees and woodland are the lungs of London. Oxygen as a bi-product of photosynthesis is essential to all life and we discount this at our peril in this overpopulated country. The pretence that this local plan is “green” needs to end, it certainly is not. Neither is it “sustainable development”. I note that in paragraph 2.1 of the Runnymede 2030 Local Plan it is stated that, Section 62 of the Planning and Compulsory Purchase Act (2004) requires LPAs to prepare a plan for their area to be known as a local development plan and that Section 62 (6) of the Act confirms that Local Authorities must carry out an appraisal the sustainability of the plan. The Brundtland definition of sustainable development was “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”. This Runnymede 2030 Local Plan thus damages the local “natural capital” and needs be found in this inspection to be “unsound” as a consequence. This also means that this Plan is not sound because Policy SD10 is compromised by the proposals for the Plan’s implementation. The felling of the large number of trees at Ottershaw and Longcross for this Runnymede 2030 Local Plan and its proposals is not sustainable development and should not be dressed up as being so.

Stephen R Miles, 17th January 2019