

5 September 2025
250905 Land at Fairoaks - Reps to CNP



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Dear Sir/Madam

REPRESENTATIONS TO THE CHOBHAM NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION (REGULATION 16) IN RELATION TO LAND AT FAIROAKS AIRPORT – ON BEHALF OF VISTRY GROUP PLC AND ADP FAIROAKS LTD

Introduction

- 1.1 These representations to the Regulation 16 Chobham Neighbourhood Plan (CNP) have been produced on behalf of Vistry Group and ADP Fairoaks Ltd in respect of Land at Fairoaks Airport ("the Site") (See **Appendix 1**). A Collaboration Agreement exists between ADP Fairoaks Ltd (owned by Westcore Europe) and Vistry Group, to progress the redevelopment of Fairoaks Airport, which is promoted for a new settlement.
- 1.2 ADP and Vistry (hereafter referred as 'the Parties') made separate Regulation 19 representations to the Surrey Heath (SHBC) Local Plan – and have prepared a set of Examination Statements jointly, and intend to appear jointly at the SHBC Hearings to outline extensively why the Local Plan should be found unsound, and ideally modified.
- 1.3 The Neighbourhood Planning Group will be aware of the previous planning applications on the Site made by the landowners (Surrey Heath Borough Council (SHBC) application ref: 18/0642 and Runnymede Borough Council (RBC) application ref: RU.18/1615), alongside the promotion of the Site by Vistry (formerly known as Countryside), including to the Regulation 18 and, more recently, the Regulation 19 Draft Surrey Heath Borough Council (SHBC) Local Plan. The Parties intend to appear jointly at the SHBC Hearings to outline extensively why the Local Plan should be found unsound, and ideally modified, to seek the allocation of Fairoaks Airport for a comprehensive new settlement.
- 1.4 Appended to these representations are the following:
 - Appendix 1: Framework Plan (September 2024)
 - Appendix 2: Representations SHBC Submission Local Plan (September 2024). The relevant appendices to the Local Plan representations are separated out as appendices below.
 - Appendix 3: Vision Document – A Vision for Fairoaks Garden Village (September 2024)
 - Appendix 4: Green Belt Exceptional Circumstances in Surrey Heath (September 2024)
 - Appendix 5: Employment Comparison Plan (September 2024)
 - Appendix 6: Employment Market Update and Employment Market Assessment (September 2024)
 - Appendix 7: Preliminary Landscape and Visual Appraisal Update (August 2025)
- 1.5 The Vision Document (Appendix 3) for Land at Fairoaks provides the masterplanning analysis for a potential new settlement of approximately 1,600 homes (including c.640 affordable homes), an employment area of 14.5 hectares, a primary school and local centre forming a community heart, gypsy

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and traveller pitchers, sports hub and the potential for up to 57 hectares of Strategic Alternative Natural Greenspace (SANG). This redevelopment would bring substantive local, community and environmental benefits to the area, with built development being solely being located on 49ha of Previously Developed Land.

1.6 It is recognised that given the size of the promotion at Fairoaks Airport that it would form a 'strategic' site / policy. As a result, its allocation would be at the Local Plan rather than the Neighbourhood Plan level. These representations therefore, whilst promoting the Land at Fairoaks Airport, largely seek to ensure the CNP does not preclude / prejudice any allocation being included within SHBC's emerging Local Plan through the Examination process, due to commence this September. As a result, draft CNP Policies CH3 and CH12 might need further modification arising from the outcome of the emerging Local Plan process. Whilst the Land at Fairoaks Airport is not currently identified within SHBC's submission version Local Plan, it is included as an 'alternative' site within the SHBC Sustainability Appraisal Growth Scenario 2.

1.7 The NPPF was also updated in December 2024 and it is this new NPPF that the NDP will need to be assessed against. Although a number of changes were made to the NPPF that require closer alignment of plan policies between NDPs and Local Plans as well NDPs needing to respond more directly to housing need calculations (which for SHBC have significantly increased under the new Standard Method calculations), it is the introduction of the Grey Belt which is most pertinent here.

1.8 As set out in the 2024 NPPF: -

"grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

1.9 **Appendix 7** to this letter sets out that Fairoaks Airport will be delivered on 49ha of PDL, with this area of Green Belt not strongly contributing to any of purposes (a), (b), or (d) in paragraph 143. Although it is ultimately for SHBC to allocate Fairoaks Airport for development, it is important that the Chobham NDP recognises the national planning policy context and the Government's desire to see more homes developed on poorly performing Green Belt land.

Basic Conditions

1.10 The National Planning Policy Framework (NPPF) requires Neighbourhood Plans to meet 'basic conditions' and other legal requirements (paragraph 37). Paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) sets out the 'basic conditions', confirming Neighbourhood Plans must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Have special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest it possesses;
- Have special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;
- Contribute to the achievement of sustainable development;
- Is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- Not breach, and is otherwise compatible with EU obligations

1.11 We acknowledge the Basic Conditions Statement that has been prepared in June 2025. However, as was the case made within Vistry's representations to the Regulation 14 CNP consultation, it is Savills' view that preparation of the CNP ahead of the emerging Draft SHBC Local Plan being Adopted will make it difficult for the CNP to be in 'general conformity' with the strategic policies, as these will no doubt change from those set out within the current Development Plan and Regulation 18 Local Plan. As a

result, the CNP policies could well become 'out of date' if they differ to those within the SHBC Local Plan once adopted. The CNP is therefore premature in its production.

- 1.12 This position is reinforced, as the Draft SHBC Local Plan does not allocate a housing requirement for the Chobham Parish Council area yet. The Basic Conditions Statement (June 2025) does refer to housing needs (specifically housing mix) set out in Policy CH2 and the policy text, and our comments on this policy are set out below.
- 1.13 Once it is adopted the SHBC Local Plan should include a requirement in line with NPPF paragraph 69. This is being considered at the forthcoming Examination in respect of Matters 2 and 3 – noting that the Inspector is asking questions in respect of the plan period (2019-38) and the applicable housing requirement over that, or another period.
- 1.14 **(Objection) - The CNP should not progress to adoption until the Examination in Public of the emerging Draft SHBC Local Plan and any further necessary consultations have concluded. Options should be considered in the interim, to ensure the CNP is adaptive to the progress of the Local Plan.**

National Policies and Guidance

- 1.15 The 'basic' condition requiring the CNP to contribute to the achievement of sustainable development, reinforces the purpose of the planning system, which is identified in the NPPF. Paragraph 8 of the NPPF sets out overarching objectives to achieving sustainable development:
 - a) **An economic objective** – The CNP needs to support growth, innovation and improved productivity
 - b) **A social objective** – The CNP needs to support strong, vibrant and healthy communities
 - c) **An environment objective** – The CNP needs to protect and enhance the natural, built and historic environment including making effective use of land, improving biodiversity and mitigating and adapting to climate change
- 1.16 It is Savills' view that as currently drafted, the CNP fails to do this. The Draft CNP as currently drafted just maintains the status quo. This also reflects our comments made to the SHBC Local Plan (**Appendix 2**).
- 1.17 As set out in the Planning Policy Guidance (PPG ID Ref: 41-005-20190509), *"plans should be prepared positively, in a way that is aspirational but deliverable"*.
- 1.18 **(Objection) - The CNP fails to support economic growth and fails to support strong, vibrant communities. There is an opportunity at Fairoaks Airport to support expansion of the economic area beyond that identified as a 'Major Developed Site in the Green Belt'. See further detail within the Draft Policy CH8 section. At the very least, the CNP should be considering an approach to maintain/ enhance the vibrancy of the employment offer at Fairoaks Airport, which, as indicated by the evidence base enclosed, is still to be maintained as part of the new settlement promotion.**

Chobham Neighbourhood Plan Draft Policies

Policy CH1 – Location of Development (Comment)

- 1.19 It is recognised that the NDP does not allocate additional sites beyond those set out in SHBC's submission version Local Plan. As identified in this letter above, it is recognised the scale of Land at Fairoaks Airport, means its allocation would be a 'strategic' policy, and hence would be need to be at a Local Plan level.
- 1.20 Notably, Figure 3 on page 21 of the draft CNP, shows Land at Fairoaks Airport as largely unconstrained compared to much of the land within Chobham Parish.

- 1.21 Paragraph 4.8 sets out the parameters which are meant to support SHBC's proposed growth strategy set out in the emerging Draft Local Plan. The first parameter is prioritising the use of brownfield land in the Parish. The Site at Fairoaks contains 49 hectares of brownfield land, otherwise known as PDL, which is underutilised at present.
- 1.22 As set out within our representations to SHBC, Exceptional Circumstances (EC) need to be demonstrated through evidence for amending the Green Belt boundaries. which was not available during the last emerging SHBC Local Plan consultation. SHBC has now stated that EC do exist, and has proposed the removal of Chobham village from the Green Belt – this is shown on the Pre-Submission Surrey Heath Local Plan Policies Map (August 2024).
- 1.23 Savills view is that there are EC to amend the Green Belt boundaries in Surrey Heath to also allocate land for development at Fairoaks Airport (see **Appendix 4**). Given Land at Fairoaks would be considered a strategic policy and as a result, the CNP will not amend the Green belt boundaries, these Exceptional Circumstances are not reiterated in these representations.
- 1.24 **(Comment) - It is vital that the CNP does not preclude development coming forward within the SHBC Local Plan, hence Savills is supportive of Section 2e) of the draft Policy. The need for allocations in the CNP should await further progress with the emerging Draft SHBC Local Plan.**

Policy CH2- Meeting Local Housing Needs (Comment)

- 1.25 The Chobham Housing Report (March 2023) supporting the draft CNP indicates higher than average local house prices, and a low proportion of smaller homes. It does not identify an overall housing requirement for Chobham, however it does specify a shortfall of 120 dwellings for affordable housing for sale.
- 1.26 Policy CH2 focuses on housing mix. It is noted in the pre-text to the policy that based on 91 dwellings, only 36 affordable dwellings would be provided in Chobham over the plan period (para 4.23) compared to an estimated need of 120 dwellings (para 4.20). Savills' view is that number is significantly higher than 120 dwellings, but even on their own evidence, the housing provided in Chobham is not going to meet the affordable need. This demonstrates the need for a greater level housing to be delivered in Chobham.
- 1.27 **(Comment) – The Parties have no specific comments to make it relation to the policy wording itself, however consider that the Land at Fairoaks would enable a greater housing mix and more affordable homes to be provided in line with draft Policy CH2, especially if Land at Fairoaks Airport is deemed to be Grey Belt and 50% affordable housing is required.**

Policy CH3 – Character of Development (Object)

- 1.28 The Land at Fairoaks Airport is designated within the 'Rural Hinterland' Character Area. The majority of the Site does not reflect the key landscape or settlement characteristics of this Character Area, particularly the previously developed part of the Site as recognised in the Landscape Appraisal (see **Appendix 7**).
- 1.29 Notably, this policy is not supported by any up to date landscape evidence. Reference is made to the list of evidence base documents on the CNP website, this refers to the Surrey Landscape Character Assessment dated 2015. Significantly, there is no reference in this document to key views. Savills dispute the key view 8 Views over Fairoaks (see further detail in paragraphs 1.39-1.43 below).
- 1.30 Draft Policy CH3 Section 2 currently is worded as "Development proposals should conserve and, where practicable, enhance the character of the Conservation Area or Character Area in which it is located...". It is important for the Policy to be flexible and to recognise that that there are exceptions within the Character Areas. Savills have provided suggested amended wording below.
- 1.31 In our previous representations to the CNP consultation, we objected to the reference to Policy CH12 and the requirement for development proposals to demonstrate how they will not have a significant detrimental

impact on the local views. Policy CH3 no longer refers to Policy CH12 and local views. A full response is provided to Policy CH12 further below in this letter, however, Land at Fairoaks Airport is designated as Settled and Wooded Sandy Farmland LCT within the LVIA (see **Appendix 7**) which is noted as predominantly farmland with urban influence and activity from settlement and transport and only heavily wooded in places, as opposed to 'rural hinterland' characterisation set out in the CNP. With the eastern half of the site to remain undeveloped, the LVIA sets out a range of mitigation and enhancements that a planning application at Land at Fairoaks Airport would bring to enhance the landscape setting in this area.

1.32 **(Objection)** – Amendment policy worded suggested below: -

Amendment to Draft Policy CH3

- 1) *"Development proposals should conserve and, where practicable, enhance the character of the Conservation Area or Character Area in which it is located, unless the proposal is located on land that does not reflect those particular characteristics".*

Policy CH4 – Energy Efficient and Design (Object)

- 1.33 Local plan makers should not go beyond government building regulations in setting energy efficiency targets. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale. Those rationales should meet a number of objectives, including that the development should remain "viable", and the impact on housing supply and affordability is considered in accordance with the NPPF. Councils must also ensure any additional requirement is expressed as a percentage uplift of a dwelling's target emissions rate, calculated using a specified version of the standard assessment procedure. In addition, the policies should be applied flexibly where the applicant can demonstrate that meeting the higher standards is not technically feasible.

- 1.34 **(Objection)** – The CNP goes beyond government building regulations without any supporting evidence including viability testing, the policy is therefore unjustified.

Policy CH8- Supporting Local Employment Opportunities (Object)

- 1.35 This Policy seeks to replicate draft policy ER3 of the emerging Draft SHBC Local Plan in allocating part of Fairoaks Airport as a Strategic Employment Site. We have included Vistry's representations to the SHBC Submission Local Plan (September 2024) at **Appendix 2**. Vistry (and now the Parties) objected to the emerging Draft Local Plan, on the basis that:

- The employment area should be removed from the Green Belt because National policy makes clear that land should be included in the Green Belt where it meets the defined purposes. At Fairoaks, which includes Previously Developed Land, the inclusion of land identified for employment use (and the wider area which is proposed by Vistry for residential development with supporting uses) does not meet these purposes; and;
- The total site area for the proposed employment area at Fairoaks be increased in size to 14.5 hectares (see **Appendix 5**), on the basis of demonstrated employment need (see **Appendix 6**).

- 1.36 In order to meet the basic conditions, the CNP needs to be positively prepared and contribute to the achievement of sustainable development. In order to do this the CNP needs to support a strong and resilient economy.

- 1.37 The Strategic Employment Site at Fairoaks Airport amounts to 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 to deliver a new fit for purpose employment campus, including for opportunities in digital technology, film and

media output, and positive discussions have taken place with the British Film Commission on the potential for a media / film campus at Fairoaks Airport.

- 1.38 A redevelopment of the employment site can address the intention for Fairoaks Airport to contribute towards an enhanced Film and Creative Arts Industry as set out in the Surrey Heath Borough Council Economic Development Strategy 2023-2028 by maximising re-use of brownfield land, regenerating a key employment site and support business growth, all whilst encouraging innovation and inward investment. An increased Strategic Employment Site to 14.5 hectares to allow any existing business to remain whilst re-investment and new employment floorspace is delivered.
- 1.39 The Parties object to Policy CH8 for the same reasons, as those identified in paragraph 1.31 above.
- 1.40 In addition, the specific wording of Section 5d) is of concern to the Parties, as the employment site itself can operate without the wider airport site and therefore there is no need to link this policy to the function and operation of the wider site. The tenancy base at Fairoaks Airport has changed from limited and low density aviation employment and related occupiers, to a range of sectors owing to its commercially attractive location. This industries include studio / film production, professional services, IT consultancy, food / catering, engineering, creative/arts, medical and others. Only 10 of the 67 tenancies at the Fairoaks Airport employment site have any association with aviation activity, whilst there are 6 tenancies associated with film or tv. Just 2 of the tenants are dependent upon the runway and aerodrome itself.
- 1.41 The employment site could, for instance, come forward with a mixed-use proposal as demonstrated in **Appendix 3**.
- 1.42 **(Objection) – Policy CH8 of the CNP mimics Policy ER3 of SHBC’s submission version Local Plan, which does not remove the Strategic Employment Site at Fairoaks Airport from the Green Belt. There is no need to link the function of the Strategic Employment Site to the wider function of the site.**
- 1.43 The various supporting maps and figures would need to be adjusted to reflect the employment designation and any alteration to the Green Belt proposed by the emerging Draft Local Plan. This is a further reason to pause the production of the CNP to allow further progress with the Local Plan.

Policy CH10 – Green and Blue Infrastructure and Biodiversity Net Gain (Comment)

- 1.44 There is no reference within this Policy to Strategic Alternative Natural Greenspaces (SANG). There are three mentioned in the pre-text to the Policy but as drafted, it is unclear if further SANG is necessary to support the residential development proposed in and around Chobham.
- 1.45 As set out within the accompanying Local Plan representations (**Appendix 2**) and the Vision document (**Appendix 3**), the Land at Fairoaks will provide up to 57 hectares of SANG, which is not currently recognised in the Draft CNP.
- 1.46 **(Comment) – greater clarity is required in the CNP and evidence base with respect of SANG provision, including additional SANG required to facilitate new development, and the positive aspects arising of its provision on Chobham and the wider area.**

Policy CH12 – Locally Significant Key Views (Object)

- 1.47 View 8 – This view over Fairoaks concerns the Site at Fairoaks Airport. As set out above, no landscape evidence accompanies the draft CNP in respect of these views. The view is therefore unjustified by evidence.
- 1.48 In respect of Land at Fairoaks Airport, as set out in the appended Landscape Appraisal (**Appendix 7**), the visibility is very restricted, and as set out in paragraph 6.1.3 of Appendix 7, “..the surrounding topography

and vegetation substantially limit views of, and into, the Site". Woodlands, copses, and tree belts throughout the valley floor and on the surrounding valley sides to the North, East, South, and West provide physical and visual enclosure around the Site (paragraph 6.1.3 of **Appendix 7**). It is recognised that within the Site itself, the central field to the north of the airfield is relatively open but there is woodland and tree belts along the eastern boundary, and the open character is confined within the Site due to its function as an airfield. No evidence is provided within the CNP of these views.

1.49 It is also worth noting that the Site is only designated as Green Belt, a planning designation to keep land open. This is presently achieved by the Green Belt designation. There is no local or national landscape designation, nor evidence that the Site contributes, in any way, as a Valued Landscape.

1.50 The Parties therefore request that the view over Fairoaks is removed as to not preclude development.

(Objection) – Amendment to Draft Policy CH12

1.51 Delete the Policy or remove View 8 View over Fairoaks.

Policy CH14 – Improving Walking, Cycling and Equestrian Opportunities (Comment)

1.52 The proposals at Fairoaks contain extensive walking, cycling and equestrian opportunities. The plan on p.23 of Appendix 3 demonstrates the provision of pedestrian / cycleways through the Site and to Woking.

Policy CH16 - Providing a Range of Community Facilities (Comment)

1.53 The promotion proposals at Fairoaks contain numerous community facilities including retail facilities, community centre, primary school, sports hub and mobility hub. These are facilities, that not just new residents would utilise, but also the existing community of Chobham. It is recognised in the supporting text to the policy that the following are priorities for the local community:

- Cycle track
- Skate park
- Meeting spaces for teenagers
- Allotment/growing spaces/community orchard

1.54 There is the opportunity for these spaces to be provided within proposals at Fairoaks.

Other Matters

1.55 The Neighbourhood Area Profile (March 2023) is centred on Chobham itself. Land at Fairoaks is a substantial previously developed site which does need to be appropriately recognised in the CNP.

Summary

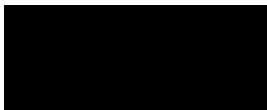
1.56 Notably, SHBC's submission version Local Plan will be subject to an Examination in Public from September 2025, and as set out above, it is premature to publish the CNP ahead of adoption of the Local Plan.

1.57 The Parties have objected to the following policies and amendments have been suggested to help ensure the draft CNP meets the 'basic' conditions set out within the Town and Country Planning Act 1990 (as amended).

- Policy CH3 Character of Development
- Policy CH4 – Energy Efficiency and Design
- Policy CH8 Supporting Local Employment Opportunities
- Policy CH12 Locally Significant Key Views

1.58 The Parties would be happy to meet to discuss the above representations with the Neighbourhood Planning Group and specifically how development proposals at Fair Oaks Airport could meet priorities of the local community listed in Policy CH16.




















Yours sincerely

A solid black rectangular box used to redact the signature of Charles Collins.

Charles Collins MSc MRTPI
Head of Office



Revision	Date	Drn	Ckd
A Graphic Update & Draft Removed	20.09.24	J.W.	V.A.

-  Site Boundary
-  Residential PDL
-  Additional Residential
-  Mixed use
-  Employment
-  Primary School
-  Formal Sports
-  Natural Greenspace
-  SANG
-  Green Links
-  Equestrian Area
-  Highway Infrastructure
-  Potential Location of Gypsy & Traveller Site
-  Indicative Attenuation
-  PROW
-  Indicative Pedestrian Routes
-  Vehicular Access
-  Cycle / Pedestrian Access
-  Existing Buildings
-  Existing Trees and Hedgerows

Project
FAIROAKS

Drawing Title

FRAMEWORK PLAN

- SCENARIO A

Date	Scale	Drawn by	Check by
19.09.24	1:5,000@A2	J.W.	V.A.
Project No	Drawing No	Revision	
333101492	RG-M-11	A	



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REPRESENTATIONS TO THE REGULATION 19 CONSULTATION ON THE SUBMISSION SURREY HEATH LOCAL PLAN (2019-2038)

RESPONSES ON BEHALF OF VISTRY GROUP

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Appendices

Appendix 1: Fairoaks 'Vision' document – 'A Vision for Fairoaks Garden Village'

Appendix 2a: Proposed changes to the Policies Map

Appendix 2b: Green Belt Removal Plan

Appendix 2c: Employment Comparison Plan

Appendix 2d: Framework Plan

Appendix 3: Landscape and Green Belt Appraisal

Appendix 4: Exceptional Circumstances Report

Appendix 5a: Transport Feasibility Appraisal Update Note & Transport Feasibility Appraisal

Appendix 5b: Chobham High Street Improvements

Appendix 5c: Chobham Transport Strategy

Appendix 6: Employment Market Update & Employment Market Assessment (2022) – Savills Economics Team

Appendix 7: Air Quality Statement

0. Executive Summary

- 0.1. Vistry Group (Vistry) is promoting land at Fairoaks for a new settlement of approximately 1,500-1,800 homes, incorporating a range of green, community and transport infrastructure proposals. The 'Vision' document is provided at Appendix 1 of these representations. Savills has prepared the representations with input from a range of technical consultants, including Stantec (Masterplanning and Landscape), SLR (formerly Vectos) (Transport) and Savills (Economics). These representations follow previous submissions made in May 2022 on the Regulation 18 consultation version of the emerging Local Plan.
- 0.2. Vistry welcomes a new Local Plan for Surrey Heath, noting the present development plan is now considerably out of date. However, objections are raised in these representations to a number of emerging Local Plan policies, principally to ensure the Plan is more positively prepared and capable of being found sound at examination, to realise the development potential over an alternative plan period to at least 2041. Despite the recognised environmental and technical constraints (principally to the west of the Borough), there exists additional capacity to accommodate more ambitious housing and economic/ employment objectives in order, for example, to achieve the requirement of 'at least' 321 dwellings per annum (dpa) within the Borough boundary (based on the current needs figure), contribute effectively to economic growth objectives, and ensure adequate provision for Gypsy and Travellers.
- 0.3. In addition, Surrey Heath Borough Council (SHBC) should be doing everything possible to accommodate all its housing and development needs within its own boundaries, where the needs arise. Assumptions have presently been made about the treatment of any unmet needs (still assumed to be accommodated in adjacent Hart District), about which the Council should be both adaptive and cautious. As at the Regulation 18 stage, the emerging situations in both Runnymede and Woking Boroughs are still not yet known, as their revised Local Plans are awaited. Hart District is also required to review its Local Plan by 2025 with no date currently set to commence a review for a new Local Plan. The situation has moved on again since Hart's Local Plan was subject to examination in 2018/19 and SHBC must be mindful of this.
- 0.4. There are further risks in respect of the delivery of balanced and mixed communities, through the emerging Local Plan reliance on town centre regeneration sites (which will predominantly deliver smaller dwellings), noting a risk that policy aspirations for a 40% provision of affordable housing, or for 20-25% affordable housing within Camberley Town Centre, are more challenging for regeneration sites. In respect of housing, an effective plan is also placed at risk, owing to the absence of any real plan contingency, over ambitious assumptions on windfalls, and a disproportionate reliance on the west of the Borough in respect of allocations, and the only identified future broad location for growth. In respect of the evidence of land availability, and that of Green Belt capacity for growth in particular, this is plainly unsound. Furthermore, in respect of Gypsy and Traveller provision, the emerging Local Plan falls short, with insufficient allocations to meet need.

- 0.5. The proposed plan period identifies a commencement date of 2019, which is some 6 years prior to the expected adoption of the new Local Plan (assuming the plan is eventually adopted later in 2025). The Local Plan's proposed housing supply for the Borough is therefore reliant in the short term on the delivery of existing commitments, first planned in the now out of date Local Plan of 2012. This approach does not accord with paragraph 22 of the NPPF that strategic policies should look ahead over a minimum 15 year period from adoption. This results in a Local Plan that is not positively prepared. An alternative approach would see a more up to date Local Plan period commencing from 2024 and running until 2040 that takes account of the contemporary policy and evidence base. This would also assist with a more balanced housing trajectory, ensuring sufficient contingency to enable a five year housing land supply. The present trajectory places significant reliance on a number of regeneration sites in Camberley.
- 0.6. Whilst Vistry welcomes recognition of the strategic employment role at Fairoaks, the emerging Local Plan predominantly seeks to maintain the status quo in respect of employment provision, and cannot be said to be positively prepared. Economic growth objectives cannot be said to be supported without a more ambitious plan, with additional or expanded allocations made - including relevant release of Green Belt land to enable the delivery of those allocations. Enclosed is evidence prepared by Savills (Appendix 6), which updates that shared at the Regulation 18 stage, justifying a more strategic approach to employment provision at Fairoaks, notably the need for an additional 14.5 hectares (ha) of employment provision.
- 0.7. Present national policy in respect of Green Belt allows for reviews to be made during plan production, noting these should rightly have long term horizons. Green Belt cannot be fixed in-perpetuity without robust and ongoing assessments, notably against wider sustainability objectives. Vistry welcomes that SHBC has realised the need for some amendments to the existing Green Belt, and hence the process of demonstrating exceptional circumstances is already underway. The emerging Local Plan should, based on the evidence, go further, and amend the Green Belt boundary at Fairoaks as SHBC have done at Longcross Garden Village, to implement the medium to long term objectives of the Plan. Further evidence prepared by Savills is also submitted, demonstrating that it is typical for local authorities to amend Green Belt through plan production, and that sufficient evidence already exists to do so at Fairoaks (Appendix 4). This is supported by relevant landscape evidence provided by Stantec (Appendix 3). Emerging national policy is even more supportive of appropriate development in the Green Belt, introducing the new concept of 'Grey Belt' for which a substantive proportion of Fairoaks should qualify.
- 0.8. In respect of transport / highways, Fairoaks is well located to Woking, the dominant town in the area, with extensive cycle, bus and rail links, all of which would form a coordinated part of the ongoing promotion. An update note has been provided by SLR to accompany the Transport Feasibility Appraisal (Appendix 5a) that was produced for Regulation 18 consultation. The delivery of major development at the Borough boundary with both Woking and Runnymede Boroughs is likely to be an important Duty to Co-operate consideration.

- 0.9. With regards to Suitable Alternative Natural Greenspace (SANG) provision, whilst Vistry supports the relevant draft Policy E1 wording, it has concerns over the ability of SHBC to deliver the required amount of SANG to meet the future housing needs of Surrey Heath as well as the timing of this provision. Whereas Vistry note that additional SANG provision could be delivered at Fairoaks which could not only serve its residents, but also some of the population arising from other housing allocations in Surrey Heath (and potentially beyond).
- 0.10. In the previous Regulation 18 representations, Vistry (then Countryside) recognised that Air Quality matters are pertinent and emphasises the likely benefits arising through the closure of the existing aviation use. Technical evidence was provided and is attached at Appendix 7 for ease.
- 0.11. To support Vistry's responses to the emerging Local Plan, the following maps are provided within the appendices; modifications to the Policies Map (Appendix 2a), a Green Belt Removal Plan (Appendix 2b); an Employment Comparison Plan (Appendix 2c) and a Framework Plan (Appendix 2d). This evidence indicates that circa 49ha of Green Belt within SHBC should be removed at Fairoaks, to enable the delivery of a comprehensively planned new settlement, including to support further redevelopment of the existing Strategic Employment Site designation. Fairoaks presents a unique opportunity to meet a considerable proportion of SHBC's future housing needs (notably in the 6-15 year period) and facilitate employment and economic growth via a sustainable new community designed around modern ways of living. The site is suitable and available to deliver housing, additional employment, gypsy and traveller pitches, SANG and community facilities to help SHBC meet its development requirements over the emerging plan period. Vistry's vision is to work in partnership with the authorities to deliver a flagship new settlement defined by long-term placemaking, exceptional public realm, high quality energy-efficient housing, and a thriving mixed-use community to provide homes for all.

1. Introduction

- 1.1. Vistry is promoting land at Fairoaks for a new settlement of approximately 1,500-1,800 homes, incorporating a range of green, community and transport infrastructure proposals. Vistry has a very strong track record as a master-developer of new communities. The Vision Document (**Appendix 1**) demonstrates other case study examples, and Vistry's development Scenarios including a Preferred Scenario.
- 1.2. Land at Fairoaks is under three separate ownerships, Fairoaks Airport Holdings Limited ('FAHL'), Fairoaks Investments Limited ('FIL') and ADP Fairoaks Limited ('ADP'). The three landowners are working together to achieve the co-ordinated redevelopment of the site. Vistry has been appointed by FAHL and FIL to promote the site for a sustainable mixed-use new community and to deliver the residential and community uses and associated strategic infrastructure, including public open space and SANG. The employment land and associated infrastructure will be delivered by ADP, including both the refurbishment and replacement of the existing buildings.
- 1.3. Vistry is clear that there is one preferred option, Preferred Scenario A, which seeks to improve the sustainable nature of the site by delivering approximately 1,600 homes and a high quantum of employment land, which in turn will increase the critical mass and provide an enhanced community offering.
- 1.4. Furthermore, there is an alternative residential-led scenario for redevelopment of the site for 1,800 homes (Scenario B) and circa 10.5 hectares of employment, and a scenario for circa 1,000 dwellings at Fairoaks (Scenario C) that has been assessed within the SHBC Sustainability Appraisal (SA) in 2022 and 2024. The Vision document (**Appendix 1**) provides a more detailed overview of the three scenarios.
- 1.5. The site also has an extensive site history beyond being promoted at the Regulation 18 Local Plan consultation stage, with a planning application being put forward in 2018 on the site, supported by a full EIA and Transport Assessment.
- 1.6. It should be noted that SHBC supported the Garden Village bid originally, with SHBC commenting on the substantial experience of the developer in delivering large-scale projects and the attractiveness of the vision for the Garden Village.
- 1.7. The representations made by Vistry, focus specifically on the FAHL and FIL land, and have been coordinated with ADP, who have made separate representations in respect of the employment land. However, Vistry are able to provide additional comments on evidence should this be required, whilst Vistry also confirm that they wish to appear at the Examination with regards to Fairoaks Airport. Vistry makes its representations on policy matters, i.e. the tests of soundness. At this stage, no issue is raised in respect of legal compliance, though this will be reviewed in the run up to the Examination Hearings.

- 1.8. These representations follow the following format:

Section 2 – Introduces Vistry’s proposals for a new settlement at Fairoaks.

Section 3 – Provides a relevant critique of the SHBC Local Plan evidence base, including the Green Belt evidence, Strategic Land Availability Assessment (SLAA), Sustainability Appraisal (SA) and other key aspects of the evidence base. This Section also introduces the evidence base submitted by Vistry to support these representations.

Section 4 – Provides representations on the emerging policies and proposals map.

Section 5 – Provides commentary on the Sustainability Appraisal (SA)

Soundness of the Emerging Local Plan

- 1.9. For the Local Plan to be found Sound it will need to meet the NPPF Test of Soundness (paragraph 35), these requirements are listed below. Vistry’s responses to the emerging Local Plan analyse the draft policies against these requirements:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

- 1.10. Vistry wish to note that its responses to this particular consultation do not concern legal compliance matters at this stage.

Representations to Surrey Heath Submission Local Plan

Land at Fairoaks



1.11. On this basis, the following policies are considered to be **unsound** (see **Section 4**): -

Policy	Details of Objection
SS1 – Spatial Strategy	Objection raised due to the timing of the plan, the supply of homes planned for over the plan period and the requirement for additional employment land.
HA2 – London Road, Camberley	Objection raised questioning the deliverability of the number of units proposed, including the percentage of affordable housing allocated to the scheme.
HA3 – Land East of Knoll Road	Objection raised questioning the deliverability of the number of units proposed, including the percentage of affordable housing allocated to the scheme.
H5 – Range and mix of housing	Objection raised stating that the identified range and mix of housing will not be delivered owing to the site allocations put forward in the plan.
H7 – Affordable Housing	Objection raised as the site allocations will not meet the policy requirement of 40% of units to be affordable.
H11 – Gypsy and Travellers	Objection raised as the Local Plan does not meet the identified housing need for gypsy and traveller accommodation.
ER1 – Economic Growth and Investment	Comments provided to support the ambition of the policy but objection raised that the current spatial strategy will not provide sufficient economic growth.
ER2 – Strategic Employment Sites	Comments provided to support the allocation of Fairoaks, but an objection raised stating the site area and retention in the Green Belt does not support the ambitions of the policy.
E2 – Biodiversity and Geodiversity & E3 – Biodiversity Net Gain	Objection raised as the policy should only require 10% BNG.
GBC1 – Development of New Buildings within the Green Belt	Objection raised due to the consultation NPPF and the Government's proposals for 'Grey Belt'. Noting in addition, the proposals map, and geographical extent of the Green Belt proposed.



GBC2 – Development of Existing Buildings within the Green Belt	Objection raised due to the consultation NPPF and the Government’s proposals for ‘Grey Belt’. Noting in addition, the proposals map, and geographical extent of the Green Belt proposed.
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Representations to Surrey Heath Submission Local Plan

Land at Fairoaks



1.12. These representations also provide further **comments and/or support** for the following policies:

Policy	Details of comments
HA4 – Deepcut	Comments provided on the number of units completed / subject to Reserved Matters and the need to 'plan positively'.
H6 – Specialist Housing	Comments provided to confirm support for specialist housing to be provided as part of a Fairoaks allocation.
IN1 – Infrastructure Delivery	Comments provided to confirm that Fairoaks will aim to meet the policy ambitions.
IN4 – Community Facilities	Comments provided to confirm that Fairoaks will be delivering extensive community facilities.
E1 – Thames Basin Heaths SPA	Comments provided to confirm that Fairoaks will be delivering policy-compliant SANG.
DH2 – Making Effective Use of Land	Comments provided to confirm that Fairoaks makes effective use of land and delivers at an appropriate density.bg
DH7 – Heritage Assets	Comments are provided, noting that SHBC consulted on proposals to locally list two hangars and the control tower at Fairoaks. ADP provided representations to the consultation. Vistry consider the buildings are not worthy of being locally listed.

Summer Consultation Period

- 1.13. It is concerning that this Regulation 19 consultation, the last opportunity for the public to comment on proposals put forward in the Borough's Local Plan, is largely taking place over the summer period. The timing of the consultation makes it far harder for stakeholders, including residents and community groups, to coordinate responses especially where no extension to the consultation has been offered. After many years of producing the draft Local Plan, it is surprising that a decision was made to consult over this period, and not sooner (or later).

Current NPPF consultation on changes

- 1.14. The Government is currently consulting on a draft National Planning Policy Framework (NPPF) with consultation taking place between 30th July 2024 and 24th September 2024. If the proposed changes in the draft NPPF (2024) were taken forward, the December 2023 NPPF would be superseded for decision making, and any new Local Plan (all subject to the draft transitional arrangements).
- 1.15. Any new NPPF applicable for plan making in Surrey Heath would be dependent on the timing of the submission of the Local Plan to the Planning Inspectorate. As the onward timing of both a new NPPF (2024) and the submission of the Local Plan is unclear at this time, reference to both the current and emerging NPPF has been made throughout these representations. For the avoidance of doubt, the standard references to NPPF means the present December 2023 NPPF.
- 1.16. On the 30th July, Angela Rayner, the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government, made a Written Ministerial Statement (WMS) outlining the Government's plan to address the housing crisis in the UK. Key points from the statement addressed the housing crisis, the reintroduction of a mandatory standard method to calculate housing requirements, details of an updated standard method, a focus on local planning and delivery, and economic growth. The WMS is a material consideration in the formulation of SHBC Local Plan.
- 1.17. What is entirely relevant, is that should the emerging plan be examined under the present NPPF, the NPPF (2024) will be used in its implementation and decision making.

Introducing Grey Belt

- 1.18. The new Labour Government proposes to insert a definition into the NPPF (2024) for “Grey Belt”, which would relate to Previously Developed Land (PDL) in the Green Belt as well as “any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework)”.
- 1.19. The site is within the Metropolitan Green Belt, with the built form to the north-west of the site currently designated as a Major Developed Site in the Green Belt. Owing to the presence of built development and associated land that amounts to PDL and thereby makes a “limited contribution” to the Green Belt purposes, it is clear that the airport and associated land meets the definition of “Grey Belt”.
- 1.20. As a follow up to SHBC’s Green Belt Review (2022) which assesses sites against the Green Belt purposes, SHBC have produced a Green Belt Review Addendum and Additional Assessment (2023). This addendum follows on from the Green Belt and Countryside Study 2017 and the Surrey Heath Local Plan Appraisal of Green Belt Sites 2018 which although differed slightly in their conclusion, both concluded that openness was compromised due to the urbanising influence of airport buildings and developed area in this location.
- 1.21. The Green Belt Review 2022 assesses only the previously developed part of the Fairoaks site contained within Surrey Heath, which amounts to 53.3ha of the proposed development under reference PDL2. Alongside the introduction of the “Grey Belt”, this demonstrates that development proposals will not compromise the quality of the Green Belt.
- 1.22. The Green Belt Review Addendum and Additional Assessment (2023) in Annex 1 provides further assessment of Green Belt parcels that have been subject to a sustainability assessment, based on the methodology Green Belt Sustainability Assessment. Fairoaks Airport (PDL2) has retained the same scoring as was reached in the Green Belt Review 2022, with the site having no or weak function against the four NPPF purposes of the Green Belt it has been assessed against, thereby leading to an overall assessment of the site as having a ‘low function’. Due to the site not contributing towards the purposes of Green Belt, it is clear that it meets the draft NPPF’s definition of Grey Belt. Further analysis of the evidence base is outlined in **Section 3** of these representations. Vistry has objected to the retention of the Green Belt designation at Fairoaks in **Section 4**.

Approach of these Representations

- 1.23. Where Vistry has objected or requested changes to policies in the emerging Local Plan, amendments to the wording of those policies are shown in the following ways:
- Text to be deleted is shown as being ~~struck through~~.
 - Text to be added is shown in (red) ***bold italics***.

2. Fairoaks

- 2.1. Land at Fairoaks comprises 153.34ha and is bound by the A319 to the north, A320 and Wey Farm to the east, the River Bourne and McLaren Technology Park to the south and open countryside to the west. Circa 101.5ha is situated within the Borough of Surrey Heath (SHBC), the remaining land is situated in Runnymede Borough Council (RBC). The site is also adjacent to Woking Borough on its southern side.
- 2.2. Fairoaks Airport comprises the western part of the site, with the towers, hangars, other buildings and car parking being situated to the north-west of the airfield, in an area designated as a 'Major Developed Site in the Green Belt'. The existing buildings at the Site are utilitarian in style and many are in a poor condition.
- 2.3. The site area for the Airport totals approximately 49ha of land associated with the operational activities of the airfield and is indivisible from the function of its use. This equates to 32% of the total site area and hence the Site is considerably previously developed. Notably in the case of Dunsfold Aerodrome (Appeal ref: PP/R3650/V/17/3171287 (paragraphs 320 to 322)) 83% of Dunsfold was considered previously developed. The Inspector referred to the 2009 appeal decision for the site and notes that the description is as apt today [emphasis added]:
- ".....The grassed areas in between the runways are functionally related to them. They provide safe run off areas for aircraft and a means of direct access to them for emergency vehicles. They are managed so as to maintain the necessary visibility for aircrew, air traffic controllers and emergency staff. They include a grass runway for aircraft that cannot land on concrete. These areas are all ancillary to, and essential to the established use of the site. In short, the operational part of the aerodrome, including the runways and interstitial grassed areas, is developed land".*
- 2.4. The land to the east of Bonsey's Lane within the site boundary (centre, north of the Site) has historically been known as Berwin Park. This land accommodates a residential dwelling and an equestrian enterprise with stabling, a sand school and productive grazing pasture. The land to the east and south of Bonsey's Lane predominantly comprises open fields and grassland. Part of this grassland is likely to have historically comprised part of wider parkland for Ottershaw Park estate, which is situated to the site's northern boundary.
- 2.5. There is an area of wet grassland to the south of the site which is within the Flood Zones 2 and 3 along the northern bank of the River Bourne, the remainder of the site falls within Flood Zone 1.
- 2.6. The existing vehicular access is provided from the A319 via Youngstroat Lane and the main Airport entrance. A footpath runs north-south through the centre of the site connecting the A319 to McLaren Park, and a bridleway runs along the western boundary of the site and continues north towards Stonehill.
- 2.7. The site is within the Metropolitan Green Belt, with the built form to the north-west of the site currently designated as a Major Developed Site in the Green Belt.

Outline of the Proposals

- 2.8. Fairoaks presents a unique opportunity to meet a considerable proportion of SHBC's future housing needs and facilitate employment and economic growth via a sustainable new community designed around modern ways of living. The site is suitable and available to deliver housing, additional employment, gypsy and traveller pitches, SANG and community facilities to help SHBC meet its development requirements over the emerging plan period. Vistry's vision is to work in partnership with the authorities to deliver a flagship new settlement defined by long-term placemaking, exceptional public realm, high quality energy-efficient housing, and a thriving mixed-use community to provide homes for all.
- 2.9. The development proposals are situated largely on the previously developed part of the site, extending towards Bonsey Lane. The site has the potential to deliver between 1,500 - 1,800 dwellings at a density of circa 37.5 to 42.5 dwellings per hectare (dph), extensive employment offer, a mixed use village centre, primary school, housing for the elderly, retail opportunities, 12 gypsy and traveller pitches and extensive SANG and landscaping.
- 2.10. The Vision Document (**Appendix 1**) provides a greater overview of the proposals including three Scenario options. These options that have been subject to masterplanning for development at Fairoaks Airport, with all proposed built development to be delivered within the SHBC boundary. These options are as follows:
- 2.11. **Preferred Scenario A – Employment Led, Mixed-Use Proposal**

This scheme is brought forward in tandem with ADP for redevelopment of the employment space: -

- 1,600 residential dwellings.
- 14.51ha of employment space in the north western corner of the site extending the current footprint of employment land, including the option for film studios (to accord with the planning application previously made by ADP).
- 1.04ha of mixed use space.
- Up to 32ha of new SANG on-site.
- 12 gypsy and traveller pitches
- Over 50% retained as open space
- Sustainable transport corridor

2.12. Scenario B – Housing Led, Mixed-Use Proposal

This scheme is a similar scheme to Scenario A, however delivers a greater quantum of housing but reduces the employment area against Scenario A to 10ha.

- 1,800 residential dwellings.
- 10ha of employment space in the north western corner of the site and using a majority of current employment land.
- 1ha of mixed use space.
- Up to 36ha of new SANG on-site.
- 12 gypsy and traveller pitches
- Over 50% retained as open space
- Sustainable transport corridor

2.13. Scenario C – Alternative Flexible Grey Belt Proposal

This option primarily concentrates development on previously developed land and has been tested in the SHBC Sustainability Appraisal (2022 & 2024).

- 1,000 residential dwellings on PDL.
- 10ha of employment space in the north western corner of the site and using a majority of current employment land.
- 1ha of mixed use space.
- 12 gypsy and traveller pitches
- 21ha of new SANG on-site.
- Over 50% retained as open space
- Focus on PDL land
- Sustainable transport corridor

SANG headroom

- 2.14. For each of the three options set out above, there is a requirement to provide 8ha of SANG per 1,000 population, as set out in Natural England's Thames Basin Heath SPA SANG Guidelines 2021. Each of the options put forward proposes an amount of SANG that meets the required provision arising from the proposed residential development set out in each scenario, whilst Scenario A and B provide an additional amount of SANG over and above what is required for each development scenario that is able to meet the wider area's needs as a result of further residential development. This overprovision of SANG at Fairoaks would assist in meeting a particular lack of supply of SANG in the eastern area of the borough, and may also act to assist with SANG provision in neighbouring Runnymede and Woking Boroughs.

Benefits / Sustainability of the Proposals

- 2.15. Land at Fairoaks offers a unique strategic opportunity to deliver a sustainable development in Surrey Heath, which would deliver substantial environmental, economic and social benefits to the local area. Taking each of these strands in turn:

Environmental

- A landscape led masterplan built on a multifunctional network of green and blue infrastructure
- An emphasis on self-sufficiency
- Retaining and protecting high quality habitats
- Providing greater connectivity to the surrounding area through improved technology and sustainable transport
- Creation of up to 57ha of SANG, over and above the required figure to mitigate residential development
- Restoration of lowland heath

Economic

- Increase in business and employment uses on site, consolidating and enhancing the existing employment offer
- Development of a diverse and innovative employment base
- Improved affordability to attract new talent to support Sci:Tech corridor and supporting sectors
- Creation of over 1,960 additional jobs and a contribution of c.£175 million GVA per annum, along with £61 million in local supply chain benefits
- High speed fibre to facilitate flexible home working

Social

- A self-sufficient place where needs for work, leisure, living and social interactions are largely met on site
- Providing approximately 1,500 – 1,800 homes for all, through a wide range of financially accessible accommodation and mixed tenure housing for both the working age population and older people

- A policy compliant level of affordable housing comprising at least 40%, as well as a mix of tenures.
- 12 gypsy and traveller pitches
- A landscape led masterplan that provides for recreation and physical and mental wellbeing, with accessible open spaces within comfortable walking distance for all homes
- Provision of a comprehensive range of social, educational, retail and recreational facilities for the community
- Encouraging food production in both private and public spaces

Delivery of the Proposals

- 2.16. Vistry (then Countryside) prepared a Site Delivery Statement to accompany the Regulation 18 representations in 2022. The sequence of intended events therein remains relevant, though in time, delivery would need to reflect the slower progress with the emerging Local Plan. The anticipated delivery trajectory, which has been validated against delivery rates from other Vistry sites results in an anticipated peak combined build-out rate of 155 dwellings per annum (dpa). The indicative timescales for the planning and development of the new settlement are identified in **Tables 2.1 and 2.2** below, assuming that the Plan is adopted late 2025. Note, these are based on Preferred Scenario A.

Table 2.1 – Indicative timescale for pre-construction stage

Year	Plan Period Year	Stage
Late 2025	Year 1	Local Plan adopted Submission of outline planning application
2026	Year 2	Resolution to grant outline/hybrid planning permission
2027	Year 3	Grant of outline/hybrid planning permission Submission of RM for initial primary infrastructure, gypsy & traveller site, and first phase of housing
2028	Year 4	Approval of first RM Discharge of conditions Site preparation and commence infrastructure works
2029	Year 5	Commence housebuilding First housing completions

Representations to Surrey Heath Submission Local Plan

Land at Fairoaks



Table 1.2 – Construction and delivery of development

Year	Plan Period Year	Open market housing	Affordable housing	Combined delivery	Cumulative delivery on site
2029	Year 5	12	8	20	20
2030	Year 6	90	60	150	170
2031	Year 7	150	100	250	420
2032	Year 8	180	120	300	720
2033	Year 9	180	120	300	1,020
2034	Year 10	150	100	250	1,270
2035	Year 11	150	100	250	1,520
2036	Year 12	60	40	100	1,620

3. Vistry & SHBC Evidence Base

Vistry Evidence Base

Appendix 1: Fairoaks 'Vision' document – 'A Vision for Fairoaks Garden Village'

- 3.1. The Vision document provides masterplanning analysis which brings together the available evidence demonstrating the basis of the emerging masterplan. It outlines a comprehensive and aspirational vision for the development at Fairoaks, and provides three development Scenarios.

Appendix 2a: Proposed changes to the Policies Map (Proposals Map)

- 3.2. This plan sets out the changes to the Policies Map sought by Vistry.

Appendix 2b: Green Belt Removal Plan

- 3.3. This plan shows the extent of the developable area at Fairoaks, and the area sought to be removed from the Green Belt.

Appendix 2c: Employment Comparison Plan

- 3.4. This plan shows the difference in area between that proposed by SHBC as a Strategic Employment Site, and the area proposed by Vistry/ADP for a Strategic Employment Site.

Appendix 2d: Framework Plan

- 3.5. This Framework Plan shows a high level masterplan for the land at Fairoaks based on the approximate development capacities outlined in this representation, as supported by the Vision Document. This is based on Preferred Scenario A.

Appendix 3: Preliminary Landscape and Visual Appraisal and Green Belt Review

- 3.6. This report reviews the landscape and Green Belt evidence produced by SHBC and assesses Vistry's proposals in terms of any impacts. It confirms there is only a limited contribution to the Green Belt.

Appendix 4: Exceptional Circumstances Report

- 3.7. This report assesses the presence of Exceptional Circumstances in Surrey Heath, and reviews relevant case law and Planning Inspectors' decisions. It confirms that Exceptional Circumstances do exist to release Land at Fairoaks from the Green Belt. Vistry notes, that in principle, SHBC has already acknowledged that the circumstances exist to amend/alter the Green Belt elsewhere in the Borough.

Appendix 5a: Transport Feasibility Update Note & Transport Feasibility Appraisal (2022)

- 3.8. This note provides an update to the Transport Feasibility Appraisal undertaken in 2022 to support the Regulation 18 Local Plan consultation. The note finds that the TFA (2022) continues to be aligned with current best practices from a transport planning perspective and that Fairoaks a movement strategy has been produced that prioritises the health and wellbeing of a community over car dependence with the associated negative carbon and air quality impacts that brings. On this basis, the note concludes that SHBC should include Fairoaks as a site allocation within the Local Plan.
- 3.9. The Transport Feasibility Appraisal report provides a summary of site transport baseline and the opportunities for sustainable travel. It confirms the site benefits from access to a good network of pedestrian/cycle links, which connect the site to the public transport network. The report establishes that the majority of junctions are expected to experience increases of 2-3 vehicles per minute which is considered unlikely to materially affect the operation of the local highway network. Furthermore, the A320 HIF analysis explicitly took into account development at Fairoaks. The report concludes that the site is capable of accommodating the development proposals from a highways and transportation perspective. This report was originally submitted in 2022 with the Regulation 18 representations.

Appendix 5b: Chobham High Street Improvements (2022)

- 3.10. The Chobham High Street Improvements report identifies possible improvements for Chobham Conservation Area and as the development evolves heritage input will sought to ensure the design preserves and enhances the Conservation Area, as well as delivering the transport improvements required for the development proposals. This report was originally submitted in 2022 with the Regulation 18 representations.

Appendix 5c: Chobham Transport Strategy (2022)

- 3.11. The Chobham Transport Strategy includes potential transport proposals in Chobham to demonstrate how transport proposals in Chobham can provide an appropriate balance between accommodating traffic flows whilst at the same time improving the overall quality of village life. This report was originally submitted in 2022 with the Regulation 18 representations.

Appendix 6: Employment Market Update (2024) & Employment Market Assessment (2022)

- 3.12. This report assesses SHBC's employment evidence base and reviews the market demand in Surrey Heath. It confirms that there is an immediate need for an about 14.5ha of employment land in Surrey Heath. The report identifies that the scale, strategic location and economic influence warrants the designation of the employment land as a 'Strategic Employment Site'. The report acts as an update to that originally submitted in 2022.

Appendix 7: Air Quality Statement (2022)

- 3.13. The report assesses the potential air quality impacts from development at Fairoaks. It confirms that the development at Fairoaks provides significant opportunities for air quality benefits and states that there would be reduction in localised pollutant emissions if the Airport were to close. The report concludes that air quality should not be seen as a constraint to a new settlement at Fairoaks. This report was originally submitted in 2022 with the Regulation 18 representations.

SHBC Evidence Base

- 3.14. SHBC has produced a range of evidence base documents to support the emerging Local Plan. These representations primarily focus upon the Sustainability Appraisal (SA), Housing, SANG and Green Belt evidence, as follows.

- Sustainability Appraisal (SA)

- 3.15. AECOM has produced a Sustainability Appraisal (SA) of the Surrey Heath Local Plan on behalf of SHBC – the SA Report (June 2024). The SA notes the Local Plan's aims and objectives and sets out the SA scope.
- 3.16. Overall, the SA demonstrates the potential to justify a new settlement at Fairoaks, as sustainable, and thus contributing to the exceptional circumstances justification to allocate the site and recognise it as developable as per the SLAA methodology. Indeed, Fairoaks has already been recognised in the evidence base as a reasonable alternative. These representations serve to demonstrate the effectiveness and justification for allocating Fairoaks as sustainable development in the emerging Local Plan.
- 3.17. Vistry's responses include requests for changes to be made to the SA in line with its responses to the Local Plan consultation. **Section 5** of these representations outline suggested modifications to the SA.

SHBC Housing and Land Capacity Evidence

- Housing Topic Paper (August 2024)

- 3.18. The Housing Topic Paper seeks to explain the approach taken to housing provision over the proposed plan period 2019-38, noting national policy and the requirements arising from the Standard Method for calculating housing need. Vistry wishes to make the following observations on the evidence, which are relevant for the representations in respect of the level of planned housing provision (see **Section 4**).

- 3.19. *Housing Delivery Test:* It is noted from paragraph 2.12 of the Housing Topic Paper that SHBC scored a HDT score of 129% within the Housing Delivery Test 2022. Savills believes the score is high on the basis of delivery of the past three years (which included an element of office to residential permitted development) of circa 1,110 dwellings (average 370 dpa). This demonstrates the present potential for delivery above 300 dwellings per annum (dpa) in the Borough. The methodology for calculating housing supply should take account of the Standard Method requirements, as the existing Local Plan is over five years old and has not been reviewed. For the purposes of the Housing Delivery Test (which is backward looking), the available data indicates that the need required was 849 dwellings, or 283 dwellings per annum. This presumably factors the period of grace in 2020 owing to the Covid restrictions. Existing housing commitments delivered in the period 2019-21 are already accounted for via the HDT, and need not be 'rolled into' a freshly prepared local plan, which should instead positively prepare for additional growth.
- 3.20. *Camberley Town Centre Area Action Plan:* It is noted from paragraph 2.15 of the Housing Topic Paper that sites identified in 2014 are still to receive planning permission at London Road Block, Camberley Station and Land East of Knoll Road. SHBC will be mindful of deliverability in reviewing fresh allocations in the new Local Plan process. This is relevant for ensuring a balanced mix of supply sites, which are not all focused on regeneration sites, and not all in one broad area of the Borough.
- 3.21. *Housing Needs Assessment (2024):* Paragraph 2.17 of the Housing Topic Paper highlights the relevant evidence of local housing needs (prepared to 2040). The assessment identifies a broad mix and type of housing, as set out in Table 5 of the draft Local Plan. Yet as recognised in the draft allocation policies and supporting text there are several predominately flatted schemes in Camberley town centre. These will not provide the variety in housing mix identified.
- 3.22. The SHBC Local Housing Needs Assessment (2024) identifies a net affordable rented housing need of 184dpa and a net need of 137dpa for home ownership products, equating to 321dpa. There is also a need for 66 affordable rent dpa in the east of the Borough, but the total number of dwellings planned for in this area will not meet this need. Indeed, of the proposed allocations, Vistry predict that none will go anywhere close to the affordable housing potential offered by Fairoaks.
- 3.23. *Interim Housing Capacity Study (2018) - Land Constraints:* Paragraph 3.2 of the Housing Topic Paper highlights a number of environmental constraints in the Borough. These are factually the case, though it is notable that 44% of the Borough is metropolitan Green Belt, some of which is not otherwise constrained. It is not immediately clear what proportion of land in the Borough is only constrained by Green Belt, though at paragraph 3.3 a reference to 29% of land (over and above that affected by absolute constraints) is only designated as Green Belt. This presumably includes land at Fairoaks.
- 3.24. The Interim Housing Capacity Study (2018), the most up to date version of this document, led to the conclusion in 2018 of unmet needs of 731 units against a requirement of 5,632 required in the (then) draft plan period of 2016-32 (352 dpa over 16 years). Paragraph 3.6 of the Housing Topic Paper reports that previously Hart District, Rushmoor Borough and SHBC had worked jointly on housing market area evidence. This was the case as required by the former version of the NPPF in order to calculate the objectively assessed housing need at the local level. It is now the case that this is undertaken by the Standard Method. The position of 2018 has undoubtedly moved on.

- 3.25. It is also the case that the unmet needs figure, whilst reported to the Hart Local Plan Examination, was not tested through an Examination relating to Surrey Heath. The process reported in the Housing Topic Paper paragraphs 3.7 and 3.8 records that the Inspector recommended the Hart Local Plan as sound, including the unmet needs from SHBC, but he did require an early review, which is entirely relevant for Surrey Heath. This review was supposed to have proceeded from a point ahead of 2025. It is now entirely probable that Hart District will move forward with a new Local Plan under the NPPF (2024) requirements (there has been no published progress on their new Local Plan).
- 3.26. Paragraph 3.15 of the Housing Topic Paper notes work from the Countryside Study (reviewed in further detail below) and identifies that capacity for 259 dwellings was identified on land which is countryside (and not Green Belt). Delivery questions over the suitability of Pine Ridge Golf Club are noted. Deliverability aside, it is clear from the evidence that only relatively limited capacity exists in land which is only designated as countryside.
- 3.27. *Emerging Local Plan (2019-2038)*: Paragraphs 4.6 – 4.20 of the Housing Topic Paper – Vistry agrees that the housing requirement should be ‘at least’ 321 dpa based on Standard Method and the application of the cap as a starting point. Thus the requirement over 19 years is ‘at least’ 6,099 dwellings, or should the plan period be amended to 16 years starting in 2024, as Vistry suggest, a requirement of 5,136 dwellings.
- 3.28. The Housing Topic Paper summarises the updated SLAA (2023) which provides the evidence base for the emerging planned housing supply of 6,012 dwellings (paragraph 4.35) (over 19 years). This review assessed site capacity, density and delivery and also addressed some previously dismissed sites re: deliverability.
- 3.29. To reach an updated SLAA capacity of 6,012 dwellings (Housing Topic Paper paragraph 4.43) assumptions over the ‘densification’ of Camberley Town Centre have been made. This includes the London Road Block site (+81 dwellings above SLAA 2019), and Land East of Knoll road site (+283 dwellings). Again this figure (as confirmed by Table 2 – paragraph 4.56) does not include Fairoaks.
- 3.30. Thus, SHBC’s position is that the supply of 6,012 dwellings sits above the amended housing requirement of 5,578 dwellings (acting as a buffer of 7.78%) on the basis that in the period 2019-2032, 533 dwellings are met by Hart District (41 dpa over 13 years). This is however not a buffer per se, as no actual buffer has been applied in the supply over the baseline Standard Method housing requirement as a starting point, and it has not yet been tested through Examination the acceptability of continuing to assume unmet needs can be accommodated in Hart District. In addition, 59% of the supply already has planning permission.
- 3.31. *Supply*: Paragraphs 4.35 – 4.39 of the Housing Topic Paper outline the following supply sources:
- Delivery – 2019-2023: 1,501 dwellings
 - Commitments (sites with planning permission): 2,034 dwellings (factoring a very small lapse rate)
 - New Allocations: 1,903 dwellings
 - None-Allocated SLAA Sites (C2 equivalent): 137 dwellings

- Windfalls: 481 dwellings
- Total: 6,012 dwellings

- 3.32. SHBC proposes supply of 6,012 against a 'minimum' Standard Method requirement of 6,111 (2019-2038). Though, should Hart continue to make provision for the unmet needs previously identified (for the period 2019-2032), this reduces the requirement from 6,012 to at least 5,578 dwellings.
- 3.33. The sources of supply are heavily biased to the West of the Borough (see Topic Paper Table 2), which is proposed to accommodate circa 4,848 dwellings or 80% of the total proposed housing target. Of these, 2,038 are planned in Camberley, and 1,200 dwellings remain at the Deepcut allocation made in 2012. Assumptions over the delivery of this remain important, more so as the plan period is proposed to start in 2019, though this is not 'new' planned development.
- 3.34. In respect of windfalls, Appendix 1 of the SLAA (2024) provides evidence of historic delivery. Table 3, provides an overall annualised average figure of only 25.4 per year over the period 2012-2023. The evidence indicates that based on the past trend of 25.4 per year, over 15 years, windfall delivery could amount to 330 dwellings. Vistry recommends caution over ambitious windfall assumptions, noting the constrained nature of the Borough, and also extensive (by the Council's own admission) SLAA / land capacity exercises (to date). The Council will have significant information on likely housing sites, which in turn would reduce windfall assumptions. Notably, in the Inspector's Interim Findings on the draft Elmbridge Local Plan, the Inspector made it clear windfalls should not be included in the first 5 years.
- 3.35. The SLAA includes Fairoaks Airport at Appendix 3 as a discounted site, due to suitability concerns and the current Green Belt designation. The SLAA has identified broad locations with the potential for future housing growth with Fairoaks appearing to not have been considered as per Appendix 2. It is not clear why Fairoaks has also not, at the very least, been further considered as another broad location, noting for example the clear and evidenced fall in housing delivery from year 11.
- 3.36. In respect of the *Green Belt*, Appendix 1 (Methodology) of the SLAA (2023) paragraph 3.12 states that sites would generally not be considered suitable as they would be considered as inappropriate development. This is a fundamental failing of the emerging Local Plan, as outlined in these representations, as the process of whether exceptional circumstances exist has been triggered. Vistry submit that an iterative approach should be taken, to ensure that, across all the evidence base, suitable sites (such as Fairoaks) are not excluded for the purposes of the SLAA.
- 3.37. In respect of Fairoaks, to summarise (based on the criteria of the SLAA, notably at paragraph 3.26):

Availability – The site is promoted as available for development now.

Suitability – The promotion is supported by extensive (and emerging) evidence base, to justify the technical solutions to enable delivery (all in the context that in 2018/19 a planning application was made on the site, supported by a full EIA and Transport Assessment).

Viability – On the basis of known constraints / policies and the promoted quantum of development, Vistry can confirm the development as viable.

- 3.38. The SLAA does not include any detailed site by site assessments, and thus Vistry questions the conclusions made in the Assessment, though notes, that at least the work has demonstrated the matters which SBC may wish clarified in order to consider the site as developable.
- 3.39. *Housing Trajectory*: The trajectory includes completions, outstanding capacity (i.e. from detailed and outline permissions and SLAA sites). Vistry notes that there is a particular emphasis and reliance on housing coming forward on sites in Camberley in Years 6-10. Vistry also notes that there is a steady fall in the delivery of housing from 2030 onwards, as a consequence of the allocations made in the emerging plan against the housing requirement.
- 3.40. Although Vistry supports the Council's regeneration aspirations for Camberley town centre in principle, it is noted that the 1,255 dwellings which are due to come forward during this 5 year period could be challenging, notably: -
- The emerging Local Plan proposes to roll forward some existing Camberley Town Centre AAP allocations, which some ten years on, have still not yet come forward for planning permission;
 - Any land assembly, design coding / masterplanning required to enable the delivery of regeneration sites will take time;
 - Market capacity to deliver a significant proportion of (the likely) smaller dwelling types in relative close proximity in Camberley town centre.
- 3.41. On the basis that Fairoaks new settlement is allocated for development in the new Local Plan period, Vistry considers that the first housing completions could be achieved on the site within the first five years of the plan period as summarised in **Tables 2.1 and 2.2** above.
- 3.42. Overall, the Housing Topic Paper (and SLAA) serves to demonstrate the existing evidence base, and present approach in the emerging Local Plan to housing provision. As outlined in representations, SHBC should review the Housing Topic Paper / SLAA on the basis of:
- The overall housing requirement, based on Standard Method;
 - Contingency in respect of unmet needs, should other unmet needs arise, or the position in respect of Hart District not be found acceptable (with Hart's Local Plan Review yet to have taken place);
 - Spatial distribution, and bias to the western parts of the Borough, with a focus on regeneration sites only;
 - Plan period (an existing plan period of 2019 – 2038 should be amended to a plan period of 2024/25 – 2039/40, commencing on 1st April 2024) (16 years) and hence undue reliance on existing commitments from 2019, which skew the proposed planned new development;

- The approach to only a 7% buffer and whether this is a buffer at all, based on the baseline Housing requirement as a starting point, and also whether a buffer toward 10% is more appropriate;
- Appreciation of some form of lapse rate (or a more robust buffer in supply);
- Windfall assumptions, and whether 481 dwellings in the Trajectory is justified;
- Consequential amendments to the Housing Trajectory, to reduce the emerging Local Plan reliance on regeneration sites, increasing delivery rates overtime (notably in years 6-10 and 11+) and factoring contingencies. In addition, consequential updates to the SLAA in respect of Fairoaks, as developable.

SHBC's Green Belt Evidence

3.43. The SHBC's Green Belt evidence constitutes the following:

- Green Belt and Countryside Study 2017
- Surrey Heath Local Plan Appraisal of Sites Green Belt Sites 2018
- Surrey Heath Local Plan: Preferred Options (2019-2038) Green Belt Review 2022
- Surrey Heath Local Plan: Preferred Options (2019-2038) Chobham Village Green Belt Boundaries Study 2022
- Surrey Heath Local Plan: Preferred Options (2019-2038) Green Belt Review Sustainability Assessment 2022
- Surrey Heath Local Plan: Preferred Options (2019-2038) Green Belt Review Addendum 2023
- Green Belt Exceptional Circumstances Topic Paper 2024

3.44. In relation to land at Fairoaks, taking each of documents in turn:

- **Green Belt and Countryside Study 2017**

3.45. Annex 4 contains the summary of findings within the document. As recognised by SHBC in the Annex 4, parcel G52 (which comprises Fairoaks) is not considered to function against Green Belt purposes 1 and 4, and the airport land and buildings was considered to perform weakly in relation to purposes 2 and 3 (parcel G52b). Parcel G52b includes the previously developed element of Fairoaks Airport which comprises 49ha. Notably, the majority of the built form proposed is within this previously developed land (PDL) area of the site. The more sensitive land to the east and south is largely proposed as open space and SANG.

- Surrey Heath Local Plan Appraisal of Green Belt Sites 2018

- 3.46. Within this document, Fairoaks Airport is identified under reference CHO11. A summary of the assessment against Green Belt purposes is set out in Table 3.2. Appendix 5 contains a more detailed assessment. There appears to be a difference in this assessment compared to the 2017 study in relation to parcel G52b, where the site is considered to play a moderate role in relation to Purpose 3, albeit the assessment notes that *“The features are urbanising in character and have a significant impact upon the openness of the Green Belt in this location....Owing to the relatively flat and open character of the remainder of the Parcel, the adjoining commercial/aviation complex brings an urbanising influence to this area”*.

- Surrey Heath Local Plan: Preferred Options (2019-2038) Green Belt Review 2022

- 3.47. This SHBC report assesses only the previously developed part of the Fairoaks site contained within Surrey Heath, under reference PDL2. Notably this Green Belt Assessment does not assess all the Green Belt land in Surrey Heath, which arguably it should do. Notwithstanding this circa 53.3ha of the proposed development at Fairoaks as set out in the accompanying Framework Plan (Appendix 1d) is situated in Green Belt parcel PDL2, demonstrating the development proposals will not compromise the quality of the Green Belt.
- 3.48. Table 3 below sets out a summary of the assessment in SHBC Green Belt Review.

Table 3 – SHBC Green Belt Assessment Summary

Name	Purpose 1 – To check the restricted sprawl of large built-up areas	Purpose 2 – To prevent neighbouring settlements from merging into one another	Purpose 3 – To assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic settlements
Fairoaks (Ref): PDL2	No function	Weak	Weak	No function

- 3.49. Notably, under the four purposes (as defined by the NPPF) the site is considered to have either no function or a weak function, and as such is identified as having a low function against the Green Belt purposes.
- 3.50. Despite this assessment of the site specific Green Belt purposes in relation to Fairoaks, SHBC have considered all PDL in the Green Belt posing a higher risk to the integrity of the Green Belt as they are located some distance from neighbouring settlements (paragraph 4.39). This assessment is flawed. There is no guidance that states that the integrity of the surrounding Green Belt would be under threat if a parcel is removed from it. Notably, SHBC refer to the Compton High Court case in their assessment, in this case, Guildford Borough Council (GBC) have removed sites from the Green Belt that are not close to other areas such as the former Wisley Airfield.

- 3.51. At paragraph 5.10 of the Surrey Heath Green Belt Review 2022, SHBC have referred to NPPF paragraph 142 and the need to promote sustainable development when revising Green Belt boundaries, as such SHBC have produced Surrey Heath Local Plan: Preferred Options (2019-2038) Green Belt Review Sustainability Assessment 2022. SHBC advise that this has been produced to consider the sustainability credentials of relative areas of Green Belt that can be factored into the consideration of where land should be released from the Green Belt.
- 3.52. The NPPF clearly sets out the function and purposes of the Green Belt, which need to be considered when reviewing Green Belt boundaries, delivering sustainable development is a key thread running through National policy, and in this regard should be assessed when developing a spatial strategy. However arguably, SHBC have failed to consider the proposals coming forward on the sites, as they have ruled sites out too early on in the Green Belt Assessment process. This is despite the majority of the site having no/low function in Green Belt terms, and being promoted for a mixed use new settlement of approximately 1,600 homes, extensive employment offering and numerous community facilities. In this regard the NPPF (2023) is clear that “*significant development should be focused on locations that are or can be made sustainable....*” (paragraph 109). The proposals will deliver a largely self-sufficient new community, which is only circa 4km to Woking town centre and station.
- 3.53. Stantec has produced a Landscape and Visual Appraisal and Green Belt Review (**Appendix 3**). Alongside a Green Belt Review, this assesses the landscape character areas. A review of the SHBC Landscape Sensitivity Assessment 2021 can be found in Section 4 of their report.
- 3.54. The Stantec report states that the site only makes a limited contribution to the Green Belt purposes. Whilst Savills consider the SHBC assessment is flawed, the Stantec report confirms that harm to the integrity of the wider Green Belt would be significantly reduced through enhanced, robust, and clearly distinctive boundaries whilst offering a suitable pattern of development accompanied by numerous benefits to the wider community. SHBC have released Green Belt land in order to provide a defensible boundary for the Longcross Garden Village development, thereby demonstrating a precedent for such an approach.
- **Green Belt Exceptional Circumstances Topic Paper (2024)**
- 3.55. This paper sets out the specific factors that the SHBC considers amount to the 'exceptional circumstances' needed to justify the amendments to the Surrey Heath Green Belt boundary. These representations demonstrate that there are local authority wide considerations to release Green Belt due to exceptional circumstances, namely the heavily constrained nature of the borough and the need for new housing and employment. Land at Fairoaks contains a significant amount of Previously Developed Land, has a limited contribution to the purposes of Green Belt whilst provides an opportunity for sustainable development and improvements to the Green Belt. Vistry includes its exceptional circumstances justification at **Appendix 4**.

- **Employment Topic Paper (2024)**

- 3.56. The ETP sets out the council's most recent assessment of the balance of supply and demand for employment land and floorspace. It summarises the analysis in two technical papers that were prepared by Icenii in 2023. The supply side of employment land and premises is covered by the Employment Land Supply Assessment (2023). The demand side (and part of the supply side) is covered by the Employment Land Technical Paper (2023).
- 3.57. The Employment Market Update (**Appendix 6**), which provides further information to the Employment Market Assessment undertaken in 2022, provides an assessment of this evidence and observes that SHBC's overall approach to supply is potentially unsound. It relies heavily on permissions for redeveloping existing employment land and from vacant premises. This is unlikely to provide sufficient range of choices for occupiers and fails to account for the loss of premises through redevelopment.

- **Duty to Cooperate Statement of Compliance**

- 3.58. A draft Statement of Common Ground between SHBC and Hart District Council (HDC) has been published which confirms that HDC will continue to commit to helping SHBC meet its unmet housing needs by contributing 533 dwellings over SHBC's proposed plan period.
- 3.59. Since the adoption of the Hart Local Plan, Hart District Council (HDC) is required to undertake an immediate review, which was expected by 2025. To date, no substantive progress has been made.
- 3.60. This review will also need to address any identified unmet needs based on the evidence base at this time. The draft SHBC Local Plan seeks to reduce SHBC's housing requirement by 533 dwellings on the unsound assumption that there remains insufficient land availability to meet housing needs within SHBC's boundaries (as outlined in these representations). This is despite the fresh promotion of sites including Fairoaks. On the basis that exceptional circumstances to review the Green Belt are already acknowledged to exist (for example, by virtue of proposed Green Belt releases in Chobham), SHBC must rigorously explore other opportunities to meet its housing requirement, in full, within its boundaries. No precedent of unmet needs being accommodated by Hart District can be said to be established until this time, and as an absolute maximum a figure of 41dpa in the period 2019-2032 (this is a maximum of 533 dwellings). Though on the basis of any new evidence the final figure may well still be debated.
- 3.61. Thus, the emerging SHBC Local Plan requires remedy: -
- All options to accommodate housing requirements within the Borough must be explored;
 - Where these are demonstrably sustainable, and consistent with the up to date evidence base, these options must be taken;
 - It follows that this would amend, or wipe clear, the need to export housing to Hart District. Thus, whilst the draft SoCG between HDC and SHBC is acknowledged, this does not mean the approach is sound in respect of the NPPF, as further work on both emerging Local Plans is required from now;

- In addition, the emerging Local Plan situation in both adjacent Runnymede and Woking, who are progressing fresh Local Plans, will likely become relevant. The approach to ensuring housing needs are met in SHBC is of direct relevance to these authorities, notably in the east of the Borough.

- **Gypsy & Traveller Topic Paper**

- 3.62. In August 2022, SHBC produced a Gypsies, Travellers and Travelling Showpeople Topic Paper.
- 3.63. The 2022 Topic Paper sets out the national and legislative context for the provision of G&T pitches, and refers to existing provision in Surrey Heath and the findings of past assessments. It also refers to identifying opportunities for meeting identified needs and confirms the remaining shortfall in provision. In terms of the remaining shortfall, the Topic Paper concludes that there remains a significant shortfall of 29 Gypsy and Traveller pitches and 13 Travelling Showpeople plots against the Council's identified needs.
- 3.64. Vistry's response to the emerging Local Plan confirms that provision can be made for 12 G&T pitches at Fairoaks. This is available land, which would contribute significantly to the identified shortfall.

- **Thames Basin Heaths Special Protection Area Topic Paper**

- 3.65. Strategic SANGs will be important in SHBC to ensure the delivery of the extensive town centre sites that will not have the space to deliver on-site SANG.
- 3.66. SHBC acknowledge in the Topic Area that acquiring additional SANG capacity, especially in the West of the borough, has been tricky with capacity needing to be provided by HDC. As already discussed, HDC are required to review their Local Plan by 2025 (which will probably be delayed) and it is possible that previous commitments regarding SANG capacity may not be delivered. In this event, housing delivery could be severely impacted, demonstrating the importance of allocating additional sites such as Fairoaks, which is able to provide its own on site SANG. This SANG would also be able to provide some strategic SANG, providing additional capacity to serve other schemes, albeit it is recognised the need is largely in the west.
- 3.67. The apparent limitations of SANG capacity to the west of the Borough, where the emerging Local Plan proposes to focus growth, is a serious failing of plan effectiveness and requires remedy.

4. Representations

Policy SS1: Spatial Strategy

- 4.1. SUMMARY OF VISTRY RESPONSE: **OBJECTION**
- 4.2. Vistry consider Policy SS1 to be **unsound** as the spatial strategy is not considered to be **consistent with national policy** nor is the spatial strategy for the borough **positively prepared**.
- 4.3. Policy SS1 contains the spatial strategy for SHBC over the proposed plan period. This identifies that new development will be directed to the west of the Borough, as shown on the Policies Map. Criterion 1c) of Policy SS1 states that the east of the Borough is heavily constrained by environmental designations and Green Belt and has limited capacity to accommodate new development. As was the case at Regulation 18, Vistry fundamentally disagrees with this.
- 4.4. Vistry do not view the Local Plan to be consistent with national policy, as the Local Plan does not accord with paragraph 22 of the NPPF that strategic policies should look ahead over a minimum 15 year period from adoption. The Local Development Scheme states that the Local Plan is not anticipated to be adopted until Autumn 2025, which should be viewed as the earliest opportunity for adoption once further evidence gathering, submission, Examination and Main Modifications are taken into account. This anticipated date for adoption therefore necessitates a local plan period that should stretch more than likely to 2040+ to ensure a 15 year period after adoption. Vistry has based its calculations on a forward looking plan period of 2024-2040 (16 years).
- 4.5. The test of soundness set out in the NPPF requires a local plan to be 'positively prepared'. SHBC have continued with an approach that sees the Local Plan period commence from 2019, which will result in roughly a five year gap to the point at which the plan is eventually submitted. Plan-making should be conducted in a manner that provides "a positive vision for the future of each area" as set out in paragraph 15 of the NPPF. Advancing the plan period to a 2024/25 start, would also reflect the approaches taken in SHBC's evidence base, such as calculating housing growth using the Standard Method.
- 4.6. SHBC's currently proposed approach to housing supply includes a total of 59% of housing provision that is completed or has planning permission and therefore, cannot be said to meet the future development needs of the borough. For example, point 2) a) ii includes a major site allocation at Mindenhurst in Deepcut of about 1,200 homes however, roughly 450 homes at Deepcut have been constructed or been subject to Reserved Matters approval with the remaining dwellings expected to receive Reserved Matters by the end of 2024. The Deepcut site was originally a product of the previous South East Plan, produced in the 2000s and adopted in 2009.

- 4.7. In order for SHBC to future proof the Plan (i.e. be positively prepared) and allow sufficient flexibility in accordance with the NPPF, SHBC need to allocate further housing now. In doing this, identifying additional housing sites in the east of the Borough will be imperative in order to meet affordable housing needs. SHBC's severe housing need is identified within SHBC's latest Annual Monitoring Report, which details that only 17% of housing completions have been affordable in recent years. Within Hart District Council and Rushmoor Borough Council, there is also historic under delivery (Hart have delivered 26% affordable housing need against a target of 40%). SHBC are not enabling future affordable housing needs to be met by continuing to focus on a spatial strategy that only delivers housing need within the defined settlement areas without considering development outside of these areas (see Vistry's comments against Policy H7 Affordable Housing).
- 4.8. A spatial strategy that incorporated further Green Belt is not an absolute constraint to development, and as detailed within the Exceptional Circumstances Report (**Appendix 4**), case law and Planning Inspectors' decisions support removal of land from the Green Belt via the Local Plan process where Exceptional Circumstances have been demonstrated. Furthermore, whether Exceptional Circumstances have been demonstrated is a matter of planning judgement (see IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin) and Compton Parish Council and others v Guildford Borough Council and others [2019]).
- 4.9. As set out in the Exceptional Circumstances Report (**Appendix 4**), significant exceptional circumstances exist in terms of local authority wide considerations as well as site specific considerations relating to Fairoaks.

Local Authority Wide Considerations:

- The heavily constrained nature of the Borough (74% affected by Green Belt or environmental constraint, with the remaining areas mostly already built up to boundaries);
- Housing need - to provide land to achieve and meet identified development needs and ensure a balanced mix of homes achieved through a range of sites (including for Gypsy and Travellers);
- Inability of other nearby local authorities to assist with meeting all of SHBC's unmet housing needs;
- Employment need – opportunity to provide additional jobs, close to existing settlements (Woking / Ottershaw);
- The unavailability of suitable other brownfield sites and underutilised land within settlement boundaries (on the basis of SHBC's own evidence).

Site Specific Considerations relating to Fairoaks:

- Previously Developed Land (49 ha);
- Limited contribution to Green Belt Purposes;
- Compensatory improvements;
- Opportunity for Sustainable Development/ To be well served by public transport
- Benefits of development.

- 4.10. It is recommended that the plan period is changed to 2024 – 2040 to provide for a 16 year period and reflects a standard method currently calculated on affordability of homes at end of 2023.

SHBC Local Plan Housing Supply

- 4.11. The following table is a compilation of the total SHBC figures attributed to SHBC's housing supply over the proposed plan period (2019-2038), as set out in **Table 4.1** titled 'Housing Supply: number of dwellings (net) per delivery period'.

Table 4.1 Housing Supply: number of dwellings (net) per delivery period

Source	No of Dwellings
Completions*	1,501
Outstanding Capacity	2,034
Lapse rate	-44
Allocated sites	1,903
Not Allocated sites	137
Windfall	481
Total	6,012
Hart additions	533 (41dpa x 13)**
Total	6,545

**To monitoring period 1st April 2024.*

***Period 2019-2032, to match Hart's adopted plan period.]*

- 4.12. Should the Local Plan period be changed to 2024-2040 (16 years), as advocated for within Vistry's representations, and the need to include a 10% lapse rate is included, **Table 4.2** below shows a revised indication of housing supply for SHBC. The figures illustrated below remove 1,501 residential completions up to 1st April 2024 and also include Vistry's Preferred Scenario A for development of 1,600 residential dwellings at Fairoaks Airport.
- 4.13. It is clear from **Table 4.2** that there is a current housing shortfall when assessed against the current housing need of 320dpa over the Local Plan period. This shortfall of 692 dwellings can be addressed entirely with the option of redevelopment at Fairoaks Airport, as is highlighted in the table, and the Local Plan can proceed largely as drafted.
- 4.14. A significant shortfall remains when the proposed housing supply is assessed against the draft proposed standard method figure of 658 dpa, however Fairoaks helps SHBC to get much closer to an emerging annual housing requirement figure that is within 200 dwellings below the new standard method figure of 658 dpa. When means should SHBC proceed under the current NPPF, with Fairoaks and some additional allocations, it would not need to do an immediate review in line with the draft NPPF transitional arrangements Vistry want to make it clear that Fairoaks represents a site for redevelopment that is available, suitable and viable now.

Table 4.2 Housing Supply: revised number of dwellings (net) per delivery period (recommended 2024-40)

Source	No of Dwellings
Completions	0
Outstanding Capacity	2,034
Allocated sites	1,903
Not Allocated sites	137
Windfall	481
Total	4,555
Lapse rate	%10 (-455)
Revised total	4,100
Hart additions	328 (41dpa x 8) (Period 2024-2032 if HDC continue to provide)
Total	4,428
Current housing need	5,120 (320dpa x 16)
Current housing shortfall	-692
Fairoaks	1,600
Total	6,028
Shortfall current method (320dpa)	+908

- 4.15. Should the Inspector be minded to retain the current Local Plan period commencing in 2019 and therefore also include residential completions delivered during 2019-2024, the following **Table 4.3** shows that with the preferred scenario at Fairoaks Airport included, there is still a very significant shortfall of 4,919 dwellings over the Local Plan period in the borough when assessed against the new draft standard method figure. However, this shortfall, is toward the 200 dpa below new draft standard method, so might be considered acceptable (with Fairoaks) in a transition period, ahead of a fresh (immediate) plan review.

Table 4.3 Housing Supply: revised number of dwellings (net) per delivery period commencing in 2019 based on new draft standard method (2019-2038)

Source	No of Dwellings
Completions	1,501
Outstanding Capacity	2,034
Allocated sites	1,903
Not Allocated sites	137
Windfall	481
Total	6,056
Lapse rate	%10 (-606)
Revised total	5,450
Hart additions	533 (41dpa x 13)
Total	5,983
Fairoaks	1,600
Total	7,583
Shortfall new method (658dpa x19)	-4,919
Shortfall of dpa against new method	-259 (over a 19 year LP period)

4.16. It is relevant to understand the approach taken with other local plans that share similarities with SHBC's case in light of the Government's proposed changes to the NPPF. The draft NPPF does state that Local Plans that are submitted for examination under the current NPPF (December 2023) will be examined under the same version of the NPPF. Despite this, Bournemouth, Christchurch and Poole (BCP) Council have been asked by the Planning Inspectorate (PINS) to consider the proposed changes despite submitting their local plan for examination on 27th June 2024. BCP propose to meet just over half of their housing need per year (1,600 dwellings) when assessed under both the current and proposed standard method owing to constraints to development such as Green Belt. Very recently (September 2024), in Elmbridge Borough, the Inspector in her Interim Findings, has outlined that to be sound, exceptional circumstances are engaged, to potentially allocate c.2,900 dwellings in the Green Belt. All to contribute to housing needs, and all under the present NPPF (2023).

4.17. Under proposed changes to the draft NPPF (2024), planning authorities would be required to undertake a review of their Green Belt boundaries where they cannot meet their identified housing need without doing so. The Inspectors for BCP's examination have responded to the Council requesting that they consider the implications of the proposed reforms to the NPPF and the written ministerial statement 'Building the homes we need'.

4.18. **REQUEST: Vistry therefore would like to see a change to the wording of Policy SS1: Spatial Strategy as follows:**

c) The east of the Borough is heavily constrained by environmental designations and Green Belt, though and will have limited some capacity to accommodate new development. Development opportunities in this area will be focused in: i. Lightwater village; ii. Bisley, Chobham, West End and Windlesham villages, which are inset within the Green Belt; and iii. a new settlement at Fairoaks.

New Homes

2) Over the period 2019—2038 2024 – 2040, the Council will ensure that, subject to the availability of deliverable avoidance and mitigation measures in respect of the Thames Basin Heath Special Protection Area, provision is made for the delivery of at least 5,578 5,120 new homes in the Borough. This housing requirement will be delivered from completions, existing planning permissions, allocations and SLAA sites as follows:

a) Approximately 4,848 (net) new homes focused in the settlement areas in the West of the Borough, including:

i. In Camberley, approximately 2,178 (net) new homes, including approximately 1,548 net new homes in Camberley Town Centre, focused on two large site allocation at London Road Block (approximately 524 net new homes) and Land East of Knoll Road (approximately 340 net new homes),

ii. A major site allocation at Mindenhurst in Deepcut (Princess Royal Barracks site) of about 1,200 homes and Suitable Alternative Natural Greenspace,

iii. In Frimley, approximately 454 (net) new homes,

iv. In Frimley Green, approximately 245 (net) new homes,

v. In Mytchett, approximately 286 (net) new homes, and vi. In Bagshot Village, approximately 430 (net) new homes.

*b) Approximately ~~727~~ **2,327** homes in the east of the Borough, **to include a new settlement at Fairoaks.***

c) Other sources of supply to meet the housing requirement will include windfalls

- 4.19. For the avoidance of doubt, Vistry supports the ongoing development at Midenhurst, Deepcut. The site benefits from planning permission, with the Reserved Matters processes either determined, or pending determination. On the basis of a proposition to start the plan period on 1st April 2024, the Site should still be recognised as Outstanding Capacity or via a separate ongoing allocation (emerging policy HA4). It should not however be treated as high as 1,200 dwellings, as a significant proportion of this is already delivered.

Policy HA2: London Road Block Site Allocation and Policy HA3: Land East of Knoll Road Site Allocation

- 4.20. SUMMARY OF RESPONSE: OBJECT
- 4.21. Vistry consider Policy HA2 and HA3 to be **unsound** as the approach is not **positively prepared** nor is it **effective**. Vistry's response to Policy HA2 and Policy HA3 should be read in conjunction with Policy H7. For the avoidance of doubt, Vistry does not object to the principle of town centre regeneration, rather the practical implications arising from these proposed allocations.
- 4.22. Policy HA2 and Policy HA3 are site allocations for residential development within Camberley Town Centre. Both policies set an affordable housing requirement of 20% for Policy HA2 and 25% for Policy HA3. Policy H7 Affordable Housing requires developments granted permission to deliver 40% of dwellings as affordable housing, unless there is a site-specific allocation for affordable housing. Policy H7 also states that "in the absence of a site-specific allocation where the site is located within Camberley Town Centre and is for fully flatted development the affordable housing requirement will be reduced to 25%". Policy HA2 sets an affordable housing requirement of 20% which is at odds with the requirement in Policy H7a and flatted development to deliver 25% affordable housing provision.
- 4.23. Furthermore, Policy HA2 and HA3 have site-specific allocations of 20% and 25% respectively which is a significant reduction in their allocation of affordable housing between the Regulation 18 consultation and Regulation 19 consultation from 40% provision. It is noted that SHBC's Local Plan Viability Assessment takes account of viability and additional infrastructure costs associated with the complexity of the two schemes, it is however likely that further viability issues commonly experienced within urban regeneration schemes will reduce the percentage of affordable housing that comes forward against the policy requirement as well as the mix of housing that is proposed if and when a planning application comes forward for either site.
- 4.24. Policy SS1: Spatial Strategy directs new development to a list of defined settlement areas in the borough with Camberley Town Centre a focus for significant new development at high density. As set out in SHBC's Local Plan Viability Assessment, affordable housing delivery is required to be significantly reduced in order for the site to become viable and to allow for a margin for associated infrastructure.
- 4.25. However, initial research of similar urban regeneration schemes in neighbouring Surrey town centres has shown that the level of affordable housing that is agreed is regularly much lower than the 20-25% that Policy HA2 and HA3 are seeking. **Table 4.4** below provides a snapshot of urban regeneration schemes that have failed to provide a policy compliant amount of affordable housing. A contributory factor is the additional costs associated with regeneration of PDL, and also higher existing use values.

Table 4.4: Affordable housing delivery realised in town centres regeneration schemes

Site	Location	Planning Reference	Policy requirement vs. AH delivery	Affordable Housing Agreed	Scale of Development
Debenhams, Millbrook	Guildford	21/P/02232	40% policy requirement 2.70% secured	five one-bedroom 'intermediate' tenure affordable units	185 residential flatted units over two new buildings of 8 and storeys. Also includes redesigned civic space, 2,170sqm retail/commercial floorspace.
North Street	Guildford	23/P/01211	40% policy requirement 9.97% secured	47 affordable homes (31 affordable rent and 16 shared ownership)	471 dwellings are proposed, along with 2,019sqm of Class E floorspace.
Guildford Station Redevelopment	Guildford	14/P/02168 Appeal Ref: APP/Y3615/W/16/31 61412	40% policy requirement 10.27% secured	45 shared ownership dwellings	438 residential dwellings, as well as station redevelopment, new office and retail development
Goldsworth Road, Woking ('EcoWorld')	Woking	PLAN/2020/0568 APP/A3655/W/21/32 76474	40% policy requirement 5.17% secured	48 shared ownership flats	929 residences within five tower blocks ranging between nine and 37 storeys on Goldsworth Road across a mixed-use scheme

4.26. Vistry would like to make the point that in the context set out above, adding a site allocation to the Local Plan for a mixed use scheme at Fairoaks that is shown to be able to deliver at least 40% affordable housing over a mix of tenures is critical in order to meet the need set out in the Council's own evidence base (primarily the Housing Needs Assessment 2024).

4.27. **REQUEST: No changes are proposed to the policy. However, SHBC must note the lower level of delivery of housing, including affordable housing, that urban regeneration schemes bring to the market and therefore recognise the suitability and opportunity that promoting Fairoaks as a site allocation within the Local Plan offers.**

Policy HA4: Mindenhurst, Deepcut Site Allocation

4.28. SUMMARY OF VISTRY RESPONSE: COMMENT

- 4.29. Vistry wish to raise points regarding progress already made at the Deepcut Site Allocation and the implications that this could have for the draft Local Plan. Vistry's comments for Policy HA4 should be read in line with those comments made against Policy SS1.
- 4.30. As set out in the response to Policy SS1, roughly 450 homes at Deepcut have been constructed or been subject to Reserved Matters with the remaining dwellings expected to receive planning permission by the end of 2024. Vistry wish to make clear that the inclusion of Deepcut within the Local Plan without referring to the construction of residential dwellings that has already taken place does not represent a positive strategy, given that a significant amount of development has already taken place and the same allocation was also included as a site allocation in the Council's current Core Strategy (2012) (and conceived in the 2000s during the preparation of the former South East Plan, 2009).
- 4.31. Vistry have also made comments with regards to amending the Local Plan period to 2024-2040 to reflect the anticipated timescales for adoption of the plan. This is a key point that could require significant alterations to Policy HA4 from the Local Plan and result in a further shortfall in SHBC's housing supply. A site allocation at Fairoaks within the Local Plan would provide a pragmatic way to proceed with the Local Plan.
- 4.32. **REQUEST: It is suggested that Policy HA4 and the site allocation be altered to take account of the various phases of the development that have been delivered, or where detailed planning permission / reserved matters has been secured.**

Policy H5: Range and Mix of Housing

- 4.33. SUMMARY OF VISTRY RESPONSE: SUPPORT, WITH COMMENTS.
- 4.34. Whilst Vistry does not object to the wording of the policy per se, thus it is **supported**, the deliverability of the proposed housing mix is not considered achievable based on the draft allocations proposed by SHBC.
- 4.35. Table 5 in the draft Local Plan shows the indicative mix of housing required in SHBC (as set out in the Housing Needs Assessment 2023). The majority of draft allocations included within Policy HA1, as well as site allocations HA2 and HA3 are mainly flatted schemes. Vistry's view is that these will not be able to provide the range of housing required to support the need in SHBC.
- 4.36. The preferred scenario for Fairoaks, having a proposed density of between 37.5 to 42.5 dwellings per hectare (dph), ensures that sufficient land is available to provide the full mix of housing to support the findings within the Local Needs Assessment.
- 4.37. In delivery terms only, the policy risks being ineffective as the required housing mix is unlikely to be delivered over the plan period given the extensive reliance on flatted schemes.
- 4.38. **REQUEST: Given the housing mix required and the draft allocations, it is considered appropriate for SHBC to allocate suitable sites to meet the housing mix, such as Fairoaks.**

Policy H6: Specialist Housing

4.39. SUMMARY OF VISTRY RESPONSE: SUPPORT

4.40. Vistry **supports** Policy H6 and the development of specialist housing.

4.41. The Vision Document (**Appendix 1**) outlines that provision will be made for homes to meet the needs of a diverse community, offering a mix of housing types, sizes, and tenures to cater to different life stages. This could comprise either C3 or C2 uses (such as extra care or a care facility), as part of the mixed use local centre.

4.42. **REQUEST: No changes required to the policy.**

Policy H7: Affordable Housing

4.43. SUMMARY OF RESPONSE: OBJECT

4.44. Vistry consider Policy H7 to be **unsound**.

4.45. The draft policy requirement for major development sites to deliver 40% affordable housing is **not justified and ineffective** when historic delivery of affordable housing is taken into account, therefore cannot be said to be **positively prepared**. Vistry's response to Policy H7 should be read in conjunction with Policy HA2 and Policy HA3.

4.46. Vistry's previous representations to the Regulation 18 Local Plan consultation in May 2022 set out the importance of accelerating the supply of housing delivery, and therefore affordable housing, in the face of historic under delivery whilst highlighted the precarious position of SHBC relying on housing supply from neighbouring Hart District Council (HDC) where historic under delivery has also been an issue. The absence of new housing allocations will only compound this issue and not deliver the affordable housing need that is required.

4.47. Furthermore, SHBC's Housing Needs Assessment (2024) concludes that affordable housing is an important and pressing issue across the Borough, with an affordable housing need for 184 homes per annum across the Borough. This is higher than the need identified in the Housing Needs Assessment (2020) which was 159 dwellings per annum. This level of affordable housing need is already above the borough-wide target for affordable housing delivery and vastly above various site-specific allocations such as HA2 and HA3 within Camberley town centre.

- 4.48. Furthermore, Table 4.4 above shows the problematic trend of under delivery of affordable provision in urban regeneration schemes in Surrey and the revised requirements for Camberley town centre developments within the Regulation 19 Local Plan. SHBC's latest Annual Monitoring Report published in June 2022 shows that gross affordable housing completions equated to 17.12% of total housing completions in 2022-23, against a Local Plan target of 35% total completions. This affordable housing figure was very similar to the figure for the total affordable housing delivery across the Local Plan period, which equated to 16.96% of all affordable housing delivery. This position demonstrates a historic under delivery of affordable housing in the Borough.
- 4.49. As set out within the Green Belt Exceptional Circumstances report (**Appendix 4**), there is a significant need for affordable housing not just in the Borough, but also its adjoining authorities including HDC. Fairoaks will seek to deliver in excess of a policy compliant level of affordable homes of at least 40% which should be up to at least 640 affordable homes (nearly two times the number that has been delivered within SHBC over the last 6 years) and represents a significant uplift in the net delivery of affordable homes in SHBC over the Local Plan period to date (i.e. 2011 to 2020).
- 4.50. With such consistent data available for affordable housing delivery, draft Policy H7's requirement for sites of 10 or more dwellings (gross) or a site area of 0.5ha or more to deliver 40% affordable housing provision is an unrealistic expectation of development within SHBC and provides a sound reason to include Fairoaks as a separate site allocation policy. It should also be noted that Vistry have adopted a partnership model which allows for closer working with key development partners such as Homes England, registered providers and the private rented sector to deliver the required affordable mixed tenure housing.
- 4.51. **REQUEST: On the basis of any allocation of development at Fairoaks, SHBC may wish to revisit the policy, and plan/ evidence base assumptions, in light of the significant boost the allocation of Fairoaks will provide to affordable housing provision in the Borough.**

Policy H11: Gypsies, Travellers and Travelling Showpeople

- 4.52. Vistry consider Policy H7 to be **unsound**.
- 4.53. Vistry object to SHBC's approach which is not **positively prepared** nor is it **consistent with national policy**. The draft policy, as currently drafted, will not meet SHBC's identified needs for Gypsy and Traveller (G&T) and Travelling Showpeople accommodation. It also fails to provide a positive vision for the future housing needs for this community group.
- 4.54. This was the case when comments were last made at the Regulation 18 Local Plan stage and as can be seen in **Table 4.5** below, there is still a shortfall of 15 Gypsy and Traveller pitches. In the emerging Local Plan, only 8 pitches are provided. Should the pitches at Fairoaks be included, this rises to 20 pitches.

Table 4.5 Gypsy and Traveller Housing Need and Planned Provision

Gypsy and Traveller pitches	Number of pitches
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Need meeting definition	35 (further need for 30 pitches outside this definition)
SHBC Supply	Separate site with 5 pitches, plus 1 only 1 site over 100 units to provide minimum of 3 pitches. Likely 8 pitches in total
Fairoaks	12
Total (with Fairoaks)	20

- 4.55. In response to Policy H7 point 6, it is unlikely that many, if any, additional gypsy and traveller pitches will come forward on new (windfall) sites which could deliver 100 or more dwellings during the Local Plan period. The Borough is constrained by Green Belt and environmental designations which limits the opportunity for large windfall sites of over 100 dwellings to come forward. In addition, given that SHBC is seeking to promote urban regeneration over the allocation of land elsewhere in the Borough, and does not expect such sites to deliver gypsy and traveller pitches, the opportunity to accommodate gypsy and traveller pitches on suitable sites will be further limited.
- 4.56. It is also worth noting that the latest Annual Monitoring Report (June 2022) shows that against a Core Strategy target of providing 19 Gypsy and Traveller pitches by 2027, SHBC “since the date of adoption of the Surrey Heath Local Plan (2012) up until 31st March 2023 have only provided two additional Gypsy pitches, relating to planning reference 19/2074”. This shows a poor track record relating to provision of this housing need within the borough and further highlights the opportunities for much needed community facilities that redevelopment of Fairoaks Airport can bring.
- 4.57. **REQUEST: Vistry request that Policy H11 is amended as follows to include an additional point after Point 6 which sets out those development sites which are required to deliver G&T pitches as part of their overall allocation. This list should include the following sites but also be expanded, where relevant, to include other development sites which (alongside the standalone G&T sites which will be identified under Policy H12) can deliver the total G&T pitch requirement for Surrey Heath for the Local Plan period:**

[...]

“Sites which are allocated to deliver Gypsy and Traveller pitches are as follows:

- **Fairoaks – 12 G&T pitches.**
- **HA12/01 (Swift Lane Extension, Swift Lane, Bagshot, GU19 5NN) – 5 G&T pitches.**

[SHBC to add further sites to ensure that the G&T requirements are met.]

Policy ER1 – Economic Growth and Investment

- 4.58. SUMMARY RESPONSE: OBJECT
- 4.59. Vistry **objects** to Policy ER1.
- 4.60. As currently drafted, Policy ER1 is not **positively prepared, justified, effective or consistent with national policy**. The limits placed on future proposals for the regeneration and redevelopment of defined employment sites in meeting only the needs of the Borough fail to respond to the wider, nationally driven economic needs which could be sustainably accommodated in Surrey Heath on sustainable employment development sites such as at Fairoaks.
- 4.61. Vistry notes the Council's aim in Policy ER1 to support the growth and retention of existing businesses and inward investment into Surrey Heath. However, Vistry considers that Policy ER1, as drafted, is not sufficiently ambitious, does not take into account wider considerations which generate the need for employment land in the Borough, and should be more positive in creating opportunities to support economic growth and investment.
- 4.62. Vistry also notes and refers to separate responses which have been submitted to the Local Plan by ADP, which owns the existing employment buildings at Fairoaks, and which promotes the allocation of land for an expanded employment area and its removal from the Green Belt.
- 4.63. Both Vistry and ADP have agreed to work jointly on the promotion of their respective land interests at Fairoaks through the emerging Surrey Heath Local Plan process. The Parties wish to see the land removed from the Green Belt, in order to realise the long term potential of the partly previously developed site, and both are committed to ensuring appropriate employment redevelopment on the relevant parts of the site.
- 4.64. The proposed employment area at Fairoaks is identified on the following plans produced on behalf of Vistry: 'Proposed Changes To The Policies Map' (**Appendix 2a**) and the 'Employment Comparison Plan' (**Appendix 2c**). The areas covered by the proposed employment area are owned by ADP.
- 4.65. As part of ADP's proposals, and within land in its ownership, the proposed employment area would be increased in size from approximately 3.57ha to 14.5ha. 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 demand for employment space in Surrey Heath.

- 4.66. 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 film studios. ADP also proposes that future employment use within the proposed employment area could involve the reuse, expansion or redevelopment of the existing buildings and also the intensification of employment use through the building of new employment units. This land provides no contribution to the Green Belt and should be removed from the Green Belt in accordance with the NPPF (see analysis provided in **Section 3** and the representation in respect of the Policies/ Proposals Map). Indeed, to be positively prepared and consistent with national policy, to propose any growth of existing employment sites in the Green Belt, requires removal, noting the limited purposes this land presently serves to the function of the Green Belt, and to encourage inward investment / redevelopment.
- 4.67. The Employment Market Update (**Appendix 6**) identifies employment needs within Surrey Heath of the Local Plan period, including a review of the evidence base and the suitability of the present employment land in the Borough. The Savills report demonstrates that there is an immediate need for additional employment floorspace to meet needs which should be accommodated within Surrey Heath, and helps to address historic shortfalls in supply as well as meet the needs for the future.
- 4.68. The proposed Fairoaks site does not deliver an employment site at sufficient scale that would enable a more commercially attractive employment location. The expanded site would also establish a more viable employment cluster in the east part of the borough which lacks the dynamism around Camberley. A larger site would also enable greater amenity; additional opportunities for synergies between various businesses; the flexibility to ensure existing businesses are retained; and enable placemaking. Fairoaks and its Strategic Employment Site designation does not provide capacity within the Functional Economic Area (FEA), which could also enable both local and sub-regional benefits.
- 4.69. The Employment Market Assessment comments that the Draft Policy ER1: Economic Growth and Investment assumes easy substitutability of employment land from one use to another so that no new employment land needs to be allocated. This is an unrealistic approach as sites and premises cannot be easily substituted to another use and can deliver equivalent levels of floorspace. The characteristics of a site that is attractive for office use will not be one that is attractive for industrial use. Different employment property sectors have different locational requirements and different operational environments. In addition, several sites identified as having development capacity have considerable delivery barriers to the extent that they should not be considered available.

- 4.70. Both SHBC's evidence base documents (notably the Employment Land Topic Paper) and our own property market assessment identify a shortage of employment premises in Surrey Heath. The borough's industrial sectors are characterised by low vacancy and virtually no available units in its eastern half. The emerging Reg 19 Plan is oriented towards meeting need over the plan period and not towards addressing the ongoing historic shortage. An expanded Land at Fairoaks would provide the council with an additional 14.5 ha of sustainably located new employment land that would increase the likelihood of meeting the economic needs of the Borough. Strategic Employment Sites fulfil a strategic function within the Functional Economic Area and are, by definition, aligned with economic development priority areas. The currently limited proposed allocation reduces the economic potential that Land at Fairoaks could deliver and this therefore justifies the extension of the subject site.
- 4.71. The Employment Market Assessment also discuss the supply of vacant premises. The ELSA does not at this stage include vacant premises within the council's core supply of employment space, however the ETP treats this as a core part of its supply, providing the council with over 37% of its identified supply (41,000 sqm). This is an important issue that could result in a reduced future supply of floorspace if current floorspace is not redeveloped to match the existing provision, whilst it would also result in a considerable shortfall in overall employment floorspace should these vacant premises be taken out of SHBC's core supply.
- 4.72. The final point to note that highlights the case for extending land at Fairoaks is that unlike the evidence base and earlier version of the emerging local plan, the updated evidence base recognises the importance of film studios and logistics as important drivers of growth in the area. These uses should be accommodated by a combination of existing and new sites.
- 4.73. **REQUEST: The following changes should be made to Policy ER1:**
- "1) The growth and retention of existing businesses and inward investment into Surrey Heath **to meet the needs of the Borough** will be supported by:
- [...]
- To add:
- 1f) removing designated employment sites from the Green Belt**

Policy ER2 – Strategic Employment Site

- 4.74. SUMMARY RESPONSE: OBJECTION, SUBJECT TO COMMENTS.
- 4.75. Vistry support the allocation of Fairoaks Airport as a Strategic Employment Site and therefore the overall ambition of the policy, however the retention of the Fairoaks site within the Green Belt **does not support** the ambitions of Policy ER2.
- 4.76. This approach is **not justified and ineffective**, given that SHBC could remove Fairoaks from the Green Belt to allow for a more effective use of land, whilst it is also not **consistent with national policy** in that the Green Belt designation prevents greater economic growth and productivity.
- 4.77. Policy ER2 includes Fairoaks Airport and Chobham Business Centre, Chobham as a Strategic Employment Site in its list of designations which Vistry supports. However, land at Fairoaks is still located in the Green Belt and therefore limits the site's opportunities for greater employment facilities as encouraged by its Strategic Employment Site designation within Policy ER2.
- 4.78. This objection should be read in tandem with the representations submitted by ADP. ADP owns land at Fairoaks which it is promoting for allocation as an expanded employment area and its removal from the Green Belt. This is consistent with Vistry's masterplan and overall Vision for Fairoaks.
- 4.79. Vistry's position is that SHBC's designation of Fairoaks Airport as a Strategic Employment Site can remain as part of a larger development, and indeed the employment offer is proposed to be extended and enhanced (as set out in Vistry's response to Policy ER1). However, in order for the site to operate effectively as a Strategic Employment Site, the entire site lying within SHBC should be removed from the Green Belt. NPPF paragraph 153 sets out that "substantial weight is given to any harm to the Green Belt" and that "very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations." It is clear that the allocation of Green Belt over the entire Fairoaks site acts as an impediment to achieving the requirements set out in point 2 of Policy ER2: Strategic Employment Sites which states that "the redevelopment and regeneration of these sites will be supported to provide floorspace for Employment Uses and supporting facilities that meets the needs of the market". Full scale redevelopment and regeneration of the employment uses on site to realise the potential of the Strategic Employment Site is compromised whilst the Green Belt designation remains.
- 4.80. As part of this Regulation 19 Local Plan, SHBC have removed Green Belt land at Longcross Garden Village, as well as the existing Gypsy and Traveller site and the extension area at Swift Lane. This approach shows that the Council has been convinced by the argument in principle that land should be removed from the Green Belt where the function for Green Belt is not currently met.

- 4.81. An Employment Market Update and Employment Market Assessment, put together by Savills, is submitted alongside these representations to support the inclusion of Fairoaks Airport as a site allocation within the Local Plan (**Appendix 6**). At the scale proposed by ADP, 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 demand for employment space in Surrey Heath. Fairoaks Airport is not a designated airport in planning terms and most of the employers on-site are not airport-related. The airport is not considered to be a long-term viable business and there are therefore a significant number of jobs at risk if the current site is maintained as it is.
- 4.82. Furthermore, the employment uses proposed to be supported by the extended employment use, namely Classes B2, B8 and E (g) as well as the opportunity for the use of land and buildings within the defined area as film studios, support those uses specified within point 2 of Policy ER2. ADP also proposes that future employment use within the proposed employment area could involve the reuse, expansion or redevelopment of the existing buildings and also the intensification of employment use through the building of new employment units. 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 in accordance with the NPPF there is no reason to keep it permanently open (paragraph 144).
- 4.83. **REQUEST: No changes are proposed to the policy wording of Policy ER2. The allocation of Fairoaks Airport as a Strategic Employment Site is supported by Vistry.**
- 4.84. **Vistry do request that Fairoaks Airport is removed from the Green Belt and that this change is reflected on the 'East Sheet Policies Map'.**
- 4.85. This response should be read in conjunction with Vistry's responses to Policies GBC1 and GBC2.
- 4.86. This response should also be read in conjunction with ADP's response to the employment policies included in the Local Plan.

Policy IN1: Infrastructure Delivery

- 4.87. SUMMARY OF VISTRY RESPONSE: SUPPORT SUBJECT TO COMMENTS
- 4.88. Vistry notes the Council's approach to infrastructure delivery as stated in Policy IN1 and accepts the principle at Point 1 of the Policy which states that "*Development will be permitted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet the requirements arising from new development*". Overall, Vistry **supports** the policy, subject to necessary updates to the associated Infrastructure Delivery Plan (IDP) to account for an allocation of Fairoaks.

- 4.89. As a general principle, and as stated in the Vision Document which is submitted with Vistry's responses to the Local Plan, the delivery of Land at Fairoaks will involve an integrated approach to infrastructure, housing, business investment and employment development. Vistry's initial proposals for Fairoaks have been carefully formulated to ensure that the supporting facilities and amenities needed to create a largely self-sufficient new community are viable and deliverable.
- 4.90. As master developer, Vistry will be responsible for securing planning consent and delivering strategic infrastructure, landscaping, new homes, and community and mixed-use facilities in a coherent manner. Housing and infrastructure delivery will be aligned and optimised in agreement with SHBC and Surrey County Council.
- 4.91. **REQUEST: No changes are proposed as part of this consultation response. Separately, the IDP will require an update to account for the requested allocation of Fairoaks.**

Policy IN2: Transportation, Policy IN4: Community Facilities, Policy IN5: Green Infrastructure, and Policy IN7; Sports and Recreational Facilities

- 4.92. SUMMARY OF RESPONSE: SUPPORT, SUBJECT TO COMMENTS
- 4.93. Vistry **support** the policy approach set out in Policy IN2, IN4, IN5 and IN7.
- 4.94. Vistry's preferred scenario for development at Fairoaks Airport is for a residential-led scheme of 1,600-1,800 residential dwellings. This is the most sustainable option for the site that, as a result of the level of the residential development proposed, will enable the required infrastructure to come forward to meet the needs of residents both on-site and in the wider area.
- 4.95. An update note (Appendix 5a) to accompany the Transport Feasibility Appraisal accompanies these representations. Vistry will deliver a scheme that is policy compliant with Policy IN2, with sustainable transport maximised both within the site and inwards and outwards of the site. The indicative masterplan for the preferred scenario shows provision for pedestrian and cycle access both into and across the site, that will be delivered in combination with associated infrastructure.
- 4.96. Vistry's preferred scenario for development of Fairoaks Airport will deliver a policy compliant range of community facilities, as set out in the outline of proposals within paragraph 2.11 and within the Vision document that accompanies these representations. The preferred scenario's delivery of 1,600-1,800 residential dwellings will support the delivery of these community facilities, creating a truly sustainable development that can meet the needs of residents and the wider borough.
- 4.97. The preferred scenario for development put forward by Vistry, as well as the two alternative options for development, all deliver a comprehensive network for green infrastructure. Further information can be found within the Landscape and Green Belt Appraisal (Appendix 3) produced by Stantec.

4.98. As part of the extensive community facilities delivered on-site, a sports hub accompanied by playing pitches will be delivered on-site, which satisfies the requirements set out in Policy IN7: Indoor and Built Sports and Recreational facilities.

4.99. **REQUEST: No changes are proposed as part of this consultation response.**

Policy E1: Thames Basin Heaths Special Protection Area

4.100. SUMMARY OF VISTRY RESPONSE: SUPPORT SUBJECT TO COMMENTS

4.101. Vistry **supports** the aim of the Council approach for the Thames Basin Heaths Special Protection Area. However, whilst no specific policy wording needs to be changed, Vistry raises a Plan delivery question, in respect of Suitable Alternative Natural Greenspace (SANG) supply.

4.102. Although Vistry note that Section 3 of the Topic Paper identifies potential SANG options for meeting needs of the new Local Plan, it is questioned whether or not they are suitable and deliverable within the timescales required to serve the residential allocations proposed in the Local Plan. Vistry also question if all of the potential SANG being considered by SHBC will be sufficient to serve all of the residential development being proposed in the emerging Local Plan.

4.103. As part of its proposals for a new settlement at Fairoaks, Vistry will make provision for a significant amount of green infrastructure. Fairoaks is located 460 metres to the south west of the SPA and, as a result, will make provision for on-site strategic SANG (up to 32ha for the preferred scenario to mitigate residential development and a further 25ha of additional SANG) as an integral part of development to mitigate potential recreational impacts on the SPA and provide excess capacity to facilitate other housing development within a suitable catchment. Additional SANG capacity, as set out in 'Figure 1: SANG capacity East of the Borough' of the Thames Basin Heaths SPA Topic Paper, is at a much lower level of SANG capacity in the East of the borough over the Plan period and additional capacity in the eastern half of the borough should be a key requirement for SHBC, particularly if the Local Plan period is extended in line with Vistry's response to Policy SS1: Spatial Strategy.

4.104. **REQUEST: No changes proposed to Policy E1, however SANG provision set out in the evidence base demonstrates that a site allocation at Fairoaks will be able to contribute to an improved buffer of SANG.**

Policy E2: Biodiversity and Geodiversity and Policy E3: Biodiversity Net Gain

4.105. SUMMARY OF VISTRY RESPONSE: OBJECT

4.106. Vistry consider Policy E3 to be **unsound**.

4.107. As currently drafted, Vistry consider that the policy is **not justified**.

- 4.108. Vistry fully support the aims of Biodiversity Net Gain (BNG) and support the national mandatory 10% net gain requirement and where possible seek to deliver BNG in excess of this, subject to viability. However, the provision of any net gain above the 10% mandatory requirement must be expressed in policy as an aspiration rather than a requirement. The draft policy is therefore not supported.
- 4.109. It is important that there is sufficient flexibility to allow for site specific circumstances to be recognised in relation to the ecological baseline. Some sites may have a very high baseline and therefore achieving even the mandatory 10% net gain will be challenging. It is very unlikely that the site baseline assessments will have been completed for the proposed allocations at the time the viability assessments are undertaken.
- 4.110. The Biodiversity Net Gain Planning Practice Guidance (PPG) states that “Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified.” In the supporting text of Policy E3 at paragraph 6.30, SHBC reference the Surrey Nature Partnership’s report ‘The State of Surrey’s Nature’ (2017). The findings in this report provide context for biodiversity within Surrey, which Vistry do not contest. It should be noted however that the report was authored in 2017, so does not reference mandatory Net Gain requirements as set out under the Environment Act 2021.
- 4.111. SHBC’s Local Plan Viability Assessment does include within it’s testing the requirement of Policy E3 for 20% BNG, and Vistry note the significant increased cost for delivery of 20% BNG on greenfield versus brownfield land. Vistry’s concern is that when the entire ‘menu’ of developer costs are calculated together, such as the significant need for affordable housing in the borough, the requests put on developers becomes onerous beyond reason.
- 4.112. Vistry are also concerned that there is little evidence to show that 20% is viable in practice, with few Councils adopting a similar approach especially where land values are so high. The Biodiversity Net Gain requirements have been in place for roughly six months, so it is too early to tell as to whether this is policy that is workable in practice.
- 4.113. Vistry support the reference to the mitigation hierarchy in terms of off-site delivery. In relation to the preference for on-site BNG, it is essential that flexibility is allowed for within the policy to take account of site-specific circumstances and that it is recognised that some habitats may not be able to be re-provided on-site and therefore off-site provision may be entirely appropriate. There will also need to be viability considerations in relation to off-site vs on-site provision and the policy must allow for this.
- 4.114. **REQUEST: Point 1 of Policy E3 should be amended to read:**

*Qualifying development proposals will be permitted provided that they can demonstrate the provision of **the national minimum target** biodiversity net gains of at least 20 **10** per cent, ~~or the advised national minimum target, whichever is greater,~~ measured using the statutory Biodiversity metric. Any off-site habitat creation or enhancement measures must be in line with the hierarchy in this policy, within Surrey Heath Borough, unless demonstrably unfeasible.*

Policy GBC1: Development of new buildings within the Green Belt

- 4.115. SUMMARY OF VISTRY RESPONSE: OBJECTION
- 4.116. Vistry consider Policy GBC1 to be **unsound** as the policy is **not justified**.
- 4.117. The wording of Policy GBC1 echoes national policy wording as set out in the NPPF, so these comments do not object to the wording of Policy GBC1 per se. However, Vistry do object to the allocation of the Fairoaks Airport site as Green Belt as set out on the proposed Policy Map and comments are included below that further explain Vistry's position.
- 4.118. As it stands, the policy risks being ineffective as new development in the Green Belt is by definition, 'inappropriate', subject to a few exclusions as provided in the NPPF. Instead, major development sites (such as the Previously Developed Land at Fairoaks) should be removed from the Green Belt on the basis of evidence (as outlined in separate representations) in order to make suitable use of the previously developed land within Green Belt and in recognition of the Government's proposal for 'Grey Belt' which now amount to a material consideration at examination. Vistry want to make clear that the majority of the built development at Fairoaks would be located on previously developed land.
- 4.119. Paragraph 60 of the NPPF states that in order to deliver a sufficient supply of homes, a sufficient amount and variety of land should come forward where it is needed and so that the needs of groups with specific housing requirements are met. In line with comments made against Policy SS1, SHBC need to allocate additional sites for housing now to address a historic shortfall in affordable housing and also to address a revised Local Plan period that should be aligned with the anticipated adoption of the Local Plan in 2024 and run to 2040.
- 4.120. SHBC are pursuing a spatial strategy that allocates most new development within existing urban settlements. The Local Plan Viability Assessment (2024) sets out that the delivery of affordable housing in these locations cannot meet the boroughwide aspiration of 40% delivery and therefore urban site allocations are required to deliver a lower percentage of affordable housing of 20-25%. Vistry have produced further evidence in representations responding to Policy HA2 and HA3 that demonstrates that the level of affordable housing proposed at the planning application stage of urban regeneration schemes is further reduced. Vistry maintain that a site allocation at Fairoaks would address this issue, as larger sites play a positive role in terms of delivering affordable housing, both in terms of quantum and the overall housing mix that is delivered.

4.121. Furthermore, the Employment Market Update (**Appendix 6**) sets out that the light industrial and industrial markets continue to be supply constrained, no new completions of industrial or light industrial premises since 2022. In terms of the demand for each sector of employment space, demand has remained particularly strong in the light industrial sector and steady in the industrial sector since 2022, whilst demand in the office sector turned negative. Much of the new pipeline for employment space in the borough is coming from the redevelopment of existing floorspace, which will not increase floorspace overall and will not significantly alter the provision of each employment sector in light of demand for office space decreasing. Vistry are proposing that Fairoaks delivers over 10ha of additional light industrial and industrial floorspace which will meet existing demand.

4.122. **REQUEST: SHBC should consider deleting the policy as it adds nothing beyond national policy / Environment Act, therefore it is superfluous.**

Policy GBC2: Development of existing buildings within the Green Belt

4.123. SUMMARY OF VISTRY RESPONSE: OBJECTION

4.124. Vistry consider Policy GBC2 to be **unsound** as the policy is **not justified**.

4.125. Vistry has submitted representations to Policy ER2 supporting the designation of Fairoaks as a Strategic Employment Site, but that the employment site at Fairoaks along with the wider development area which is proposed as part of the new settlement, be removed from the Green Belt by SHBC. This is a fundamental point in order to fulfil its role as a strategic, sub-regional driver of growth and address the ongoing shortage of employment land that is not addressed in the draft Local Plan.

4.126. In particular, Vistry requests that Policy GBC2 and the policy wording allow for the redevelopment and regeneration of defined employment sites in the Green Belt. This should include the intensification and expansion of uses / buildings of facilities that meet the needs of the market, such as light industrial and industrial uses, as stated in Point 2 of Policy ER2.

4.127. It should also be noted that equestrian uses will be retained.

4.128. Vistry would also like to reiterate the Labour government's introduction of the 'Grey Belt' and the material consideration that this concept now affords. The employment space at Fairoaks is designated as Previously Developed Land (PDL) and performs weakly against the purposes of Green Belt as set out in the NPPF, therefore highlighting the site as suitable for release for development.

4.129. **REQUEST: Vistry's preferred approach for Fairoaks is that land, including the existing Strategic Employment Site land, is released from the Green Belt as shown in in the Green Belt Removal Plan (Appendix 2b). However, it is recommended that there is greater cross-reference between Policy GBC2 and Policy ER2 to enable the regeneration/redevelopment of these sites (including the expansion of existing buildings) for employment uses, where they do not cause material harm to the openness of the Green Belt.**

DH2 – Making Effective Use of Land

4.130. SUMMARY OF VISTRY RESPONSE – SUPPORT SUBJECT TO COMMENTS

- 4.131. Vistry do not object to the policy, rather are only seeking to comment. Vistry support the effective use of land in line with the NPPF. There is 49ha of Fairoaks which is previously developed land and it is in this location where the majority of development is proposed. Thus, overall the policy is **supported**.
- 4.132. Policy DH2 contains a range of minimum densities for locations identified within the spatial strategy. Fairoaks is a discounted site and lies outside of any of the settlement areas included in Policy DH2, however the preferred scenario for development at Fairoaks has been developed at a range between 37.5dph to 42dph, which allows for a broad range of housing types whilst making efficient use of land.
- 4.133. **REQUEST: No changes are requested to the policy.**

DH7 – Heritage Assets

4.134. SUMMARY OF VISTRY RESPONSE – SUPPORT SUBJECT TO COMMENTS

- 4.135. Vistry does not wish to make any comments about the wording of Policy DH7 but does wish to note the following points insofar as this Policy relates to its proposals for Fairoaks. Previous representations were made on behalf of ADP in relation to SHBC's Draft Heritage List consultation (2024). This document sought to locally list two hangar buildings and the control tower. Vistry do not consider these buildings appropriate of locally listing.
- 4.136. The Chobham Transport Strategy (Appendix 5c) produced by Vectos and which accompanied Vistry's (then Countryside) proposals for Fairoaks at the Regulation 18 stage consultation identified a number of urban realm improvements which seek to encourage a change in travel behaviour. An associated Heritage Note by Wessex Archaeology also identifies that such urban realm improvements will allow for the preservation and enhancement of the Chobham Conservation Areas (**Appendix 5b**).
- 4.137. The Illustrative Masterplan for Fairoaks (see Vision Document) identifies that the key remnant landscape features associated with Ottershaw Park are retained and incorporated into the proposals, in particular the woodland and Little Blackmole Pond on the eastern boundary, Samson's Wood and Long Copse, the parkland trees, and the remaining field divisions within the eastern part of the Site. The majority of the remnant parkland will form SANG, remaining as natural greenspace, with the evident landscape framework informing the structure of the landscape proposals, and providing the basis for the sympathetic enhancement.
- 4.138. **REQUEST: No changes requested to Policy DH7.**

Proposals Map & Mapping Booklet

- **General Designation of the Green Belt**
- **Map 18: Fairoaks Airport and Chobham Business Centre, Proposed Policy ER2 Strategic Employment Site Boundaries and RE17**

4.139. SUMMARY OF VISTRY RESPONSE: OBJECTION

4.140. This objection should be read in conjunction with Vistry's other objections, notably to Policies SS1 and ER2. These objections request that:

- The land promoted at Fairoaks should be removed from the Green Belt and allocated for housing-led new settlement (Vistry's Preferred Scenario A);
- At the very least, the employment area should be removed from the Green Belt because national policy makes clear that land should be included in the Green Belt where it meets the defined purposes. At Fairoaks, which includes previously developed land, the inclusion of land identified for employment use (and the wider area which is proposed by Vistry for residential development with supporting uses) does not meet these purposes; and;
- The total site area for the Strategic Employment Site at Fairoaks be increased in size to 14.5 hectares.

4.141. SHBC has already engaged Exceptional Circumstances, through other Green Belt alterations. Vistry presents its case for Exceptional Circumstances in **Appendix 4**.

4.142. Vistry has produced a suite of plans to support its responses to the Local Plan consultation, including in relation to Policy ER2. These plans include the following:

- Proposed Changes to the Policies Map (**Appendix 2a**)
- Employment Comparison (**Appendix 2c**).
- Framework Plan (**Appendix 2d**)

5. Responses to the Sustainability Appraisal of the Surrey Heath Local Plan – SA Report (June 2024)

- 5.1. **Vistry supports the inclusion of Fairoaks as part of Growth Scenario 2 assessed in the Sustainability Appraisal (SA).**
- 5.2. **There are however a number of aspects relating to Fairoaks that require revision and correction. On that basis, objections are also made to the SA in its current form.**
- 5.3. In particular, the SA does not assess the full scale of development and range of land uses which are being promoted at Fairoaks. For an accurate assessment of the sustainability of proposals for the site and the benefits arising for the Emerging Local Plan, it is essential that all aspects are considered.
- 5.4. Vistry would therefore like to caveat that the comments provided in Section 5 relate to the commentary put forward in the SA (2024) and the two Growth Scenario's and that notably, Growth Scenario 2 only assess a redevelopment option at Fairoaks of circa 1,000 residential dwellings. Vistry consider that if SHBC were to pursue the preferred scenario of a development of 1,600 residential dwellings at Fairoaks, that this alternative would deliver the critical mass of infrastructure to achieve a more sustainable development that maximises benefits for both residents of the new development and the wider region.

Objection: Growth Scenario 2

- 5.5. As outlined in **Section 2** and within the Vision Document (**Appendix 1**) the proposals for Fairoaks comprise the following (based on Preferred Scenario A):
- Approximately 1,600 homes, including a variety of housing and at least 40% delivery of affordable homes (i.e. approximately 640 affordable homes).
 - An employment area of approximately 14.5 hectares (Classes B2, B8 and E (g), including the opportunity for film studios).
 - 2FE primary school.
 - Local Centre, including retail and a community centre.
 - 12 gypsy and traveller pitches.
 - Sports Hub comprising multi-use playing pitches and a pavilion building.
 - A multifunctional network of green and blue infrastructure, including open spaces, equipped children's play areas, and the retention and protection of high quality habitats.
 - Creation of up to 57 hectares of Suitable Alternative Natural Greenspace (SANG).
 - A new spine road between the A319 and A320.
 - Cycle links and footpath connections to the wider area.

- A Mobility Hub providing a focal point for public transit options, active travel, EV charging and other complimentary uses
- 5.6. Vistry asserts that the SA should be altered to correctly assess the proposals at Fairoaks as part of Growth Scenario 2, in order to ensure that the Local Plan is prepared on the basis of accurate evidence and is more likely to be found sound at examination. This representation has confirmed that the development, comprising the above, is capable of being delivered over the plan period. There is no reason why a reduced quantum of development should be applied to the Plan and there is insufficient evidence produced as part of the Emerging Local Plan to support SHBC's position on this.
- 5.7. In this regard, it is clear from the evidence provided to SHBC to date that the entire scheme delivering 1,600 homes is capable of being delivered over the plan period. The details in section 2 of this representation further confirms this and SHBC's acknowledgement of Vistry's placement as the Master Developer and "substantial experience" in "delivering large-scale projects" (paragraph 6.3.43 of the SA) further indicates SHBC's understanding that this is the case.
- 5.8. Vistry's proposed scenario A would not only deliver more housing, but also provide a greater level of employment and community offerings. This is a deliverable scheme with commitment from a national housebuilder, that is capable of helping SHBC to address the identified development and housing needs in the borough in the long term, and notably over a revised Local Plan period of 2024 to 2040 which is considered necessary in light of the representations above. In this regard, the fact that the Standard Method (as currently drafted as part of the NPPF consultation) goes up by over 100% (from 320 to 658 dpa) is significant, as is the fact that if the plan period was changed as recommended above, the housing shortfall would be in excess of 4,500 homes.
- 5.9. **On this basis, Vistry objects to Paragraph 5.5.3 of the SA which assumes that up to 1,000 homes would come forward over the plan period.**
- 5.10. **REQUEST: Action required: In order to ensure that the Local Plan is justified on the basis of proportionate evidence, the quantum of development coming forward at Fairoaks as part of Growth Scenario 2 must be corrected throughout the SA and all references to Growth option 2, to reflect the scheme details set out at paragraph 5.4 above.**
- 5.11. **REQUEST: Action required: A further SA must be carried out of Growth Scenario 2 to account for the correct proposals at Fairoaks. This must be done prior to the Examination of the Local Plan to ensure that it is effective, positively prepared and justified.**

Growth Scenario 2: Recommended changes

- 5.12. As set out above, it is necessary for Growth Scenario 2 to be amended to reflect the proposals presented by Vistry at Fairoaks under Scenario A – namely delivery of 1,600 homes and in light of the proposals set out above in paragraph 5.4. The following therefore provides an alternative assessment of Growth Scenario 2 which should be used to inform the Emerging Local Plan.
- 5.13. Vistry considers that the details below demonstrate not only that the development opportunity is the most sustainable option for SHBC to adopt, but also that by taking forward this revised Growth Scenario, SHBC will ensure that the Local Plan delivers sustainable development in the long term, which is essential if the plan is to be positively prepared and therefore capable of being found sound at examination.
- 5.14. For the avoidance of doubt, and for ease of comparison, the table below has been prepared to reflect the structure of the tables included in SHBC's Sustainability Appraisal, and shows only the proposed amendments to Growth Scenario 2 (column 3) in comparison to the published assessment of growth scenario 2 at 2024 (column 2).
- 5.15. Of primary importance in relation to the below is that if the growth scenario were amended to incorporate the larger development at Fairoaks (Vistry's Scenario A for 1,600 homes), this would increase housing provision from 7,012 dwellings to 7,612 dwellings (subject to amendments in the supply tested on the basis of any revised plan period). This would provide much needed housing at a higher rate, that is not only required for the borough, but that is also deliverable owing to the commitments at Fairoaks. On that basis, the spatial strategy should also be altered to ensure that development needs are met by the Local Plan, and to recognise the significant opportunities and benefits arising from the greater proposals at Fairoaks.
- 5.16. Further to this, it would also be necessary for the summary tables and associated text which identifies the scale of the reasonable growth scenarios, notably Tables 5.1 and 6.1 to be amended.

Key (as per the SA 2024 page 61):

- 1 = preferred scenario
- **Red** = significant negative effect
- **Amber** = negative effect of limited or uncertain significance
- **Light green** = positive effect of limited or uncertain significance
- **Dark green** = significant positive effect
- No colour = neutral effect

SA Topic	SA 2024 - Published Growth Scenario 2: Constant +Fairoaks	Vistry Revised Growth Scenario 2 Assessment
	Rank of Preference and categorisation of effects	
Accessibility	2	1
Air Quality	2	2
Biodiversity	2	1
Climate Change adaptation	1*	1*
Climate Change mitigation	2	1
Communities	1*	1*
Economy and employment	1*	1*
Historic environment	2	2
Housing	1*	1*
Land, soils, resources	1*	1*
Landscape	2	1
Transport	2	Review Scoring
Water	1*	1*

- 5.17. In relation to the above, the following sets out the reasons for the amendments above and provides both comments, support or objections to the SA for Growth Scenario 2 in its current form.
- 5.18. Based on the following responses provided below by Vistry, the rank of preference and categorisation of effects for Growth Scenario 2 should, where identified by Vistry, be revised in order to reflect the greater sustainability of the Fairoaks proposals (i.e. based on the scale of development and the delivery timescales identified by Vistry).

Accessibility: Object - Amended scoring required

- 5.19. Vistry **object** to the scoring of Growth Scenario 2 with specific regard to the proposals at Fairoaks. The SA assessment has concluded a neutral 2 score, which is not considered to accurately reflect the proposals at the site or the significant benefits that will arise. This is particularly the case when considering the scheme at Fairoaks will deliver a high quantum of development than has been considered by SHBC, and as set out in paragraph 5.4 above. This includes associated community facilities, all of which can be delivered at the site and will help to ensure the garden community is sustainable, and is as self-sufficient as possible.
- 5.20. With regards to SHBC's comments on education (paragraph 6.2.9) previous work has identified that the Garden village at Fairoaks would likely yield 180 secondary school pupils. The fact that no secondary school is proposed to be delivered on site is not considered to affect either the sustainability or self-sufficiency of the site overall. This is particularly the case given that secondary school children generally tend to travel further for school than primary school students, and that surplus capacity has previously been identified in Surrey Heath, Woking and Runnymede. A primary school is to be provided on site serving the development. Going forward, Vistry will work with SHBC and Surrey County Council to understand any future needs arising in respect of secondary provision, however, this is not currently seen as a Plan requirement at this stage, and should not, as a result, affect the scoring for the site and growth scenario.
- 5.21. On this basis, the table above includes a revised score for Accessibility of "neutral 1" which is considered to be a fair and more accurate score for Growth Scenario 2 when considering the proposal at Fairoaks as a whole. It also reflects the outcome for Growth Scenario 1 and the neutral effects predicted for both scenarios stated in paragraph 6.2.11.
- 5.22. **REQUEST: Action Required: Adopt the revised scoring for Growth Scenario 2 proposed in this representation to accurately reflect the proposals at Fairoaks.**

Air Quality: Comments

- 5.23. Vistry supports the fact that the SA confirms existing air quality conditions within and near to the site are comfortably within relevant air quality objectives set to protect human health. It also acknowledges that air quality will continue to improve as the use of zero emission electric vehicles increases.

- 5.24. Thus, whilst Vistry is generally supportive of the conclusions drawn in respect of Air Quality, and considers that the same position would apply to Growth Scenario 2 with the increased development at Fairoaks, it is important for SHBC and the SA to also take into account the reduction in emissions from aircraft and road traffic movements associated with the airport closure, required to facilitate the Fairoaks development.
- 5.25. In addition, the SA should take into account the significant opportunities for air quality benefits arising as a result of development at Fairoaks, relating to, for example, building design, energy efficiency, measures to reduce road traffic and to encourage the use of low emission vehicles, intelligent use of green infrastructure, and improvements to local transport infrastructure. An alternative approach is outlined in Vistry's Air Quality evidence (**Appendix 7**) and this should be considered as part of the SA and Examination process.
- 5.26. **Action Required: Give due regard to the background evidence supplied by Vistry and update the SA text accordingly (acknowledging that scoring would unlikely be affected).**

Biodiversity: Object – Amended scoring required

- 5.27. Vistry **object** to the scoring of Growth Scenario 2 and considers that this must change to “Amber”, even when considering the larger development at Fairoaks.
- 5.28. Vistry supports SHBC's acknowledgment of the positive impacts arising from development of the site, in respect of recreational pressures on the TBHSPA and habitat creations at the site (paragraphs 6.2.21 and 6.2.22) it is of concern that so much emphasis has been placed on the potential impacts of development on the Common (Paragraph 6.2.23). Vistry does not consider that such impacts will be as significant as the SA indicates, and evidence submitted to SHBC throughout the Emerging Local Plan process clearly demonstrates this. The fact that paragraph 6.2.23 acknowledges the recent change of status of Horsell Common to “favourable” is also relevant and supports Vistry's position.
- 5.29. Furthermore, paragraph 6.2.25 refers to the strategic SANG that will draw new residents away from the SPA and the possible benefits of this. Paragraph 6.2.26 also concludes that there is potential to deliver strategic targeted enhancements. Further limits on harm to biodiversity include the high level of self-containment which is envisaged by the proposed development, the intended scale and quality of the proposed SANG, and the proposed biodiversity net gain which will be delivered at Fairoaks.
- 5.30. Despite this, the scoring remains negative, and Vistry does not consider this to reflect either the wording of the SA or the evidence available to SHBC. It is accepted that some impacts may be either limited or unknown, but the evidence is also clear that many impacts either will be mitigated or that there will be significant benefits arising as a result of the development.

5.31. Vistry also objects to the ‘secondary concern’ expressed at Paragraph 6.3.24 that the proposed development will impact on land which has a ‘clear former parkland character’. As stated in the Vision Document, the key remnant landscape features associated with Ottershaw Park will be retained and incorporated into the proposals (forming part of the SANG) and providing the basis for sympathetic enhancement.

5.32. **REQUEST: Action Required: Revise text for the SA objective on biodiversity and scoring to “Amber”.**

Climate Change adaptation: Support

5.33. Vistry **supports** the scoring of Growth Scenario 2 and notes that the conclusions reached in relation to Fairoaks would apply equally to the preferred development option set out in paragraph 5.4 above.

5.34. Vistry confirms that as part of any future planning application for Fairoaks, development will avoid those areas at risk of flooding (now and in the future as a result of climate change).

Climate Change mitigation: Object – Amended Scoring Required

5.35. Vistry **object** to the scoring of Growth Scenario 2.

5.36. Vistry objects to the question raised in the conclusion at paragraph 6.2.40 that questions whether development at Fairoaks represents an ‘opportunity’ to minimise built environment emissions by supporting heat networks and other measures, as referred to in Paragraphs 6.2.39. Vistry’s preferred scenario for Fairoaks meets the test set out in paragraph 159 of the NPPF that new development should manage risks through suitable adaptation measures, including through the planning of green infrastructure, and therefore is consistent with national policy and capable of being found sound on this basis.

5.37. Vistry also objects to the conclusion reached by the SA at Paragraph 6.2.40 that there is much uncertainty about the climate change proposals to be delivered at Fairoaks. For the avoidance of doubt, it is envisaged that Fairoaks will be built over a 8-year period and Vistry will commit to a strategy that will allow the development to mitigate and adapt to a changing climate over this period.

5.38. The strategy and commitments will need to be flexible to allow for changes in future technologies, regulation and changes in customer requirements. However, modern methods of construction and materials, as well as consideration regarding layout and building orientation, can ensure that buildings are resilient to climate change.

5.39. Subsequently, Vistry considers that no evidence has been put forward in the SA to deem Growth Scenario 2 as being the second preference to Growth Scenario 1 in respect of climate change. The larger proposals for Fairoaks will also not affect the position with regards to climate change mitigation as full details would be included in any future planning application to ensure a neutral, or at worst “amber” outcome.

- 5.40. **REQUEST: Action Required: Revise the SA and adjust scoring for this objective to 1 (preferred scenario). Impacts (ie “Amber” score) can remain unchanged.**

Communities

- 5.41. There are no comments in respect of communities. Clearly however a larger scheme at Fairoaks is capable of having improved benefits for the community which would be delivered. This could potentially result in a higher score of “significant positive effects” for Growth Scenario 2.

Economy and employment: Support with comments

- 5.42. Vistry **supports** the scoring of Growth Scenario 2, although considers that SHBC could look at the benefits of Fairoaks from an employment perspective in a more positive light. Notably, where reference is made to the rural location of the site at present, this rural nature would not be the situation if Fairoaks were developed as proposed by Vistry. This would provide an important location for businesses, economic growth and a new community. The interconnectivity between these uses would support each other and provide an important destination for future residents and businesses alike.
- 5.43. With specific regards to employment offer, Fairoaks new settlement would deliver new employment land with a number of employment uses and operators interested in the site. Vistry also note that the area of land which is proposed for employment (Appendix 2c) would deliver employment land which is of ‘strategic’ importance for the borough and wider area.
- 5.44. The proposed Strategic Employment Site at Fairoaks would extend to approximately 14.5 hectares under the preferred scenario for development (paragraph 5.4 above) and offer a wide range of employment uses and space that will enhance the economic offer of the borough and wider region. This includes Use Classes B2, B8 and E (g), including the opportunity for the use of land and buildings within the defined area as film studios.
- 5.45. As set out in the Addendum to 2022 Employment Market Update, the Council’s current assessment identifies that its need for employment space has increased to between 10.8 ha and 18.0 ha. The increased need for employment land is principally due to higher demand for industrial floorspace. The Surrey Heath Employment Land Technical Paper 2023 Update states that further intensification of Strategic Employment Sites should be considered in order to meet residual floorspace need for industrial uses to allow for greater churn and greater choice. Industrial uses are also considered to be better suited on out of town locations with appropriate connectivity to the strategic road network. The opportunity to deliver a film studios on the outskirts of London would also mirror increased activity related to studio/film production.
- 5.46. Overall it is clear that there are considerable economic benefits arising from the preferred development opportunities at Fairoaks (as per paragraph 5.4 above) and when considering these as part of Growth Scenario 2, it is clear that these positive outcomes will support the overall sustainability of the Emerging Local Plan. This is important when considering the need for the Emerging Plan to be justified by appropriate evidence as part of the tests of soundness and to have been positively prepared and consistent with National Policy – notably here in respect of supporting sustainable economic growth.

- 5.47. **REQUEST: Action Required: Revise the scoring for SA objective on Economy to at least “Light Green” – positive effects of limited or unknown significance.**

Historic environment

- 5.48. No comments are made in relation to this objective. Even with the preferred development option at Fairoaks being considered as part of Growth Scenario 2, there would be no anticipated change in respect of impacts.

Housing: Support with changes

- 5.49. Vistry **supports** the scoring of Growth Scenario 2. Fairoaks is a deliverable, suitable and available scheme of 1,600 units over an eight year period with commitment from a national housebuilder. The scheme is capable of helping SHBC to address the identified development and housing needs in the borough in the long term, and notably over a revised Local Plan period of 2024 to 2040 which is considered necessary in light of the representations in Section 4. A site allocation at Fairoaks would result in a Local Plan that is positively prepared and delivers housing to meet an identified need and therefore would be capable of being found sound at examination.
- 5.50. In terms of the housing requirement to be met, Vistry has responded to the relevant policies of the Local Plan requesting that the housing targets are increased to ensure the delivery of at least 5,120 new homes in the Borough between a new Local Plan period of 2024-2040. Table 4.2 in the representations Vistry set out above displays a revised total for the number of dwellings that Surrey Heath can demonstrate over a period between 2024-2040. This table removes completions, adds a lapse rate of 10% and reduces the supply of homes from Hart to 328 up to 2032 (41dpa x 8). This new calculation results in a total of 4,428 homes between 2024-2040 which results in a shortfall of 692. Table 4.2 therefore demonstrates that a site allocation at Fairoaks is required to meet the identified housing need for the Borough. The calculations set out here are against the current standard method – Vistry’s representations to Policy SS1 present a much more significant shortfall in housing supply should the Local Plan be examined against the draft NPPF.
- 5.51. This increased requirement should be reflected throughout the SA, including in this particular sub-section. It is essential that the SA considers this accurately in order to serve as the required proportionate evidence base required for the Plan to be found sound. At present there is a risk that further revisions will be required as part of the Examination Process, in order for the SA to accurately reflect housing needs and delivery through the Plan.
- 5.52. Furthermore, if the Plan Period is amended as suggested (i.e. from 2024-2040), with the revised housing target also being incorporated, it will be essential for the SA to consider this fully in order to justify the Local Plan and ensure it is capable of being found sound.
- 5.53. Vistry also agrees with the comments made at Paragraph 6.2.64 in relation to the substantial experience of Vistry in acting as Master Developer in terms of delivering large-scale projects and confirm that between 1,500-1800 homes can be delivered at Fairoaks in the Plan period. Vistry also confirm that 12 Gypsy and Traveller pitches will be delivered as part of its Fairoaks proposals.

Land, soils, resources

- 5.54. Vistry **supports** the scoring of Growth Scenario 2.
- 5.55. As noted in Paragraph 6.3.69, the proposed development at Fairoaks will utilise PDL which reflects the national objectives for PDL and new development contained within the NPPF. Importantly, this will help to ensure that the Emerging Local Plan is consistent with National Policy and therefore more capable of being found sound at examination.
- 5.56. With regards to the remainder of the site, this has been assessed as Grade 3b agricultural quality (as confirmed in the Agricultural Land Classification Assessment forming part of the previous Fairoaks Garden Village planning application in 2018). As a result, the proposed development will not result in the loss of best and most versatile agricultural land, and this can be concluded as being a benefit of the proposed development.

Landscape: Object – Changes required

- 5.57. Vistry **objects** to the scoring for this objective under Growth Scenario 2.
- 5.58. As set out in the Landscape and Visual Appraisal and Green Belt Review (**Appendix 3**), the Site makes limited contributions to Green Belt Purposes 1, 2, and 4 and some contribution to Purpose 3 only in parts. The Site's landscape varies from industrial and open airfield areas to agricultural fields and the River Bourne Valley, however the site overall is enclosed by the surrounding wooded and vegetated landscape. In response, the proposed development is landscape-led, aligning with Green Belt assessments for Surrey Heath and Runnymede. It will consider the positive features of the surrounding LCAs and reflect the findings of the 2021 Landscape Sensitivity Study. Development will focus on the 49ha of previously developed areas of the airport and its business park, minimizing impacts on key landscape attributes. The strategy includes enhanced green infrastructure and a transition from built areas to the wider countryside, respecting the Site's varied landscape sensitivities.
- 5.59. Vistry notes the comment at Paragraph 6.2.72 that supporting growth at Fairoaks “may give rise to relatively limited landscape concerns in the context of a constrained sub-region”. The SA should recognise the landscape benefits and mitigation that is possible as a result of the significant change to the countryside arising from a new development, noting the baseline, which for Fairoaks includes a substantial element of previously developed land.
- 5.60. For the reasons stated in relation to its objections to the Fairoaks site being included in the Green Belt, including the evidence provided in Stantec's Landscape and Visual Appraisal and Green Belt Review (Appendix 3) and Exceptional Circumstances Report (Appendix 4), it is considered that the scoring of Growth Scenario 2 is too high and should be reconsidered.

- 5.61. Required Action: Revise the assessment of Growth Scenario 2 in respect of landscape, taking into account the benefits that will arise at Fairoaks (particularly when considering the preferred development opportunity presented by Vistry). To reflect the landscape evidence and masterplan for Fairoaks, the scoring on landscape should be changed to 1 (preferred site) with a neutral (or at worst “amber”) scoring.

Transport: Comments and potential changes required

- 5.62. Firstly, the scoring should be reviewed on the basis of revised strategic transport evidence – compiled to justify any allocation of land at Fairoaks. Vistry has prepared evidence to assist with this, which could be utilised by SHBC and Surrey CC. The SA might well include a revised Growth Scenario, should the plan period be revised to 2024-2040 and allocations/ spatial strategy reviewed.
- 5.63. As noted in the supporting Transport FA prepared by Vectos and confirmed in the update note provided by SLR (Appendix 5a), the site performs well against each of the various tests that comprise the emerging draft Policy IN2. In this regard, Vistry consider the score that has been assigned to the Transportation elements of the SA undervalue the sustainability of the site. It is evident from the work prepared by Vectos and SLR that there are options available to ensure that the Fairoaks scheme will have access to a choice of transportation modes on site that is referred to in paragraph 109 of the NPPF.
- 5.64. **REQUEST: The scoring of Growth Scenario 2 is revisited taking the more holistic review that is referred to in the supporting TFA prepared by Vectos and the update note prepared by SLR.**

Water

- 5.65. Vistry **supports** the scoring of Growth Scenario 2 as it relates to Fairoaks.
- 5.66. In this regard, Vistry note the current assessment (as identified at Paragraph 6.2.90) of there being waste water treatment capacity at Chobham and confirm that waste water would either flow or be pumped from its proposed new settlement to the treatment works. Vistry also note and confirm that further details about its waste water strategy will follow, in consultation with discussions with statutory providers.
- 5.67. **REQUEST: No change is proposed to the scoring of Growth Scenario 2.**

END

FAIROAKS



A VISION FOR FAIROAKS GARDEN VILLAGE

SEPTEMBER 2024

Building a sustainable community: Our Vision for Fairoaks Garden Village

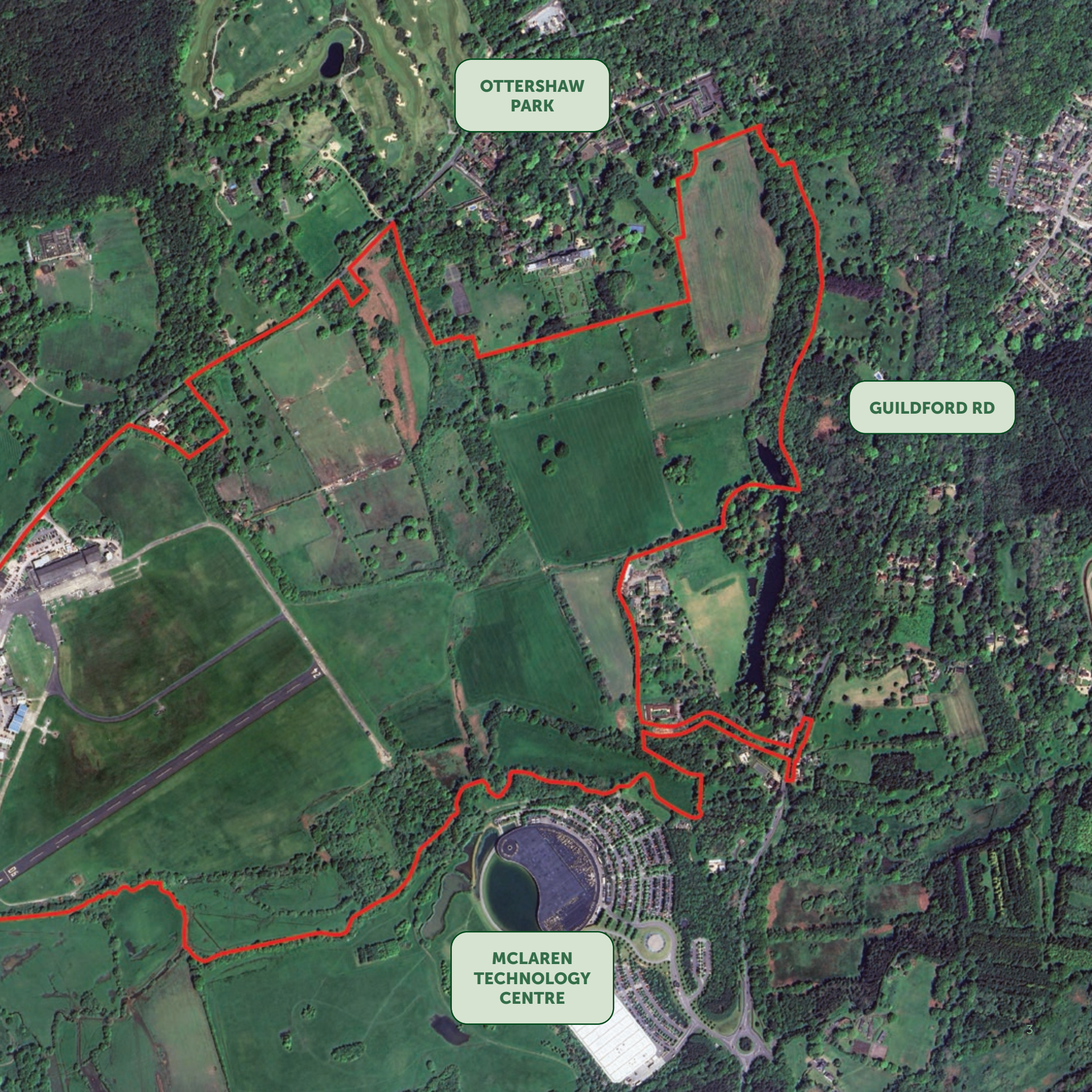
This vision document is prepared on behalf of the Vistry Group and details how a new village at Fairoaks Airport, located on the land between Chertsey Road and The Bourne, has significant potential to support Surrey Heath Borough Council in meeting present and future housing needs while delivering much-needed infrastructure including a new school and community facilities.

The Site is ideally located to support a landscape-led development, integrating green space and nature with new homes and sustainable design. Not only is this site in a distinctive setting, it is also ideally suited to provide benefits to the wider community with the delivery of homes that meet the needs of all residents, improving services such as roads and transport and protecting and enhancing the environment.

This document explains our vision for Fairoaks ‘The Secluded Village’; a development designed not just to provide homes, but also to deliver a range of environmental, social and economic benefits, enriching lives to create a thriving, sustainable community for generations to come.



CHERTSEY RD



**OTTERSHAW
PARK**

GUILDFORD RD

**MCLAREN
TECHNOLOGY
CENTRE**

3 KEY THEMES...

Shaping an identity for Fair Oaks through context and opportunity



A UNIQUE SURREY VILLAGE

A new village, fully enclosed by the existing natural features, Fair Oaks Village will fully embrace the principles of 'Garden Villages'. With leisure amenities on the doorstep, and services such as school and retail on site alongside significant numbers of new jobs, residents will enjoy a lifestyle where walking and cycling become the choice of convenience.



EMBRACING COMMUNITY

Fairoaks Village will offer diverse community facilities, improved infrastructure, and a variety of homes and tenures within extensive open spaces. It will feature leisure and recreational areas, including significant parkland accessible to the public for the first time. The landscape will integrate with existing parks and woodlands, adding to and creating a network of scenic walking and cycling routes, promoting active and healthier lifestyles by connecting various destinations.



CONNECTING NATURE

The development offers a remarkable opportunity to enhance the existing common lands, woodlands and parkland, by linking them together with the new SANG and new country park, opening up a large area of currently inaccessible/private land for public use. These will incorporate new planting, habitat restoration, and a significant uplift in biodiversity.

SET WITHIN A NATURAL LANDSCAPE

Amplifying Nature and promoting all its many benefits to create a healthy, happier, community. Fair Oaks Village presents an opportunity to provide the missing 'jigsaw' piece to connect and interlink the surrounding commons, parks and local facilities. Opening the site to public access will provide significant open space incorporating Suitable Alternative Natural Green Space (SANG). To improve and deliver additional habitats and ecology and give residents greater access to the countryside.

HOPSELL COMMON
CIRCULAR WALK



OTTERS SHAW

CHOBHAM COMMON

STANNERS HILL

CHRIST CHURCH, OTTERS SHAW

MILLER & CARTER

THE CASTLE INN

OTTERS SHAW GREAT PARK

THE SITE

MCLAREN PARK

FORD

MIMIBRIDGE MEADOWS

BOURNE FIELDS

HEATHER FARM CAFE

HORSELL COMMON

THE VICTORIA

ALL SAINTS CHURCH

THE SANDPIT

WEST BYFLEET STATION

WOKING

HORSELL

WOKING STATION



*Shaping an identity for
Fair Oaks through context
and opportunity to instill
a sense of place, purpose,
and community.*





OTTERSHAW HOUSE

Footpath's leading to Ottershaw Chase

Community Orchards and Allotments

Community events

Fairoaks win the cup!

ACCESS POINT

MCLAREN TECHNOLOGY CENTRE

WOKING STATION
4.5KM

Design Influences

Existing Features



Integrate Employment Uses



Respect the setting of Ottershaw House and Grounds



Previously developed land in the west



Runway



Iconic McLaren Technology Centre

Landscape, Character, Habitats and Settings



Nestled in a gentle bowl



Parkland setting related to Ottershaw Park



Meadow landscape along the Bourne



Fairoaks Common - Gateway between residents and the Park



Green and Blue Fingers



Runway Park

Sustainably Connected



Sustainable Transport Corridor
connecting destinations



Strategic linkages to Woking
Station



Mobility Hubs



Walkable Neighbourhoods



An integrated network of
PRoWs and routes

Community Heart and Employment Campus



Co-locating Primary School
and Local Centre



Consolidation employment
uses



Lower density along
sensitive edges



Higher density between
community heart and
employment hub

Scenarios with Room to Grow

Three land use scenarios have been developed for the site, with scenarios A and B representing a phased approach with potential for future growth and expansion of Scenario A. All scenarios have been designed to positively respond to the main opportunities and constraints of the site, accommodating existing employment and business uses and reference to previous use as an airfield.

Each scenario respects existing heritage assets such as Ottershaw Manor House, Ottershaw Park, and Wey Farm, and integrates the extensive woodland belts along The Bourne, mature trees, hedgerows, and landscape features to create a unique and distinctive place. The scenarios can deliver between 1,000 and 1,800 units, each including a 2FE primary school and a local centre, which collectively creates a community heart and destination on the edge of Ottershaw Park. All scenarios can provide sufficient SANG to meet its specific needs in accordance with Natural England standard of 8ha/1000 population based on 2.4 residents per dwelling. However, Scenario A and B offer the potential to provide additional SANG and community facilities, offering greater community benefit which could be advantageous given the proximity to the SPA.

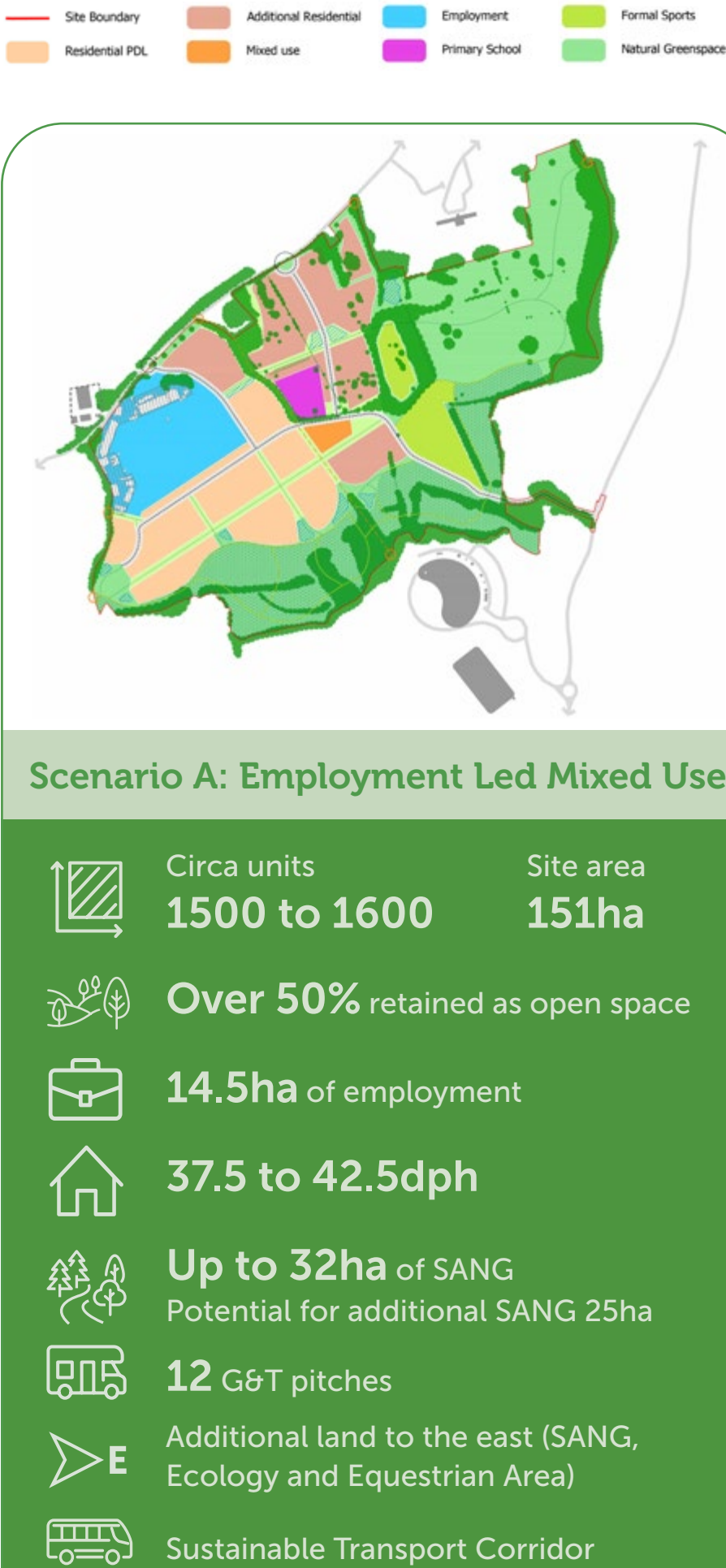
Scenario A: Employment Led Mixed Use is the preferred option as it provides the most effective use of the green belt creating a truly mixed-use development, while respecting existing landscape and heritage sensitivities. All scenarios could provide a viable transport service; however scenario A provides enhanced employment and community facilities.

Scenario B- Residential Led Mixed Use. is like Scenario A but reflects an alternative distribution of land uses and reduces the employment area to 10 hectares. This scenario achieves up to 1,800 units.

Scenario C- Grey Belt Proposal closely reflects the option tested by Surrey Heath Borough Council, and offers a reasonable alternative for inclusion in the local plan. This scenario primarily concentrates development on previously developed land in the west of the site within Surrey Heath.

These scenarios demonstrate that the masterplan framework is flexible and adaptable, and capable of accommodating different distributions of land uses, and can grow over time.

SANG can incorporate 14ha of lowland heath restoration.





Scenario B: Residential Led Mixed Use



Circa units
1700 to 1800

Site area
151ha



Over 50% retained as open space



10ha of employment



40 to 42.5dph



Up to 36ha of SANG
Potential for additional SANG 21ha



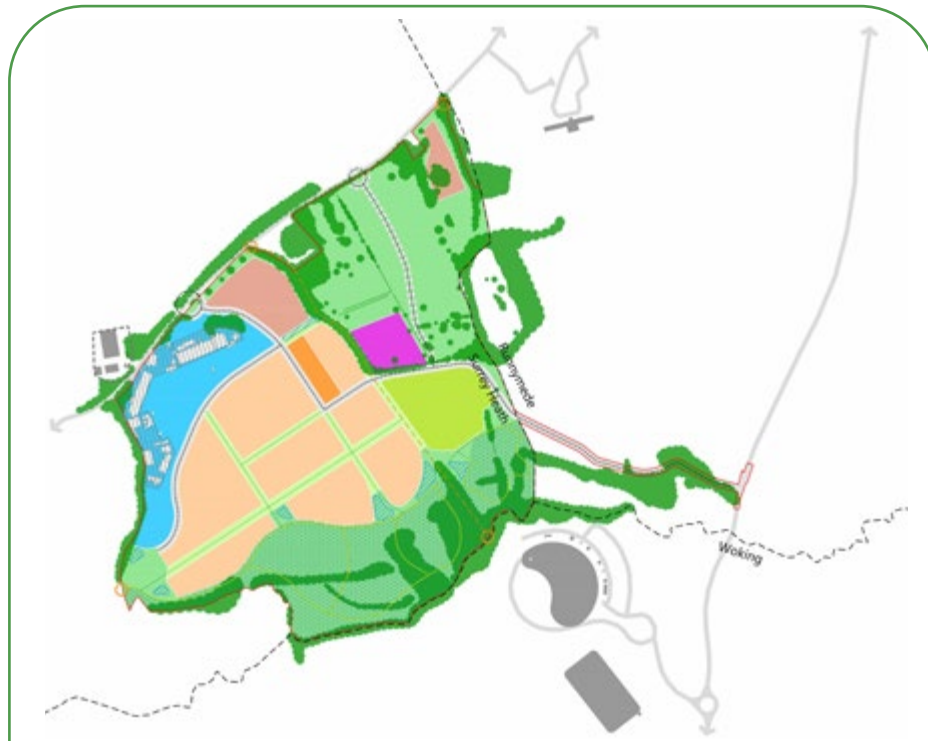
12 G&T pitches



Additional land to the east (SANG, Ecology and Equestrian Area)



Sustainable Transport Corridor



Scenario C: Grey Belt Proposal



Circa units
1000

Site area
100ha



Over 50% retained as open space



10ha of employment



40dph



21ha of SANG
Potential for additional SANG 18ha



12 G&T pitches



Focused on PDL Land



Sustainable Transport Corridor

A Landscape led Approach

Fairoaks Village will be a remarkable place. It will be designed to be a well-connected, enterprising 21st-century village community. The village aims to protect and create over 600 jobs across various employment types, while providing a wide range of homes to suit different tastes, ages, and incomes, and offer local governance and innovative social and economic services.

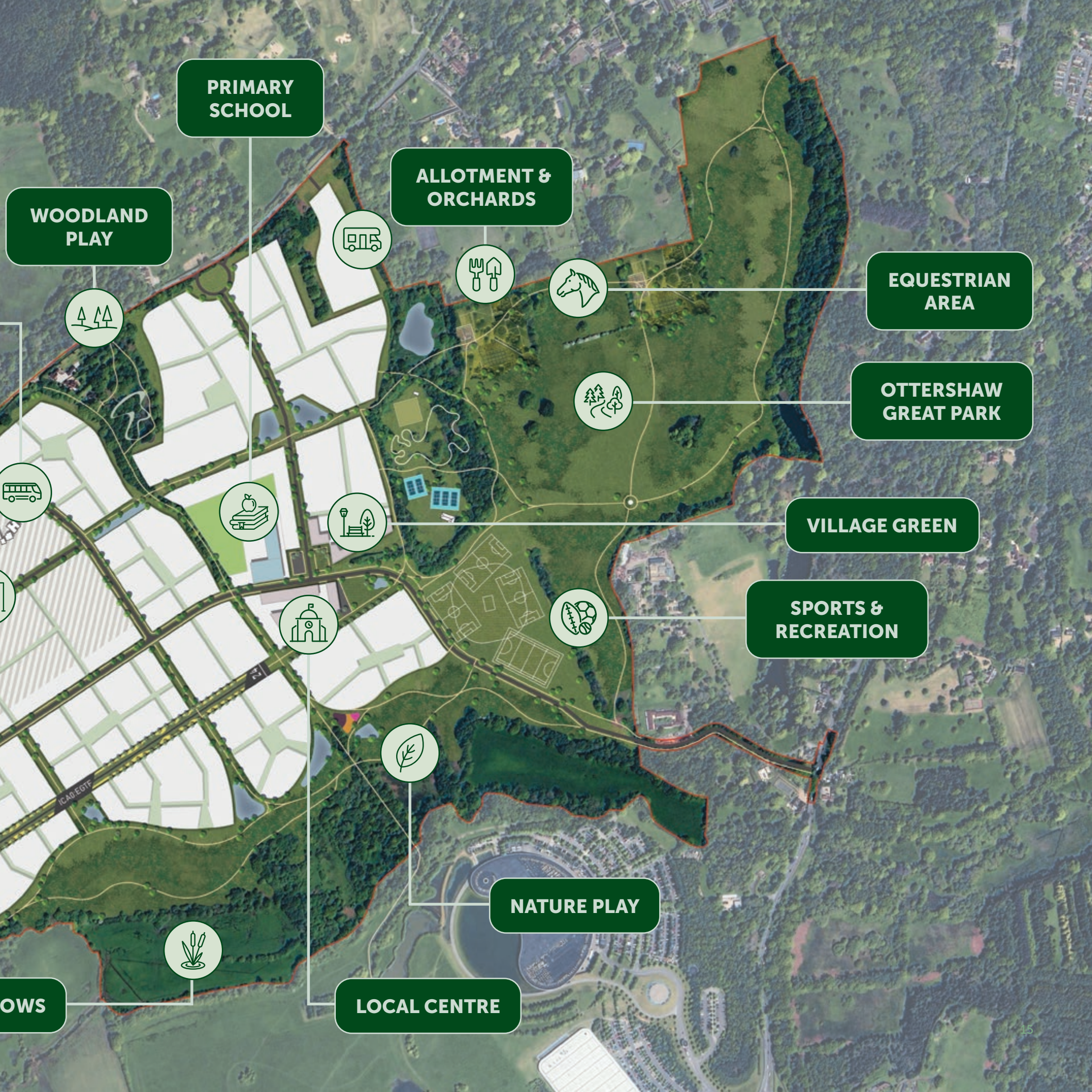
The masterplan includes a diverse mix of uses such as employment, housing, local retail and leisure space, community facilities, a school, and recreation space, creating a largely self-sufficient village that meets the day-to-day needs of its residents. This reduces the need to travel further afield, and fosters a vibrant community with diverse recreational spaces, drawing on the landscape character and heritage, combining areas for wildlife with spaces for play and leisure, amplifying the many benefits of nature for all.

This thoughtful design will evoke a strong sense of place and nurture a strong community spirit, encouraging residents to connect, engage, and support one another, making Fairoaks Village a place where everyone feels they belong and can thrive together.

The preferred vision for the site provides the following:

- Up to 1,600 new homes
- A 53ha Country Park (including over 29ha of park and recreation)
- A new 2FE primary school
- High quality sustainable transport corridor
- Up to 58,000 sqm of commercial space
- Local centre with space for retail, health and community facilities
- Over 4.5 km of cycle and footpath links
- 12 Gypsy and Travellers pitches





**PRIMARY
SCHOOL**

**WOODLAND
PLAY**

**ALLOTMENT &
ORCHARDS**

**EQUESTRIAN
AREA**

**OTTERSHAW
GREAT PARK**

VILLAGE GREEN

**SPORTS &
RECREATION**

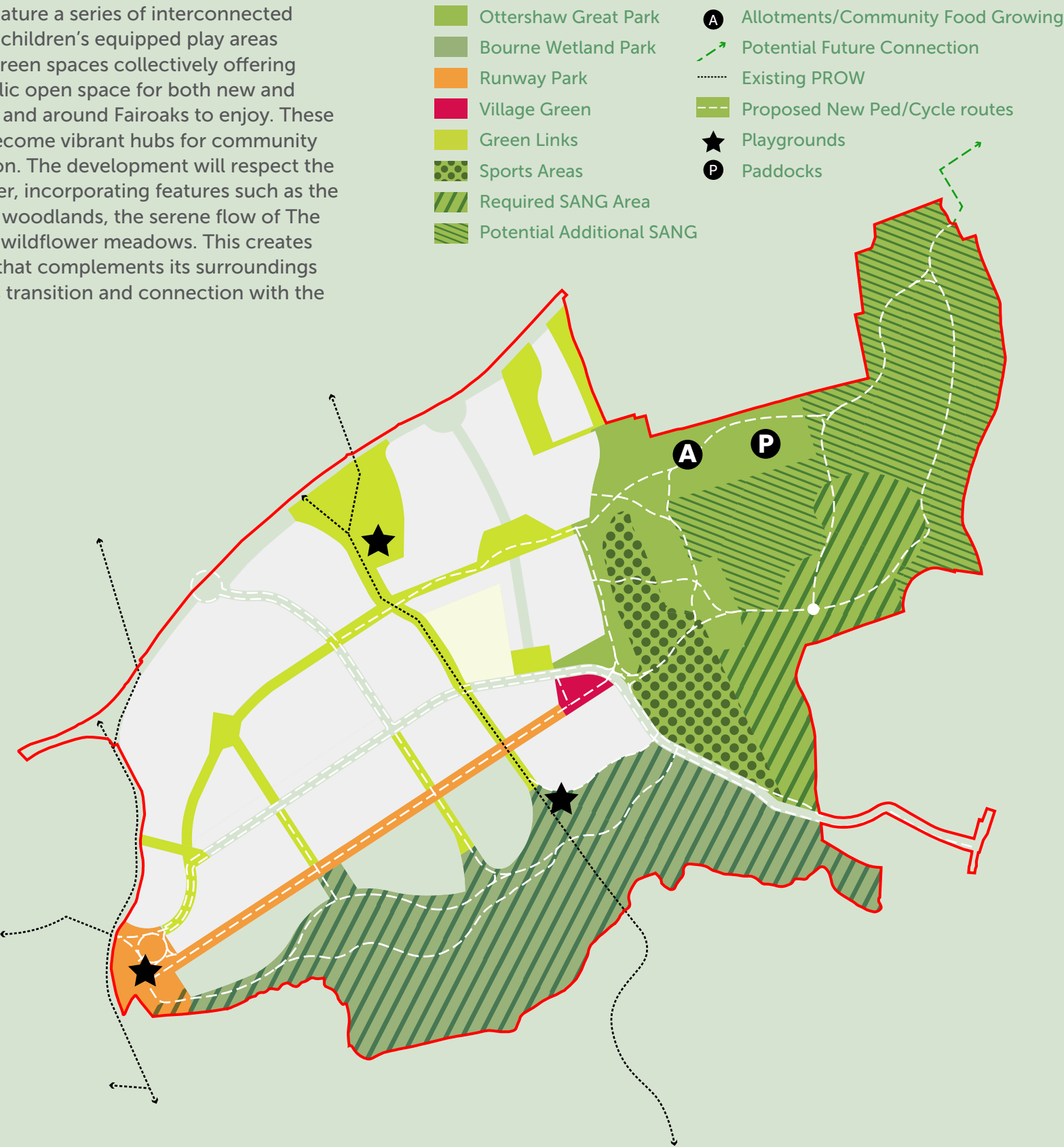
NATURE PLAY

LOCAL CENTRE

OWS

Key Spaces:

The development will feature a series of interconnected green spaces, including children’s equipped play areas and accessible natural green spaces collectively offering over 80 hectares of public open space for both new and existing communities in and around Fair Oaks to enjoy. These areas are designed to become vibrant hubs for community integration and relaxation. The development will respect the local landscape character, incorporating features such as the lush greenery of nearby woodlands, the serene flow of The Bourne, and the vibrant wildflower meadows. This creates a strong sense of place that complements its surroundings and provides a seamless transition and connection with the surrounding landscape.





Ottershaw Great Park

Spanning 53 hectares, Ottershaw Great Park is a new public space partly situated within the historic Ottershaw Estate. The park preserves many of the estate's historic features, including mature trees, existing vegetation, and scenic viewpoints.

Its primary focus is on enhancing biodiversity by creating quality habitats that people are encouraged to visit and enjoy. A series of pedestrian and cycle routes navigate through and around the park, including a potential new connection to Ottershaw.

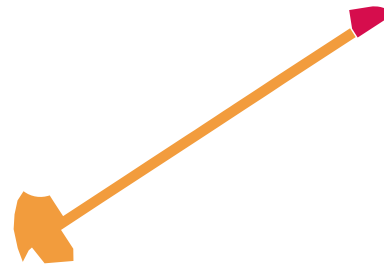
Planned amenities include sports facilities for the local community, such as cricket and football pitches, tennis courts, and possibly a bowls court, as well as a BMX pump track, allotments, and community food-growing areas.



Bourne Meadows

A diverse mix of meadows, woodlands, mature hedgerows and wetland habitats are found within Bourne Meadows. The River Bourne, that runs along the southern edge of the site, adds to the park's unique character.

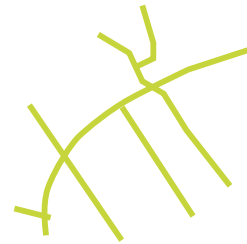
Spanning 27 hectares, the park is designated as Suitable Alternative Natural Greenspace (SANG), offering a variety of walking routes for residents and visitors to explore.



Runway Park

Runway Park, situated atop Fair Oaks Runway, reflects the site's aviation heritage by incorporating elements such as the 800-meter runway and runway numbers.

The park provides a strong green link from the local Centre and Village Green through the development. It features a range of amenities, including an adventure playground and a skate park located in the southwestern corner, offering recreational opportunities for visitors.



Green Connections

The site includes a network of green links that connect the development (and homes) to the larger green spaces at its edges, promoting active travel for both pedestrians and cyclists. These links also serve as areas for water attenuation.

Additionally, they enhance ecological connectivity, allowing wildlife to move freely between different habitats and supporting biodiversity across the site.

Landscape Analysis and Heritage Context

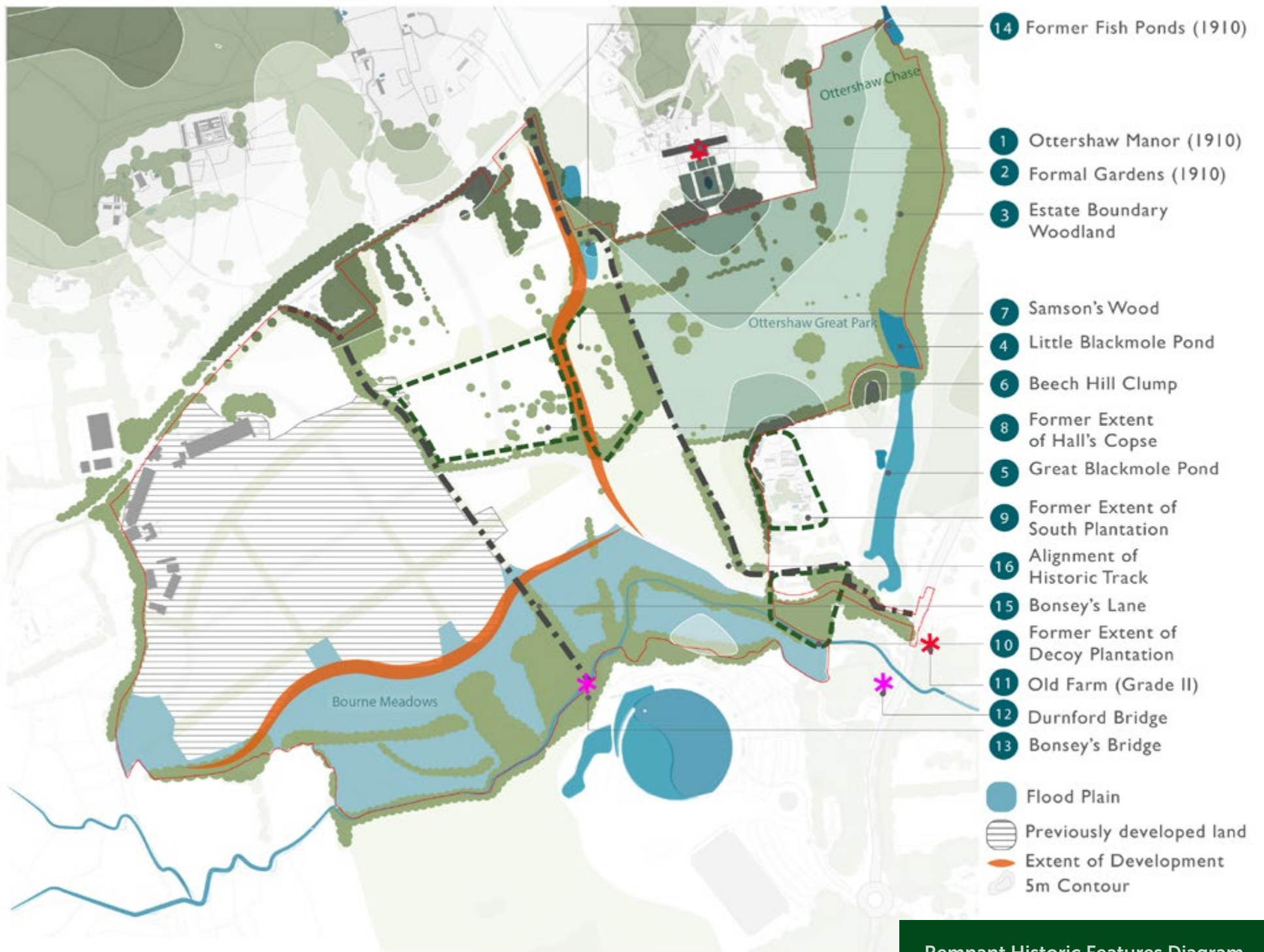
Landscape Analysis and Visual Context

- The site and surrounding area are located within the Metropolitan Green Belt. However, the Fair Oaks Airport buildings and associated business park, covering approximately 3.66 hectares, are designated as a Major Developed Site in the Green Belt. The site comprises 49 hectares of previously developed land. There are no other landscape designations covering the site, and it falls outside the Thames Heath SPA and its associated 400m buffer.
- The topography of the site is generally gently sloping, descending from higher land in the north to the valley of the River Bourne in the south, with elevations ranging from 30-40m AOD down to 20m AOD.
- The landscape surrounding the site features a substantial network of woodlands, copses, tree belts, and parkland throughout the valley floor and on the surrounding valley sides to the north, east, south, and west. These features, combined with the site's low-lying location, provide a strong degree of physical enclosure and visual containment.
- The landscape of the site and surrounding area is characteristic of the Settled and Wooded Sandy Farmland Landscape Character Type and the River Floodplain Landscape Character Type.
- Footpaths crossing the site connect with a wider network of footpaths and Public Rights of Way (PRoWs) in the surrounding countryside, providing connections to areas of Open Access Land, such as Horsell Common to the south.
- The combination of the substantial network of woodlands, copses, tree belts, and parkland, along with the gently undulating topography, provides a high degree of physical and visual enclosure to the site. The surrounding topography and vegetation substantially limit views of and into the site, with views generally restricted to partial views from immediately adjoining areas or distant glimpses from limited elevated locations around the site.
- The southern and eastern edges of the site are the most sensitive to visual impact, necessitating lower density development and a more fragmented built form in these locations.
- The existing floodplain associated with the River Bourne to the south of the site defines the extent of the development area.

Cultural Heritage

Ottershaw Manor, a Grade II listed building built in 1761 in a Palladian style, is located 130m north of the site, within remnant parkland. In 1910, the original mansion was demolished and replaced with a much larger building, accompanied by the extension of the formal gardens and the acquisition of Dolley's Farm, Durnford Bridge Farm, and Scotcher's Farm, which expanded the estate's landholding.

From 1914 to 1919, Ottershaw Manor was used as a military hospital. In 1930, the outlying farms were sold off, and in 1932, the manor became Ottershaw College before it closed in 1939 and became office headquarters. In 1948, following the end of WWII, the manor became a school again before being used as a care home from 1980. Therefore, from 1914 onwards, the manor exclusively served institutional purposes.



Remnant Historic Features Diagram



Parkland Formerly Associated with Ottershaw Park

Sustainable Transport and Connectivity

The NPPF is predicated on three central transport pillars that can broadly be encapsulated in the following statement:

“New developments should be located in areas that are well placed to encourage less reliance upon the private car, either through existing or proposed infrastructure, and be of a scale that is in keeping with the same. There is also an expectation that access should cater for the needs of all people in a safe manner”.

The opportunity that exists at Fair Oaks is well placed to accord with these requirements. For example, the masterplan includes:

- A diverse mix of uses that creates a largely self-sufficient village, which serves most day-to-day needs and reduces the need to travel
- Incorporates measures that draw upon evolving changes in travel and work patterns and habits that promote movement by sustainable means
- Provide three new vehicular access points that are designed to accord with current best practice guidelines
- Create a new sustainable transport corridor through the site that connects the A319 and the A320, thereby enhancing the permeability of the site for all modes, including public transport and the planned improvements to cycle facilities secured by the successful A320 HIF bid

Moreover, it has been established through reference to Census data for the local area that:

- 20% of current residents in the vicinity of the site currently travel less than 5km to work
- Approximately 16% of all journeys to work that originate from this area of Surrey Heath are to destinations that are served by the bus routes that currently pass the site (i.e. Routes 446 and 593)
- Approximately 10% of all commuting trips into this area of Surrey Heath originate from areas that are served by bus routes 446 and 593

This demonstrates that, with appropriate interventions the site will be able to provide future residents with attractive alternatives to the car for external journeys. The same also applies to future employees of the proposed commercial floorspace. Having regard to the above, the evolving masterplan places an emphasis upon sustainable modes of travel that enables less ‘car-centric’ movement patterns in favour of active travel modes (i.e. walking and cycling) together with public and on-demand responsive transport. The intention of this is to make provision for convenient, accessible and affordable travel to places of work, recreation and community services. At the heart of this strategy is the inclusion of a Mobility Hub that builds upon the evolving concept of Mobility as a Service (MaaS).

The promotion of alternative active modes of travel to ensure that people will be able to get the most out of their transport system is as important as providing the physical infrastructure and promoting active and healthier lifestyles. This will be achieved through a dedicated website, interactive ‘SmartphoneApp’, and conveniently located interactive information points. Through these mediums it will be possible to inform people about:

- Community events, entertainment and sporting activities and religious venues
- Important community meetings
- Local health centres, schools, and further education opportunities
- Job opportunities
- Local markets and lists of local traders and restaurants
- Transport pick up points and details about, dial-a-ride/demand responsive transport services

The STC will create a sustainable transport route between the A319 and the A320. Enhanced bus services through the site will provide connections to Woking station and St Peter’s Hospital, facilitated by the critical mass of new housing and employment proposed. Cycle links and footpath connections to the wider area will also be enhanced, to give safe and convenient alternatives to car travel for both commuting and recreational use.



20 Minute Neighbourhood

To be sustainable, the new neighbourhood will maximise opportunities to link and connect to existing villages, existing employment hubs and Woking railway station. The design of the new neighbourhood will embed all the qualities of a 20 Minute Neighbourhood, which are walkable, and compact, where residents are able to access services and facilities needed for daily life within a 20 minute round trip from home. The vision will promote:

- Walking and cycle friendly environment
- Pedestrian-priority around the community heart, within neighbourhoods and through the employment area
- Facilities for the daily needs of residents within walking and cycling distance, to support the ability to live locally
- Employment within close reach of residents
- Multiple and integrated sustainable mobility options
- Reduced need for outward journeys
- Healthier and more active lifestyle with easy access to local parks and the countryside
- Improved air quality and environmental quality
- Walking and cycle friendly environment
- Pedestrian-priority around the community heart, within neighbourhoods and through the employment area
- Facilities for the daily needs of residents within walking and cycling distance, to support the ability to live locally





A Flagship Sustainable Community

Creating memorable and vibrant places requires a mix of uses, offering a variety of interesting activities in a beautiful and distinctive setting. Drawing inspiration from nearby successful rural villages, the vision for Fair Oaks includes a primary school and local centre co-located to form a strong community heart in a 'village green' setting. This creates a destination at the eastern end of Runway Park. Adjacent to this community hub, Fair Oaks Common provides space for sports and allotments, serving as a gateway to Ottershaw Park to the west and the SANG.



A primary school will be established at the heart of the new neighbourhood. Its access to the surrounding landscape setting will open opportunities to integrate learning with nature, allowing children to experience education in an outdoor environment.



The Local Centre, strategically situated next to the primary school at the eastern end of Runway Park, offers picturesque views of the village green. The ground floor hosts a variety of community-oriented facilities that extend into the surrounding public spaces, fostering an active and vibrant environment. Above, residential units provide a seamless blend of living and community spaces, making this a lively mixed-use destination for all residents.



Easily accessible by cycle and foot, a destination adventure play area is located at the western end of Runway Park. This space provides an attractive green gateway into the site from Youngstroat Lane. Two additional play areas are situated on the edge of Bourne Meadows and within the woodland north of the community heart. Along with the sports, recreation, and allotments, the site will create an active environment that fosters health and wellbeing, offering a variety of activities for all abilities and age groups.

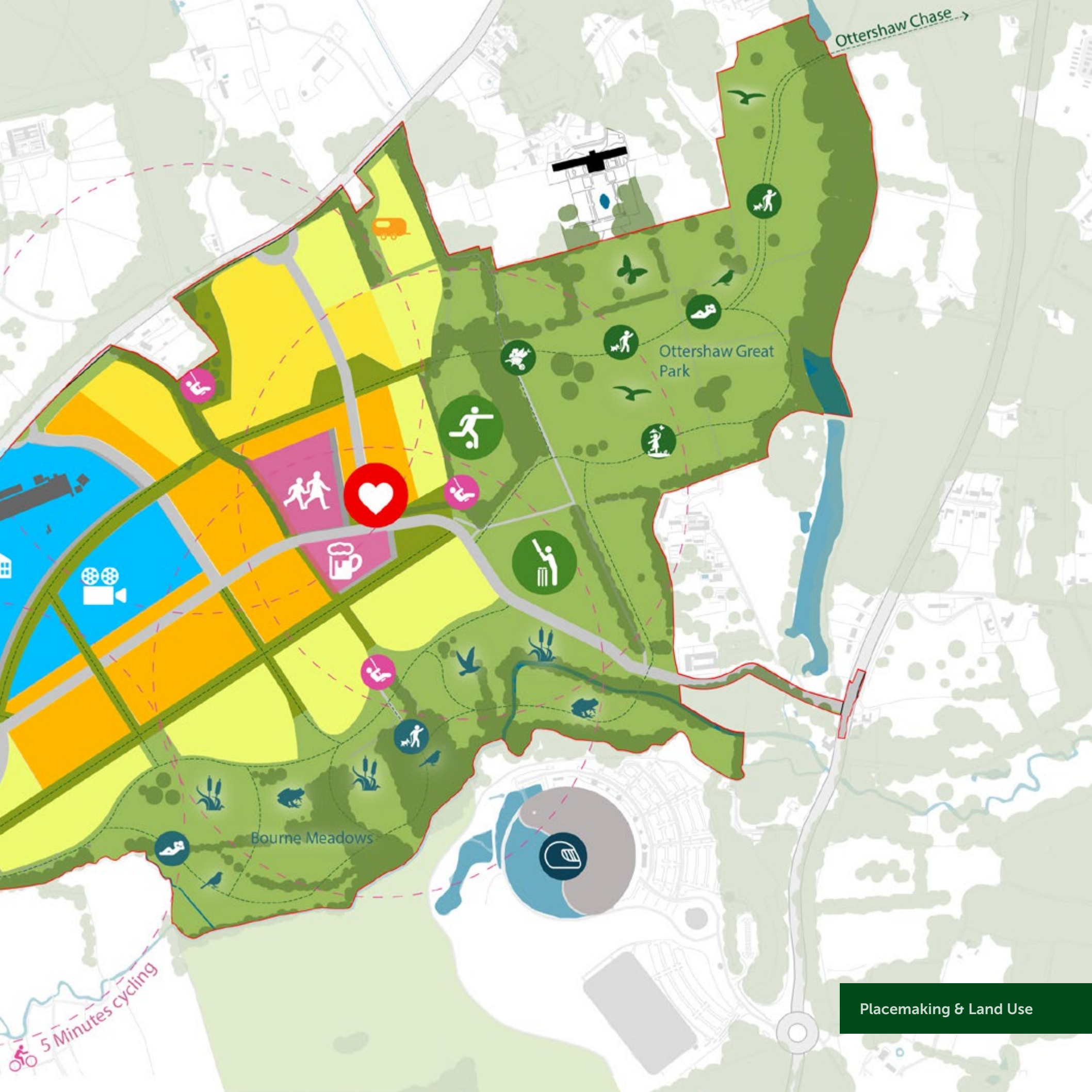


An employment hub within the site will complement the existing employment offerings, creating opportunities for start-ups, and maker spaces. Initial feasibility studies are also considering the accommodation of a film studio in this area.



The housing offer is key to creating a diverse and truly inclusive community. The new neighbourhood could deliver up to 1,600 homes, significantly contributing to the Borough's future housing needs. The neighbourhood will provide homes to meet the needs of a diverse community, offering a mix of housing types, sizes, and tenures to cater to different life stages.





Vistry: Creating Places People Love

Vistry Group was formed in 2020, and now combines the skills, commitment and values of Bovis Homes, Linden Homes and Countryside under one umbrella. This makes us the UK's leading mixed-tenure developer, capable of delivering sustainable homes and communities across the UK.

We believe that where we live matters. We are passionate about creating places where people aspire to live and where they feel a true sense of belonging. Our creative approach to place making ensures a positive impact on all those who live in and around our developments. Vistry Group (formerly Countryside Strategic Land and Major Projects), has earned a reputation for high quality, innovative landscape-led design, where considerate development has created award-winning developments.



Great Kneighton



Creating Sustainable Communities



Beaulieu

Delivering Vibrant Communities & Mixed-Use Facilities



Wickhurst Green



Kingsmere



Beaulieu Square



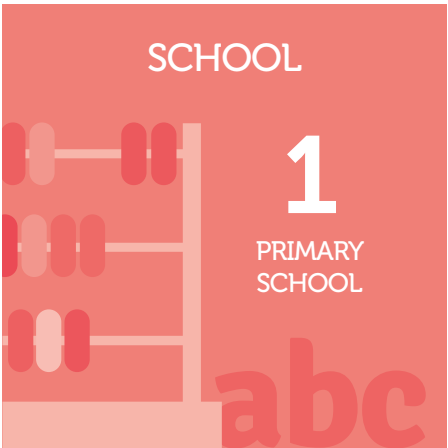
Clay Farm Centre, Great Kneighton

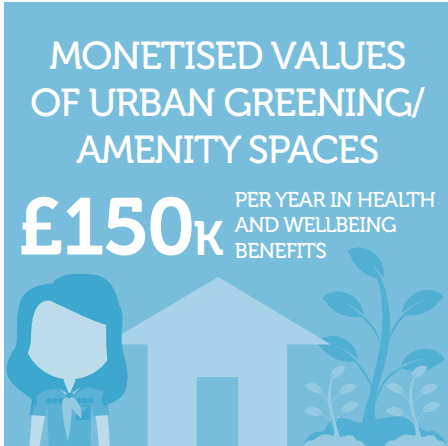
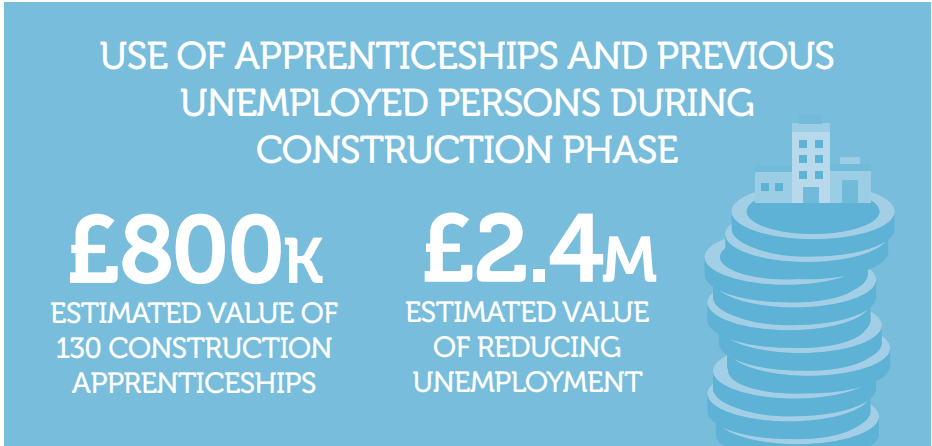
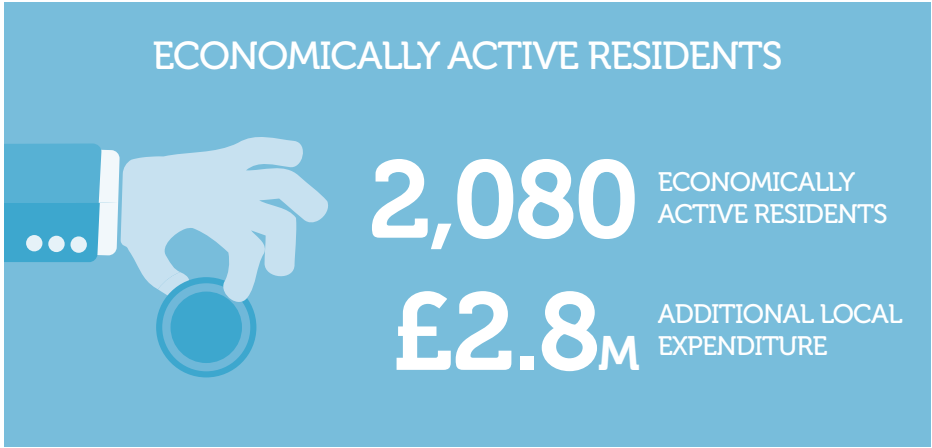
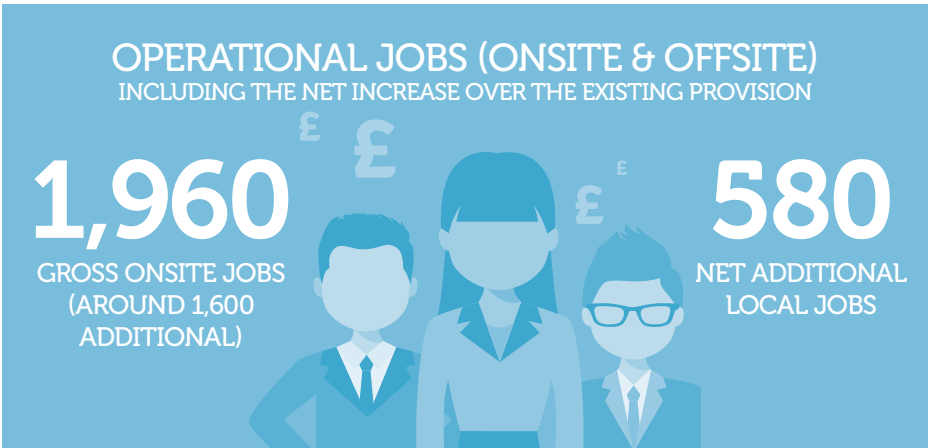
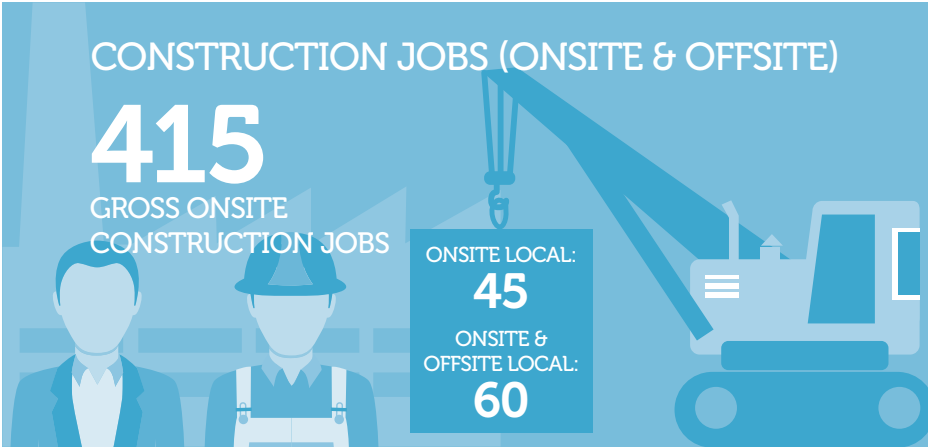
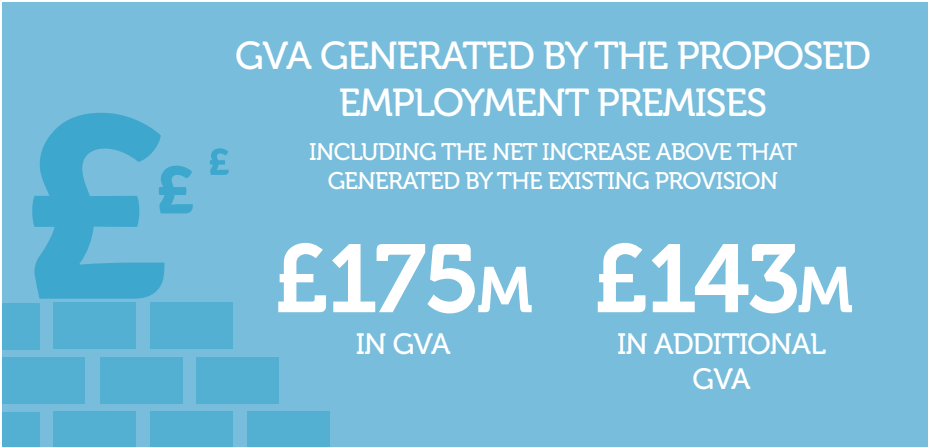


Safeguarding &
Enhancing Biodiversity

Summary of Key Benefits: Scenario A

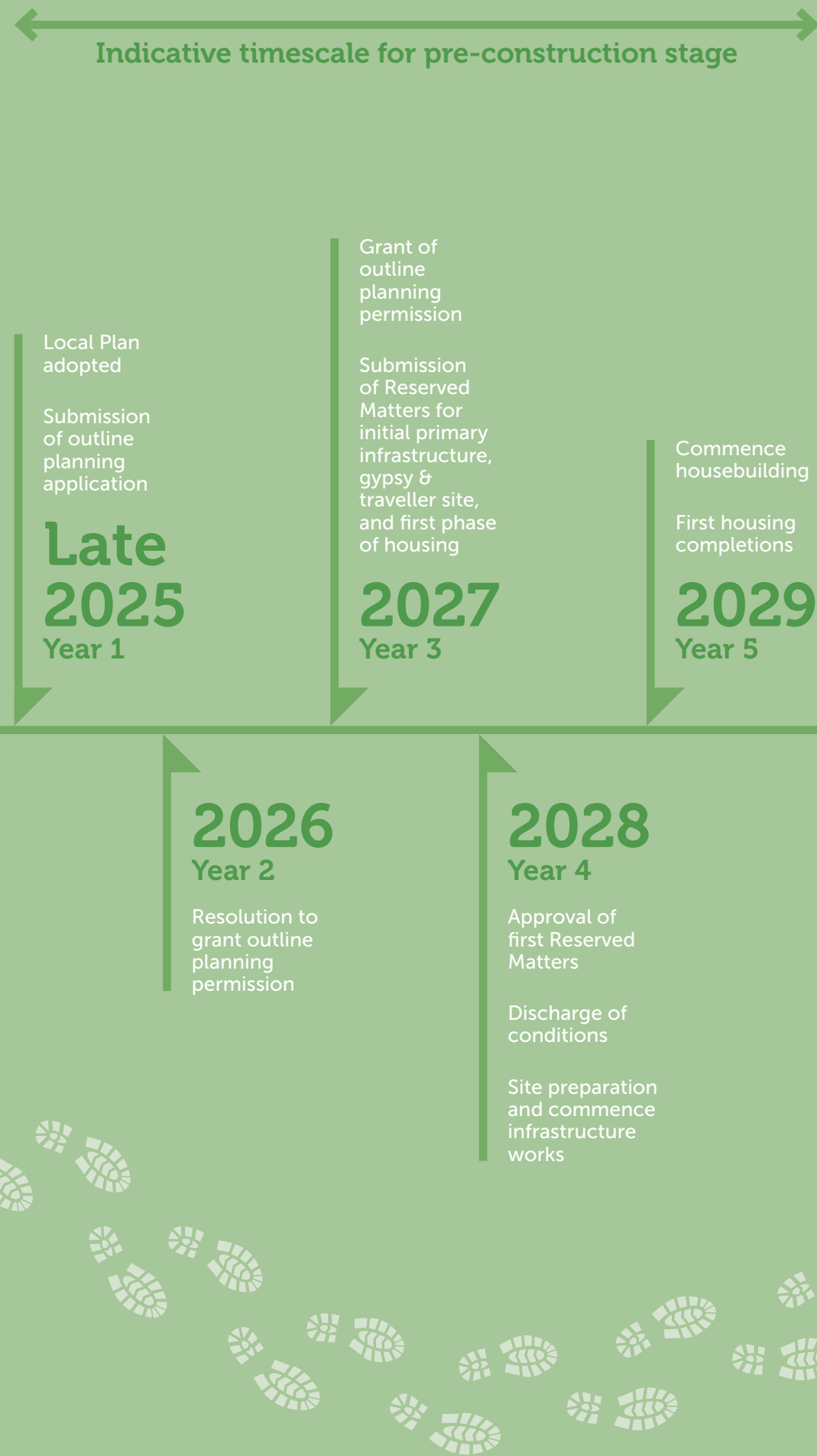
Savills Economics have undertaken an initial assessment of the economic benefits and social value associated with the potential redevelopment of Fair Oaks Airfield. Our assessment has investigated two scenarios, one with studios and one without. Under each scenario for Option A, development would generate economic benefits by providing direct and indirect job opportunities. These include temporary jobs created during the construction period as well as permanent jobs generated by new and refurbished employment spaces and once new residents move in. We have also estimated GVA, new local residential expenditure and public sector revenues likely to be generated by each scenario. In addition, we have estimated the potential social value that is likely to be generated by the scenarios. Social Value includes the additional social, health and wellbeing benefits that could be secured over and above core requirements.

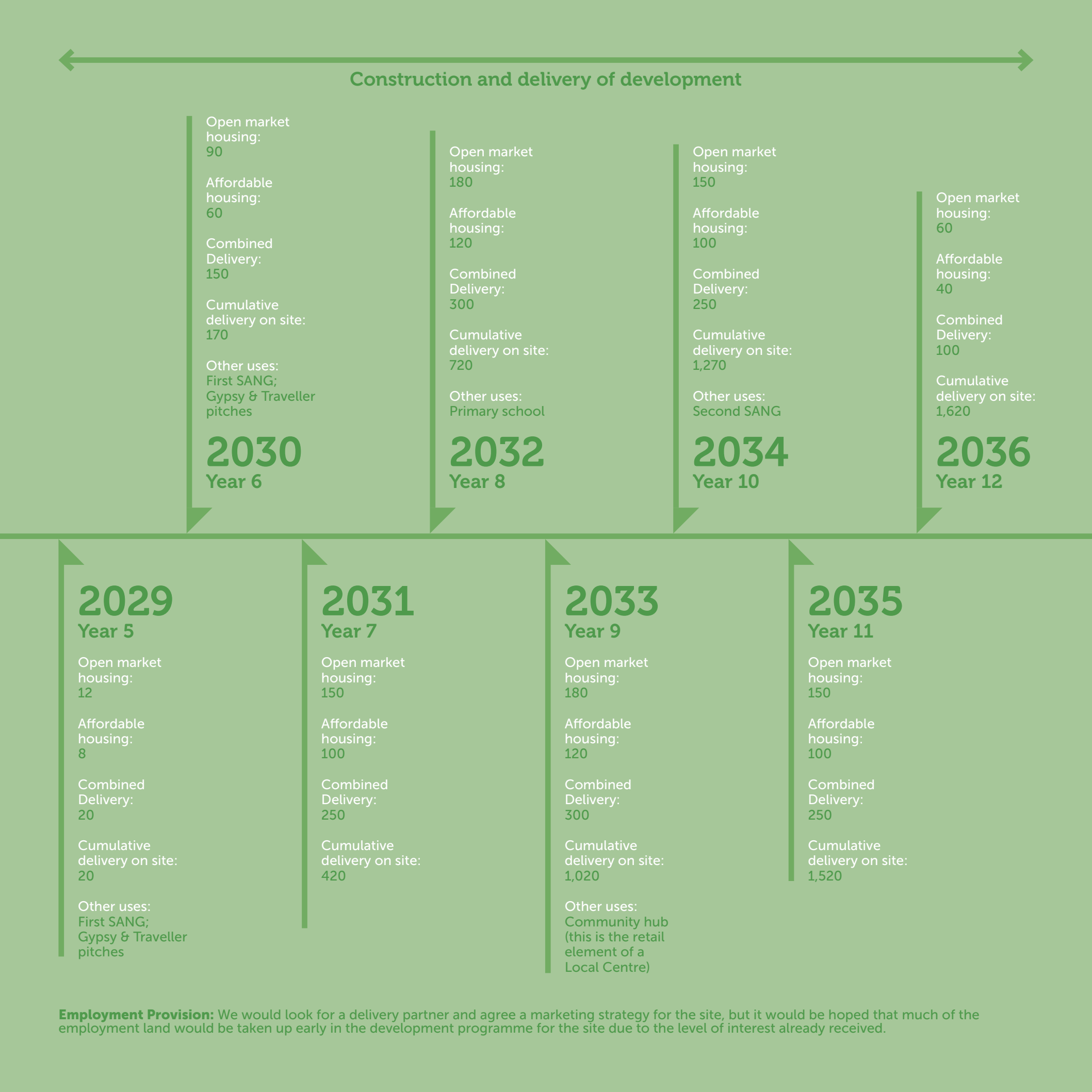




Why Fair Oaks?

- Much of the site is Previously Developed Land (PDL) and Grey belt. Limited visual impact/does not prejudice the landscape or purposes of the Green Belt
- Exceptional circumstances exist
- Help Surrey Heath Borough Council (SHBC) meet a shortfall in homes, jobs, Gypsy and Traveller pitches (G&T) and deliver much needed additional SANG
- A ready made employment site which adds to an existing commercial site that is popular. There has been much interest from commercial operators and promoters over recent years e.g. Film Studios and logistics and is seen by them as a great location near the M25 etc.
- Deliverable at pace, using Vistry's accelerated delivery model.
- Much needed Affordable Housing (AH) to meet an acute need in SHBC. Provision fits with the Vistry Partnership approach, and we would seek a Registered Provider (RP) partner(s) early in the planning process to co-ordinate the early delivery of AH on the site. This to be a range of tenures and types including Build-to-Rent.
- Provision of a significant area of multi-use open space which will not only serve the needs of new residents and employees on the site but serve a much wider needs of residents in (Woking and Runnymede Borough Council), including significant SANG (walking routes), Biodiversity Net Gain (BNG), recreation.
- Vistry, being the Master Developer and provider of strategic infrastructure, have the experience/skill sets/consultancy team to deliver a co-ordinated, well designed sustainable walkable neighbourhood, set within an enhanced landscape setting creating a place that people will love to live and work in, and visit.







Vistry Group



Appendix 4 - Green Belt Exceptional Circumstances

In Surrey Heath Borough Council

On behalf of Vistry Group

Appendix 4 - Green Belt Exceptional Circumstances

On behalf of Vistry Group



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Appendix 4 - Green Belt Exceptional Circumstances

On behalf of Vistry Group



1. Executive Summary

- 1.1. This report provides an update to the previous Green Belt Exceptional Circumstances Report dated May 2022, prepared as part of the representations to the Surrey Heath Regulation 18 Local Plan. Surrey Heath Borough Council's ('SHBC') Green Belt has remained unchanged since 1987. Three successive plans have all maintained its boundaries. National planning policy permits a review of Green Belt boundaries, ensuring these are fit for purpose.
- 1.2. Vistry has an excellent track record of delivering sustainable settlements across the south-east. Notably in order to make the efficient use of previously developed land, plus improve the sustainability credentials of 'Land at Fairoaks' (herein after referred to as 'the Site' or 'Land at Fairoaks'), Vistry is seeking to deliver 1,600 dwellings, that provides substantial community infrastructure and employment.
- 1.3. The report evidences that in the context of geographical constraints, severe affordability issues, and housing need, Exceptional Circumstances exist within the SHBC administrative area to revise the Green Belt boundary through the emerging Local Plan process. This review must ensure that the revised boundaries endure beyond the emerging plan period.
- 1.4. These factors must be considered alongside opportunities to make suitable use of previously developed land within the Green Belt which have limited contribution to its purposes. This aspect is even more important with the Government's proposals for 'Grey Belt' within the consultation NPPF. The Site has the potential to create a sustainable community with substantial benefits. This evaluation benefits from detailed information available to evaluate Fairoaks as a development site, since a planning application was submitted on the site in 2018, and therefore has been the subject of detailed assessment from consultees demonstrating its deliverability. It is to be read alongside Representations made to SHBC's Regulation 19 consultation on behalf of Vistry.
- 1.5. It is acknowledged that there is no formal definition to demonstrate Exceptional Circumstances, albeit the NPPF 2023 does refer to three criteria which must be met which enables the Local Planning Authority (LPA) to ensure other reasonable options have been considered to meet its identified need for development before Exceptional Circumstances exist. These are considered in this report. Since the publication of the last Exceptional Circumstances Report, SHBC have prepared a Green Belt Exceptional Circumstances Topic Paper (August 2024). SHBC have released some land from the Green Belt for Gypsy and Traveller needs, insetting Chobham Village and Longcross Garden Village. This demonstrates that SHBC consider Exceptional Circumstances do exist overall in Surrey Heath.
- 1.6. As presented within this report, Vistry's view is that Exceptional Circumstances exist at Fairoaks.

2. Introduction

- 2.1. This report is prepared on behalf of Vistry Group ('Vistry') as evidence of Exceptional Circumstances within the administrative authority area of SHBC. It is produced as an Appendix to the SHBC Regulation 19 Local Plan representations.
- 2.2. SHBC consider that currently no exceptional circumstances exist to warrant the release of Fairoaks from the Green Belt to accommodate new homes. Vistry fundamentally disagree with this, as evidenced throughout this report. The opportunity for Green Belt release, and sequential approach which addresses significant available previously developed land in the Green Belt, as a reasonable alternative, should form part of this consultation process.
- 2.3. The Vistry proposal will deliver circa 1,600 dwellings (preferred scenario) at Land at Fairoaks ('the site'), which makes more efficient use of the previously developed site. The Framework Plan (Appendix 2d of the representation) will address the relevant Garden Village criteria and include gypsy and traveller pitch provision (up to 12 pitches). Notably, there are two other scenarios – Scenario B (Housing Led proposal) and Scenario C (Grey Belt proposal), these could provide 1,800 dwellings and 1,000 dwellings respectively. The reason for having two alternative scenarios is that both provide different opportunities for SHBC, Scenario B, along with other allocations, would allow SHBC to not have to review their Local Plan immediately (based on consultation NPPF requirements) and Scenario C is based on the 'grey belt' definition and is the figure tested within Option B of the Sustainability Appraisal (SA). Further reasoning and information is provided within the representations themselves.
- 2.4. SHBC is looking to amend its plan period to 2038, starting in 2019. As set out within our representations, Vistry consider that 2019 is too early given the Local Plan is unlikely to be adopted until 2025 at the earliest. Further submissions are made in this regard within the detailed representations.
- 2.5. SHBC published a draft Strategic Land Availability Assessment (SLAA) in December 2019. The SLAA looks at the land supply situation in SHBC from 2019, for fifteen years. A subsequent version of the SLAA was produced in 2021 and 2023.
- 2.6. Savills' view is that there is now (and will continue to be) a shortfall in housing supply against SHBC's Local Housing Need (LHN) over the updated plan period. Further details of this can be viewed in Section 4 of the representations. A large proportion of sites (59%) already benefit from planning permission.
- 2.7. In addition, there is a significant need for affordable housing in the Borough and its adjoining authorities including HDC. Fairoaks will seek to deliver a level of affordable housing of at least 40%, which should be up to 640 affordable homes (nearly two times the number that has been delivered within SHBC over the last 6 years).
- 2.8. NPPF (paragraph 146) identifies a list of criteria for LPAs to demonstrate it "*has examined fully all other reasonable options for meeting its identified need for development*", these being:
 - a) "*Makes as much use as possible of suitable brownfield sites and underutilised land;*

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- b) *Optimises the density of development in line with the policies in Chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) *Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground".*

2.9. Notably in relation to point a), the built form is proposed mainly on the brownfield element of the Site, which contains the buildings, airstrip, tarmac and managed mown grassland surrounding the runways which supports the functioning and operational activities of the airfield and runway. This equates to 49 hectares. This is consistent with the approach taken in the case of Dunsfold Aerodrome (Appeal ref: PP/R3650/V/17/3171287 (paragraphs 320 to 322), where the Inspector confirmed that 83% of the Dunsfold was previously developed [emphasis added]:

*"The grassed areas in between the runways are functionally related to them. They provide safe run off areas for aircraft and a means of direct access to them for emergency vehicles. They are managed so as to maintain the necessary visibility for aircrew, air traffic controllers and emergency staff. They include a grass runway for aircraft that cannot land on concrete. These areas are all ancillary to and essential to the established use of the site. **In short, the operational part of the aerodrome, including the runways and interstitial grassed areas, is developed land**".*

2.10. The NPPF places an emphasis on planning policies promoting an effective use of land in meeting the need for homes and other uses.

2.11. In relation to point b) in paragraph 2.7 above, SHBC has produced an updated Strategic Land Availability Assessment (SLAA). The SLAA demonstrates towards the end of the plan period, from 2031, that SHBC risks shortfalls in its 5-year housing land supply.

2.12. A key matter to consider is delivery, and ensuring a balanced mix of housing and employment sites. In nearby Guildford Borough (GBC), the Local Plan has been adopted with a significant buffer over the baseline housing requirement, in order to make the best use of land, development opportunities and associated infrastructure delivery. The Exceptional Circumstances to justify the required Green Belt releases stood scrutiny at Examination and subsequently in the High Court ('the Compton Case').

2.13. In December 2019, the High Court issued its Judgment dismissing the challenge to the GBC Local Plan (Compton Parish Council & Ors v Guildford Borough Council & Anor [2019] EWHC 3242 (Admin). The decision found that general planning needs is not precluded from its scope of Exceptional Circumstances and a pressing and acute housing need does not need to be shown (GBC provided for 4,000 additional dwellings above its objectively assessed housing need). In addition, the Judgment found that:

- Exceptional Circumstances is a less stringent test than the test applied to planning applications which requires 'Very Special Circumstances' (consistent with previous Case Law);
- There is no last resort test when releasing Green Belt;
- Whether Exceptional Circumstances have been demonstrated is a matter primarily for the decision-maker;
- Exceptional Circumstances can be found in the accumulation of circumstances, not each of which has to itself be exceptional;

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- The emphasis is very much on assessing the rationality of the judgement rather than providing a definition of criteria. The list set in Calverton (previous Case Law) is not a checklist.

- 2.14. In addition to market housing, the proposal should provide up to 640 affordable housings, plus up to 12 pitches for Gypsy and Travellers, for which there is a significant shortfall in SHBC. The Gypsy and Traveller Accommodation Assessment (GTAA) (2020) identifies an overall need for 35 pitches by 2040. The provision of both affordable housing and Gypsy and Traveller pitches provides for further Exceptional Circumstances in relation to the Site. Notably, SHBC in their Green Belt Exceptional Circumstances Topic Paper note that Exceptional Circumstances exist for the extension to Swift Lane Gypsy and Traveller Site.
- 2.15. Finally, in regard to point c) whilst HDC has adopted their Local Plan that provides for 41 dpa to help meet SHBC's housing needs, Savills' view as set out in paragraph 2.11 above is that there continues to be an unmet need given the two different plan periods. There may well be further unmet needs from Woking, an adjacent Authority, very well related to Fairoaks. Woking has historically failed to meet its housing requirement, and in the past has sought to export these unmet needs to Guildford and Waverley, but on the basis of the NPPF (2023) it is not certain that an approach based on former Housing Market Areas will remain sound. Significantly all of these authorities will see an increase to their housing need under the proposed method figure.

Table 2.1 – Differences between current and proposed housing needs figures

District	Current Figure	Proposed Figure	% Change	Potential increase over 15yr plan period
Surrey Heath	320	658	+338	5,070 dwellings
Hart	297	734	+437	6,555 dwellings
Rushmoor	265	606	+341	5,115 dwellings
Woking	436	795	+359	5,385 dwellings
Runnymede	546	620	+74	1,110 dwellings

- 2.16. Given that Hart's Local Plan will be five years old in 2025, and the potential increase in Hart's housing need from 297 dwellings per annum (dpa) to 734dpa any Local Plan Review is unlikely to accommodate SHBC's unmet need.

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2.17. NPPF paragraph 144 states that:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

2.18. Unlike paragraph 146, this paragraph does not provide guidance on the test for Exceptional Circumstances, in terms of sequentially preferable sites, given the first reference is to sites inside the Green Belt boundary. Rather it provides guidance on sustainable patterns of development. In relation to this, it does note that where Exceptional Circumstances exist (i.e. it is necessary to release Green Belt land for development), the focus should be on previously developed land and/or sites well-served by public transport. As identified above Exceptional Circumstances exist, therefore Land at Fairoaks being a largely previously developed site with notable sustainable modes of transport proposed meets this requirement

2.19. In addition, should SHBC release part of the Site from the Green Belt (to accommodate the built form elements of the proposal), Land at Fairoaks will provide the necessary compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land as identified in paragraph 142 of the NPPF.

2.20. This will be ensured through the provision of a circa. 53 hectare country park accessible to existing and future residents with over 5 miles of walking, cycling and horse riding routes. This park creates connectivity between the proposed Suitable Alternative Natural Greenspace (SANG) and existing green infrastructure in the surrounding area including Heather Farm SANG, McLaren Park and Ottershaw Chase SANG. In addition, 14 hectares of SANG is proposed for lowland heath restoration, which is a priority habitat in the Surrey Biodiversity Action Plan and Section 41 of the NERC Act 2006. The provision of the new heathland will act as a ‘stepping stone’ between component SSSIs of the Thames Basin Heaths SPA and will ensure that the project delivers a landscape-scale ecological benefit, improving the connectivity and resilience of the ecological network between the remaining heathland areas that compromise the SPA.

2.21. Given the above, Exceptional Circumstances to trigger a review of the Green Belt must be considered. Suitable amendments to Green Belt land are appropriate based on Paragraphs 144 to 147 of the NPPF 2023. Notably, the current consultation NPPF 2024, provides greater opportunities for Green Belt sites with limited contribution to the Green Belt (i.e. Grey Belt), however for the purposes of this report, it is assumed that SHBC will seek to submit their Local Plan to the Planning Inspectorate ahead of the 2024 NPPF being policy. As identified above, there are Exceptional Circumstances in either case.

2.22. This report evaluates the NPPF’s Exceptional Circumstances conditions and provides affirmation that they are met within SHBC. This is based on SHBC-wide considerations such as geographical constraints and housing need, alongside site specific considerations such as opportunities to maximise previously developed land in the Green Belt and the benefits of development.

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2.23. The Exceptional Circumstances within SHBC consist of:

- **Local Authority Wide Considerations:**

- The heavily constrained nature of the Borough (74% affected by Green Belt or environmental constraint, with the remaining areas mostly already built up to boundaries);
- Housing need - to provide land to achieve and meet identified development needs and to ensure a balanced mix of homes achieved through a range of sites including for gypsy and travellers;
- Inability of other nearby local authorities to assist with meeting all of SHBC's unmet housing needs;
- Employment need – opportunity to provide additional jobs, close to existing settlements (Woking / Ottershaw);
- The unavailability of suitable brownfield sites and underutilised land within settlement boundaries (on the basis of SHBC's own evidence).

- **Site Specific Considerations relating to Land at Fairoaks:**

- 49 hectares of previously developed land;
- Compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land;
- Limited contribution to Green Belt Purposes;
- Opportunity for Sustainable Development/to be well served by public transport
- Opportunity for flood risk and river quality improvements.

2.24. Development at Fairoaks would make best use of previously developed land within the Green Belt without undermining the permanency of the Green Belt in the long-term. Furthermore, Land at Fairoaks could potentially allow SHBC to meet its full shortfall of homes with some much needed flexibility. As a sustainable new community it would conform with the NPPF while providing confidence that the site is deliverable, when considering the previous planning application (ref. 18/0642).

2.25. Savills' view is that SHBC should review all suitable, available and deliverable sites (such as Fairoaks) before relying on this 41dpa from HDC, particularly given the proposed housing need figure for HDC as set out in paragraph 2.16 above. As identified above, the HDC plan period is different to that proposed by SHBC and therefore there will be unmet need from this aspect alone. Notably SHBC are including 4/5 years within the plan period ahead of adoption, plus 59% of the dwellings already have planning permission.

2.26. This report considers the following:

- Sections 3 and 4 consider Planning Policy and Case Law respectively, reviewing the most recent guidance in relation to Green Belt and demonstrating Exceptional Circumstances;
- Section 5 considers Inspector's Rulings and provides examples where sites have been removed from the Green Belt ahead of other non-Green Belt sites;
- Section 6 identifies the Exceptional Circumstances that exist within SHBC, and provides further detail based on the overview provided above; and
- Section 7 contains the conclusion.

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3. Planning Policy

3.1. The relevant paragraphs of the NPPF which guide an evaluation of Exceptional Circumstances are as below [emphasis added].

- “145. Once established, there is no requirement for **Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where Exceptional Circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.** Strategic policies should establish the need for any changes to Green Belt boundaries, **having regard to their intended permanence in the long term, so they can endure beyond the plan period.** Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.
- 146. Before concluding that Exceptional Circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to **demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.** This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:
 - a) **makes as much use as possible of suitable brownfield sites and underutilised land;**
 - b) **optimises the density of development** in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and;
 - c) **has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.**
- 147. When drawing up or reviewing Green Belt boundaries, the **need to promote sustainable patterns of development** should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give **first consideration to land which has been previously-developed and/or is well-served by public transport.** They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

3.2. As above, Exceptional Circumstances must be fully evidenced and justified via the Local Plan process. The narrative in section 6 of this report clearly outlines that if a), b) and c) have been carried out and development needs still cannot be met, Exceptional Circumstances exist.

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- 3.3. It is acknowledged that through the 2023 NPPF, there is not a requirement to review Green Belt, however SHBC have decided to do this to help meet development needs. It is important to consider the 2024 consultation NPPF which identifies that authorities should review Green Belt boundaries. Notably in the recent Elmbridge Borough Council Examination, the Inspector considered that Elmbridge should consider its strategy regarding Green Belt to consider whether there are opportunities for Green Belt release, as the Plan drafted without any Green Belt sites was unsound.
- 3.4. Policies altering the Green Belt must have '*regard to their intended permanence in the long term, so that they can endure beyond the plan period*'. Therefore, a long-term strategy should comprehensively address housing need beyond 2038; the stage the Council is at now is the most appropriate plan-making stage to address Exceptional Circumstances, rather than during revisions of the plan as required at least every 5 years.
- 3.5. Within the NPPF as updated in July 2023 there is also a requirement at paragraph 22 for policies for larger scale developments such as new settlements or significant extensions to existing villages and towns to be set within a vision that looks at least 30 years ahead. In this case, the message is consistent with the NPPF's requirement for Green Belt alterations to have regard to their permanence in the long term.
- 3.6. The Local Plan must first make best possible use of brownfield and underutilised land, density, and cooperation with neighbouring authorities.
- 3.7. On revising Green Belt boundaries, priority should first be given to land which has been previously-developed and/or is well served by public transport and the need for sustainable development should be taken into account.
- 3.8. Offsetting Green Belt removal through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land is an additional consideration for Green Belt sites. The Planning Policy Guidance (PPG) provides details of these compensatory improvements and identifies which can include: new and enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity, habitat connectivity and natural capital, new or enhanced walking and cycle routes and improved access to new, enhanced or existing recreational and playing field provision (Ref ID: 64-002020190722). Paragraph 3 of the PPG lists how these improvements can be secured, identifying the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy (CIL). Notably the proposals on Land at Fairoaks provides these compensatory improvements, as identified above and in section 6 below.
- 3.9. As acknowledged within this report, there is no formal definition to demonstrate Exceptional Circumstances, albeit the inclusion to paragraph 141 sets out the criteria that must be considered at any Local Plan Examination ahead of Exceptional Circumstances being demonstrated. Notably, there has been an increasing amount of case law, and examples of local planning authorities altering the boundaries of their Green Belt through their Local Plans. This is outlined in this report.

4. Case Law

4.1. SHBC outlines a variety of relevant case law within its Green Belt Exceptional Circumstances Topic Paper 2023 (Paragraphs 2.24-2.34). Without unnecessary repetition, these are summarised as:

- **Gallagher Homes Limited v Solihull Metropolitan Borough Council established that;**
 - Planning guidance is a material consideration for plan-making and decision-taking which does not have statutory force.
 - Local Plan preparation does not itself justify boundary change via Exceptional Circumstances.
 - Exceptional circumstances are required for Green Belt revision.
 - Each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgement.
 - What is capable of amounting to Exceptional Circumstances is a matter of law.
- **Hundal v South Buckinghamshire District Council, Grand Union Investments Ltd v Dacorum BC and Calverton Parish Council v Nottingham City Council all clarify;**
 - Housing need can be capable of justifying a change to Green Belt boundaries. However, in each instance it is clear that it is not housing need alone, but the wider spatial requirements of an authorities' area through which an exceptional case can be established.
- **Calverton Parish Council v Nottingham City Council further established that;**
 - Exceptional circumstances may be identified through appropriate consideration of both the acuteness/intensity of housing need and the inherent constraints on supply/availability of land suitable for sustainable development in addition to the consequent difficulties in achieving sustainable development without impinging on the Green Belt, the nature and extent of the harm to this Green Belt and the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

4.2. Alongside the above, the below cases must also be considered:

- **IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin) held that;**
 - For revisions to the Green Belt to be made Exceptional Circumstances have to be demonstrated, and whether they have been is a matter of planning judgment in a Local Plan exercise ultimately for the Inspector.

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- **Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin) held that factors to ascertain whether Exceptional Circumstances exist include;**
 - The acuteness/intensity of the objectively assessed need (matters of degree may be important).
 - The inherent constraints on supply/availability of land prima facie suitable for sustainable development;
 - (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
 - The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
 - The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.
- **The most important recent decision in terms of determining the test of whether Exceptional Circumstances exist was the Judgment dismissing the challenge to the Guildford Borough Council Local Plan in Compton Parish Council & Ors v Guildford Borough Council & Anor [2019] EWHC 3242 (Admin) which found that:**
 - Exceptional Circumstances is a less stringent test than required for Very Special Circumstances;
 - There is no last resort when releasing Green Belt;
 - Whether Exceptional Circumstances exist is a matter primarily for the decision-maker;
 - General planning needs is not precluded from its scope, and a pressing and acute need does not need to be shown (as an example GBC provided for 4,000 additional homes above its objectively assessed need);
 - Exceptional Circumstances can be found in the accumulation of circumstances, not each of which has to itself be exceptional;
 - The emphasis is very much more on assessing the rationality of the judgement rather than providing a definition of criteria. The list set in Calverton is not a checklist.

4.3. For completeness it is noted that the Aireborough Judgement (Aireborough Neighbourhood Development Forum v Leeds City Council & Ors [2020] EWHC 1461) was issued more recently, whereby, amongst other matters, the Inspector examining the Local Plan was found to have made an error in law as to whether Exceptional Circumstances exist when the housing numbers had substantially decreased. However, Mrs Justice Lieven made it clear in paragraph 106 of the Judgment that the challenge was based on failure of the Inspector to give adequate reasons rather than the case on whether Exceptional Circumstances exist given the oversupply of housing in the Leeds City Local Plan.

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- 4.4. It is also relevant that paragraph 135 of the Aireborough Judgement states that “.....it is overly simplistic to assume that releasing GB sites before other sites is necessarily contrary to the achievement of sustainability objectives”. Hence, as in Compton, Green Belt sites are not to be considered as a ‘last resort’ if they achieve sustainable development.
- 4.5. As identified in Section 3, the 2023 NPPF provides criteria for ensuring LPAs have examined a number of options before concluding Exceptional Circumstances exist. However, the Calverton Judgment continues to provide the most detailed consideration in establishing the test for Exceptional Circumstances, albeit as recognised in Compton whether Exceptional Circumstances exist is a judgement rather than a definitive list.

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5. Inspectors' Report Rulings

- 5.1. There have been a number of Local Plans found sound at Examination which proposed the alteration of Green Belt boundaries, including authorities similar to Surrey Heath, that do not have district wide Green Belt constraints, like Waverley and Guildford in Surrey.
- 5.2. Data published by the Ministry of Housing, Communities and Local Government on 28 September 2021 demonstrates that in 2020 to 2021, a total of 11 LPAs adopted new plans which made changes to Green Belt boundaries. Table 5.1 below tracks this over the past seven years and shows an increase in the number of LPAs adopting Local Plans found sound at examination with amendments to Green Belt boundaries:

Table 5.1: MHCLG's Local Authority Green Belt: England 2019-20 report dated 10 September 2020

National summary of net changes to land designated as Green Belt								
Year	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-2021
Number of local authorities changing their Green Belt boundary	3	11	8	8	10	13	15	11
Total net change (hectares)	-5,770	-1,890	-1,030	-1,180	-6,110	-3,860	-3,520	-1,760

- 5.3. Owing to the availability of land alongside a number of other factors discussed in this Report, Local Authorities are increasingly having to positively grapple the issue, for example in:
- Birmingham City Council (Birmingham Development Plan 2031), Inspector's Report – March 2016;
 - City of Bradford Metropolitan District Council Core Strategy Inspector's Report – August 2016;
 - Vale of White Horse, Local Plan Part 1, Inspector's Report - November 2016;
 - Gloucester City Council, Cheltenham Borough Council, and Tewkesbury Borough Council, Joint Core Strategy, Inspector's Report – October 2017;
 - London Borough of Redbridge, Local Plan 2015-2030, Inspector's Report - January 2018;
 - Waverley Borough Council, Local Plan Part 1, Inspector's Report – February 2018;
 - Wyre Council, Local Plan 2011-2031, Inspector's Report – February 2019;
 - Guildford Borough Council Local Plan: strategy and sites (2015 - 2034), Inspector's Report – March 2019;
 - Broxtowe Borough Council, Part 2 Local Plan, Inspector's Report – October 2019;
 - Bolsover District Council, Local Plan for Bolsover District, Inspector's Report – January 2020;

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- Runnymede Borough Council, Runnymede 2030 Local Plan, Inspector's Report – May 2020;
- Cherwell District Council, Cherwell Local Plan 2011-2031 (Part 1) Partial Review, Inspector's Report – August 2020;
- South Oxfordshire District Council, South Oxfordshire Local Plan, Inspector's Report – November 2020;
- Welwyn Hatfield Borough Council, Welwyn Hatfield Local Plan, Inspector's Letter – June 2021; and
- Woking Borough Council, Site Allocations DPD, Inspector's Report – August 2021;

5.4. The key Exceptional Circumstances identified in the various Inspectors' Reports can be summarised as:

- **Local Authority Wide Considerations:**
 - Inability for Unmet Need to be accommodated elsewhere in the Borough;
 - Alternative Sites – Brownfield;
 - Alternative Deliverable Sites – Greenfield Non Green Belt;
 - Overall Scale of Under-provision if only non-Green Belt Land utilised;
 - Other Landscape Constraints e.g. AONB;
 - Recent Under-delivery of Housing including Gypsy and Traveller sites; Employment need.
- **Site Specific Considerations:**
 - Quantum of Brownfield Land;
 - Contribution to Green Belt Purposes;
 - Character of Site;
 - Location of the Site;
 - Sustainable Development;
 - Defensible Boundary;
 - Benefits of development.

5.5. These are further detailed below.

Birmingham City Council – March 2016

- The Inspector's Report states:
 - Para 214; "In my view, preserving their Green Belt status is not essential in order to encourage the recycling of derelict and other urban land, given the clear evidence of a shortage of land to meet Birmingham's overall development needs. The decision to release these two defined areas of land for development will not lead to "unrestricted sprawl", and both **have defensible boundaries formed by main roads and topographical features.**"

City of Bradford Metropolitan District Council (CBMDC)– August 2016

- The Inspector's Report states:
 - Para 42; "CBMDC has identified the Exceptional Circumstances needed to justify the release of Green Belt land, **in order to fully meet the development needs for housing and to support the regeneration and long-term economic success of the district.**"

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- Para 43; “Further evidence in the Growth Study [EB/037] confirms that land is available in the Green Belt in sustainable locations without undermining the functions and purpose of the Green Belt. Similarly, the **Employment Land Review (ELR) [EB/027] confirms that a significant proportion of new employment land will have to be accommodated within Green Belt areas, to ensure a suitable offer of deliverable large sites in good market locations, given the current supply and quality of employment land in non-Green Belt areas.**”

Vale of White Horse, Local Plan Part 1 – November 2016

- The Full Inspector’s Report states:
 - Para 87; “I recognise that the Green Belt around Abingdon, Kennington and Radley is much valued by many people and the **alteration of its boundaries would not be entirely without harm.** However, the Council’s proposal to remove from the Green Belt housing sites 1,2 3 and 4, enabling some 1500 or so dwellings to be built, **would have only limited impacts on the function of the Green Belt, primarily being localised encroachment of the countryside.**”

Gloucester City Council, Cheltenham Borough Council, and Tewkesbury Borough Council, Joint Core Strategy – October 2017

- The **Final** Inspector’s Report states:
 - Para 163; “...taking full account of constraints and the outcomes of cross border exploration, removal of land from the GB is needed, so far as is justified, to contribute to housing provision and the five year supply. In coming to this conclusion, I have considered paragraph 14 of the NPPF. For the GB releases identified below, I find that **the adverse impacts of removing land from the GB would not significantly and demonstrably outweigh the benefits of contributing towards housing and other development needs**”.
 - Para 171; “...which seek the **endurance of reviewed GB boundaries for the long term beyond the Plan period**, and, where necessary, the identification of safeguarded land to meet future development needs.”

London Borough of Redbridge, Local Plan 2015-2030 – January 2018

- The Inspector’s Report states:
 - Para 43; “**...without Green Belt sites the relevant housing requirement would not be met contrary to the aims of the NPPF...**”
 - Para 46; “There are two further factors that support the release of Green Belt sites. The first is that the **recent record of housing delivery in Redbridge has been poor.**”
 - Para 72; “All 4 of these sites [proposed site allocations] have some Green Belt value...**But just because a site contributes in some way to Green Belt purposes does not mean it cannot be released.** Indeed, there are other factors to put into the equation.”
 - Para 75; “...So these 3 sites do not have the highest credentials in terms of an accessible location but neither are they places where new housing would be unacceptable.”

Appendix 4 - Green Belt Exceptional Circumstances

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- Para 87; “The Council is satisfied that the Green Belt boundaries will not need to be altered at the end of the development plan period. Furthermore, the **new boundaries have been defined clearly using readily recognisable physical features that are likely to be permanent such as roads, fences, building footprints and railway embankments.**”

Waverley Borough Council, Local Plan Part 1 – February 2018

- The Full Inspector’s Report states:
 - Para 71; “As previously discussed, there is a **pressing need for housing** in Waverley, and a **serious issue of housing affordability. Delivering the housing to meet the needs of present and future generations is a key aspect of the social dimension of sustainable development.** The Council has acknowledged that it is not possible to meet identified housing need solely within its towns and villages and has recognised that the implementation of a sustainable spatial strategy will require a proportion of development to be located on Greenfield sites outside the main towns and larger villages, some of which fall within the Green Belt.”
 - Para 75; “The areas of land to be released from the Green Belt in the submitted plan as modified are **sufficient to cater for housing needs over the plan period and no further land will need to be released from the Green Belt in Local Plan Part 2.** There is a pressing need for new housing which should be delivered in accordance with the spatial strategy and sustainability objectives of the plan, and this need is such that the selective release of limited areas of land from the Green Belt, in the areas chosen, is justified and would not fundamentally undermine the purposes served by the Green Belt.”
 - Para 113; “**Having regard to the characteristics of these sites,** the important need to provide for additional housing, the fact that the release of both sites would enable strong new Green Belt boundaries to be established, and the limited impact that their release would have on the important characteristics of Green Belt function...”

Wyre Council – February 2019

- The Inspector’s Report states:
 - Para 38; “Poulton-le-Fylde..... has a good range of services and facilities and is well served by sustainable travel modes... Although traffic congestion is highlighted as an issue, it is a location where significant allocations would contribute to meeting the housing requirement in a sustainable manner.”
 - Para 40; “The release of the land from the Green Belt would make **a significant contribution to meeting housing needs in a sustainable location and would cause limited harm to the Green Belt**”.

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Guildford Local Plan: Strategy and Sites (2015-2034) – March 2019

- The Full Inspector's Report states:
 - Para 78; "The submitted Plan alters Green Belt boundaries to accommodate development around the Guildford urban area, at certain villages and at the former Wisley airfield. It also proposes new Green Belt between Ash Green village and the Ash and Tongham urban area."
 - Para 79; "Guildford has a **pressing housing need, severe and deteriorating housing affordability and a very serious shortfall in the provision of affordable homes**. There is additional unmet housing need from Woking."
 - Para 81; "It is **not possible to rely on increasing the supply of housing within the urban areas to obviate alterations to the Green Belt boundary**... about 30 sites have been discounted within Guildford town centre and 90 within the urban area";
 - Para 84: "...the plan needs to be **robust and capable of meeting unexpected contingencies** such as delivery failure or slippage on one or more sites. It needs to **be borne in mind that the housing requirement is a minimum figure, not a target**.....The amount of headroom between **potential housing provision and the housing requirement means it is not necessary to create safeguarded land which would have to be removed from the Green Belt to meet longer term development needs**, or to identify reserve sites to be brought forward should sites fail to deliver as expected."
 - Para 85: "...by **making allocations now, the Council have aimed to future proof the Plan**. This is in accordance with the NPPF which says that plans should have sufficient flexibility to adapt to rapid change. The Plan clearly demonstrates **a flexible, integrated and forward-looking approach towards meeting present and future needs in the Borough** and towards encouraging more sustainable modes of travel".

Broxtowe Borough Council – October 2019

- Notably this Local Plan Part 2 contained Green Belt releases despite the open letter written by the then Housing Minister Esher McVey stating that she required evidence that a brownfield first policy was being pursued.
- The Inspector's Report states:
 - Para 26; "...in the context of NPPF's expectation to significantly boost the supply of housing and support growth, as well as the **need to reduce the risks to delivery over the whole plan period, the proposed level of housing above the ACS [Aligned Core Strategies] housing requirement and the principle of Green Belt land to support this provision....is justified**".

Bolsover District Council, Local Plan for Bolsover District, Inspector's Report – January 2020

- The Inspector's Report states:

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- Para 157; “Although much of the District is outside the Green Belt, **the limited supply of appropriate sites in sustainable locations to meet the employment need, along with the minimal harm to the Green Belt from the removal of these two parcels and the sustainable nature of the development proposed**, which would be sited adjacent to Clowne in accordance with the spatial strategy, **would amount to the exceptional circumstances** required to remove them from the Green Belt.”

Runnymede Borough Council – May 2020

- The Inspector’s Report states:
 - Para 55; “ In conclusion, for the reasons set out above, there is compelling evidence that in principle, exceptional circumstances exist which justify altering the Green Belt boundary in the Plan. In particular, it is **justified to seek to meet as much of the housing need as possible, including needs of Gypsies, Travellers and Travelling Showpeople**”.
 - Para 58: “The Plan’s spatial vision is expressed in a strategy that focuses most development over the Plan period in and around Addlestone, Chertsey and Egham, which are the 3 higher order centres in the borough, together with the development of **a new garden village in the Green Belt at Longcross which includes a significant element of previously developed land**”.
 - Para 92; “In particular the SSMA and sustainability appraisal have adequately addressed the likely effect of LGV [Longcross Garden Village] on an appropriate range of factors, and especially its accessibility and **its role in delivering sustainable development**. The quantity of development and mix of residential, employment, community and other uses that are proposed for the new village would help underpin significant improvements in accessibility by sustainable modes of transport”.
 - Para 93; “Also while the site is located on the western fringe of the borough, away from the main urban concentrations along the A320 corridor, **much of it is previously developed land; and it provides a unique opportunity to meet large scale development needs in a high quality village setting that will form an integral part of the sustainable development of Runnymede**”.

Cherwell District Council, Cherwell Local Plan 2011-2031 (Part 1) Partial Review – August 2020

- The Final Inspector’s Report states:
 - Para 45; “**...there a number of factors in play that combined, lead me to the firm conclusion that the exceptional circumstances necessary to justify the alterations proposed to Green Belt boundaries have been demonstrated.**”
 - Para 46; “**Chief amongst these is the obvious and pressing need to provide open-market and affordable homes** for Oxford; a need that Oxford cannot meet itself. On top of that, in seeking to accommodate their part of Oxford’s unmet need, the Council has undertaken a particularly rigorous approach to exploring various options. That process has produced a vision and a spatial strategy that is very clearly far superior to other options...”

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South Oxfordshire District Council, South Oxfordshire Local Plan, Inspector's Report – November 2020

- The Final Inspector's Report states:
 - Para 88; "Having regard to the **significant level of housing need** discussed in Issue 1, the **need to maintain a delivery buffer ("headroom") to ensure the Plan is resilient**, discussed in Issues 1 and 4, the range of factors discussed in this Issue, and the more **detailed site analysis** contained in Issue 3, **exceptional circumstances exist for the release from the Green Belt of all the relevant site allocations**. These exceptional circumstances extend to meeting employment and social needs as well as housing needs on the strategic allocations in order to achieve balanced, sustainable and well-integrated development."

Welwyn Hatfield Borough Council, Inspector's Letter – June 2021

- Following virtual Hearings in February and March 2021, the Inspector's Letter states:
 - Para 7; "...the distribution of development should reflect the plan's Development Strategy, which requires a proportionate distribution of housing between the two main towns and the excluded villages. Having arrived at that in general numerical terms, **you will then need to comparatively assess the weight of evidence determining exceptional circumstances to remove land from the green belt on a site by site basis in the different locations. Those sites that cause least harm to the green belt's openness and purposes whilst at the same time favouring those that score best from a sustainability perspective should be chosen.**"
 - Para 9; "Those sites that are to be removed from the green belt should be accompanied by a statement of the exceptional circumstances that justify their removal from it."

Woking Borough Council, Inspector's Report – August 2021

- **Issue 3 addresses whether exceptional circumstances exist to justify proposed revisions to Green Belt boundaries and whether the approach is justified, effective and consistent with national policy. The Inspector's Report on the Examination of the Site Allocations Development Plan Document states:**
 - **Para 101:** "...it is clear that the release of Green Belt sites for residential development is justified by the Core Strategy not only in quantitative, but also in qualitative terms. This approach is clearly consistent with the Framework insofar as it requires planning policies to identify a sufficient supply *and mix* of sites; and that the *size, type and tenure* of housing needed for different groups should be assessed and reflected in planning policies (with my emphases)."

6. Exceptional Circumstances

6.1. This section sets out the matters that amount to Exceptional Circumstances to justify amending the boundary of the Green Belt in SHBC as part of the new Local Plan. As the section on case law establishes, various factors including housing need are capable of justifying a change to Green Belt boundaries alongside wider spatial requirements of an authorities' area.

6.2. Exceptional circumstances within SHBC consist of;

- **Local Authority Wide Considerations:**

- The heavily constrained nature of the Borough (74% affected by Green Belt or environmental constraint, with the remaining areas mostly already built up to boundaries);
- Housing need - to provide land to achieve and meet identified development needs and ensure a balanced mix of homes achieved through a range of sites (including for Gypsy and Travellers);
- Inability of other nearby local authorities to assist with meeting all of SHBC's unmet housing needs;
- Employment need – opportunity to provide additional jobs, close to existing settlements (Woking / Ottershaw);
- The unavailability of suitable other brownfield sites and underutilised land within settlement boundaries (on the basis of SHBC's own evidence).

- **Site Specific Considerations relating to Fair Oaks:**

- Previously Developed Land (49 ha);
- Limited contribution to Green Belt Purposes;
- Compensatory improvements;
- Opportunity for Sustainable Development/ To be well served by public transport
- Benefits of development.

Heavily constrained nature of the Borough

6.3. The extent of geographical constraints in a Local Planning Authority area is a significant piece of evidence to justify Exceptional Circumstances, as evidenced by the preceding case law in Section 5.

6.4. It is collectively acknowledged that Surrey Heath has a restricted housing land supply with a high proportion of the area subject to national planning constraints and policies such as Green Belt and SSSIs. The Thames Basin Heaths Special Protection Area (SPA) has further impact on available supply.

6.5. In total, 44% of the land within the Borough is located within the Green Belt. The Thames Basin Heath SPA covers approximately 23% of the Borough and the associated 400m buffer zone affects a further 19% of the Borough, including land around Camberley and Frimley.

Appendix 4 - Green Belt Exceptional Circumstances

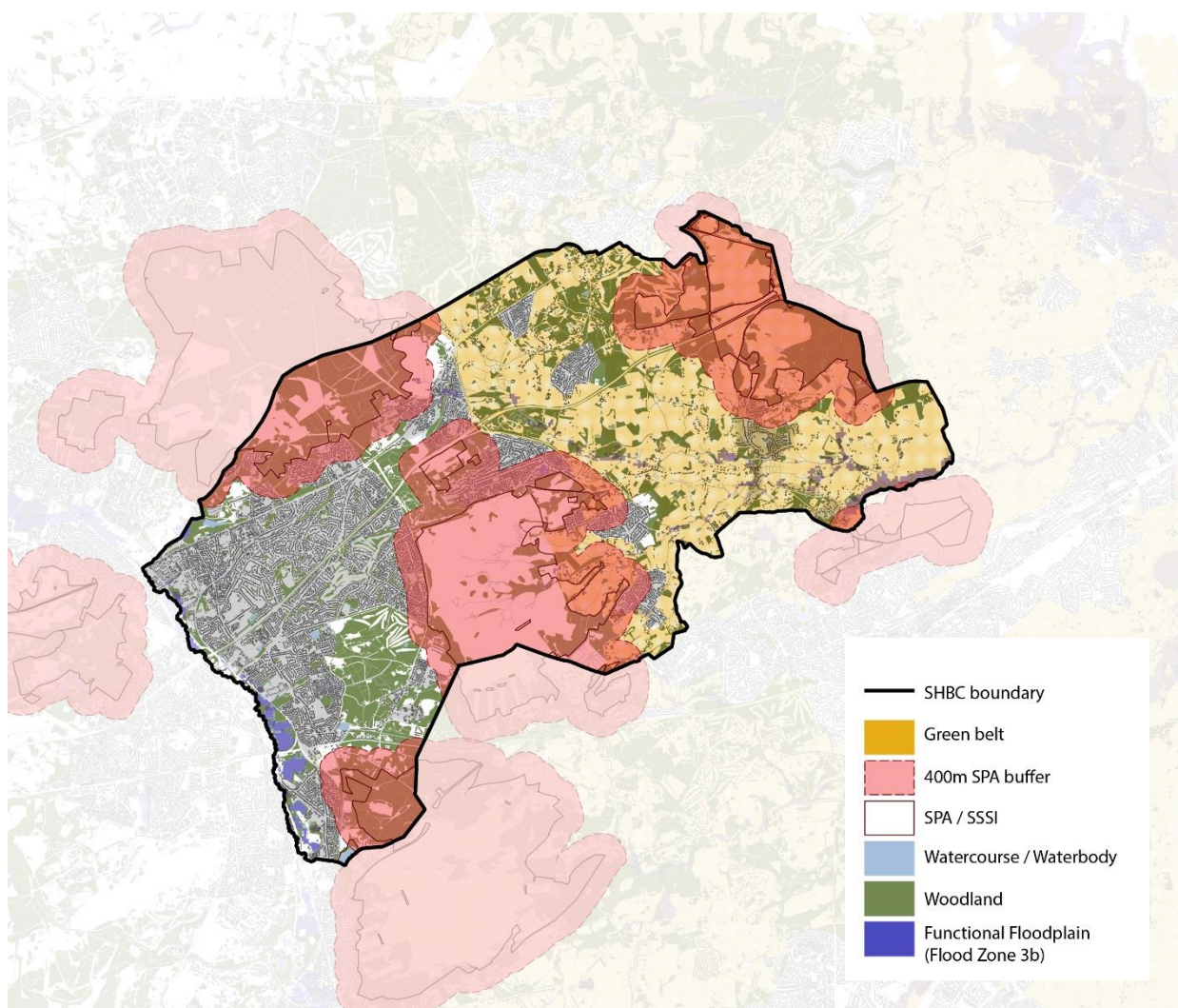
On behalf of Vistry Group



6.6. The SHBC Interim Capacity Study (April 2018) identifies that “approximately 45% of land within the Borough is affected by policy and environmental constraints which represent an absolute constraint to residential development, with an additional 29% of land (over and above that affected by absolute constraints) designated as Green Belt.....” (paragraph 3.6.6). **Therefore a total of 74% of land in SHBC is affected by absolute constraints or Green Belt.**

6.7. These constraints are mapped on Figure 6.1.

Figure 6.1: Constraints in SHBC



6.8. Figure 6.1 demonstrates the limited capacity available, which is particularly poignant when also taking into account existing built development and woodland.

6.9. The largest areas of undeveloped land (in white, above) are as follows, and consist of land already being built out for housing, or sports and leisure grounds:

- Sports fields at Tomlinscote School and Sixth Form College;
- Sports fields at the Royal Military Academy;

Appendix 4 - Green Belt Exceptional Circumstances

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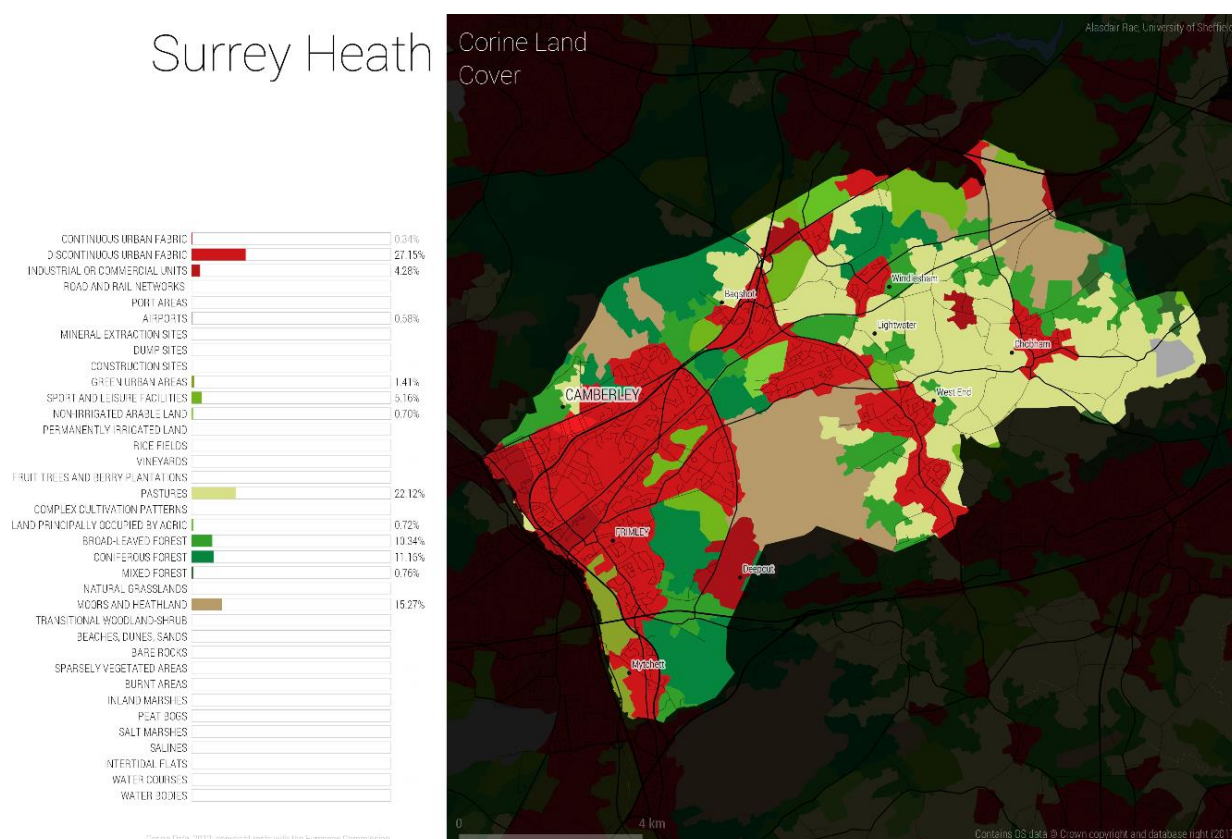
- Part of Bagshot Park;
- Sports fields at Deepcut Barracks, which is already being built out for housing;
- Land Adjoining Malthouse Farm, West End, which is being built out by Martin Grant Homes;
- Land North Of Beldam Bridge Road, West End, which is being built out by Taylor Wimpey.

6.10. Therefore, the lack of unconstrained, suitable and available land is clear.

6.11. Indeed, academic research by the University of Sheffield has established that 31.77% of SHBC is urban; defined as Urban Fabric and Industrial or Commercial Units, and another 7.15% as Airport, Green Urban Area, and Sport and Leisure Facilities (Cole, B., King, S., Ogutu, B., Palmer, D., Smith, G., Balzter, H. (2015). Corine Land Cover 2012 for the UK, Jersey and Guernsey. NERC Environmental Information Data Centre).

6.12. This data is illustrated on Figure 5.2, which clearly shows previously developed land at Fair Oaks in the east of SHBC, already recognised by SHBC as a Major Developed Site in the Green Belt in the existing Local Plan.

Figure 5.2: Land Areas by Land Use - SHBC



6.13. Although the general extent of the Metropolitan Green Belt within Surrey was first established through the 1958 Surrey Development Plan, the precise outer boundary of the Metropolitan Green Belt within Surrey Heath was set down within the Surrey Heath Local Plan 1987.

Appendix 4 - Green Belt Exceptional Circumstances

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- 6.14. Since 1987, Surrey Heath has developed and adopted three successive plans for the Borough, all of which have maintained the same Green Belt boundaries.
- 6.15. While the boundaries set down in the Local Plan 1987 have survived well beyond their original plan period, the expanse of significant constraints within SHBC coupled with factors listed above demonstrate it is inevitable that boundaries must be revised when considered next to factors such as housing need. A review is arguably long overdue.

The lack of suitable of sites to the west of the Borough outside settlement boundaries/Green Belt

- 6.16. It is acknowledged that land to the west of the Borough is outside the Green Belt, albeit there are still a number of constraints on this land (i.e. Special Protection Areas, Sites of Nature Conservation Importance, flooding and woodland). Greenfield land outside the Green Belt is not necessarily preferential to PDL land within the Green Belt, such as Land at Fair Oaks. The fact that Green Belt land should not be seen as a last resort was confirmed in the Compton High Court case discussed above. As identified elsewhere in this report, national policy has a clear emphasis for effective use of brownfield land.
- 6.17. Notwithstanding this, we understand that SHBC have reviewed sites around Camberley (which are outside the Green Belt), and the draft Local Plan includes for 2,178 dwellings in Camberley. As shown in Figure 5.1, a large majority of this area is within the 400m SPA buffer or woodland, and/or would result in the coalescence of three settlements. Land to the west of Camberley is outside the administrative boundaries of SHBC, is the subject of flooding or is a Site of Nature Conservation Importance (SNCI). Largely land to the north and south-east is constrained by SPA or SNCI, and land to the west is constrained by SPA or SNCI. There are small pockets of greenfield land to the east however these are limited and development could lead to coalescence of Camberley with Deepcut.
- 6.18. In this regard, there is a lack of suitable sites outside the Green Belt. Albeit even if there was a suitable site(s) these are likely to be greenfield, and therefore would not necessarily be sequentially preferable to a PDL site in the Green Belt or result in sustainable development.

The need for housing / Gypsy and Traveller pitches

- 6.19. Housing need in this area is severe. The median affordability ratio based on median house price to median income is 12.08 for SHBC, compared to a National ratio of 8.14 (based on 2021 data released by ONS in March 2024).
- 6.20. The affordability position is exacerbated by a historic under delivery of affordable housing against targets. Between 2017-2023 SHBC delivered 489 affordable units in total. This equates to an average of circa 82 units per year. SHBC latest Annual Monitoring Report dated June 2022, identifies that around 17% of the housing completions have been affordable, significantly less than required. Within the housing market area (comprising both Hart District Council and Rushmoor Borough Council), there is also historic under delivery. Between 2015 and 2023, Hart District delivered 26% compared to a target of 40%. Notably in the Inspector's report for Hart District, the Inspector recognised the affordable need was for 306dpa (5,500 homes over the plan period).

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- 6.21. In relation to Runnymede and Woking, these authorities have delivered 20.8% (2015 – 2023) and 18% (2013 – 2020) respectively. Essentially none of the four authorities have met their affordable housing target and the majority are significantly lower. This demonstrates the acute lack of delivery of affordable housing, and the importance of delivering affordable housing in SHBC.
- 6.22. The Government is committed to increasing housing delivery as set out in the 2024 consultation NPPF. This sees all an increase in housing need for all Boroughs/Districts in Surrey, as set out in Table 2.1 above.
- 6.23. The proposal will include circa. 640 affordable homes as defined by the NPPF 2023. This would represent a significant uplift in the net delivery of affordable homes in SHBC over the Local Plan period to date, and will therefore make a critical and substantial contribution to an acute housing need locally.
- 6.24. In relation to Gypsy and Traveller accommodation, the Gypsy and Traveller Accommodation Assessment (GTAA) (2020) sets out the overall need for pitches in SHBC from 2020-2040. The GTAA shows a need for 35 pitches over the 20 year period. In addition as recognised in the draft Local Plan, the GTAA also identifies a need for a further 29 pitches for Gypsy and Traveller households that do not meet the planning definition. Vistry's proposals for Fairoaks include 12 Gypsy and Traveller pitches, which could be delivered within the first five years of the plan and therefore make a significant contribution to SHBC's overall need. The draft Local Plan has failed to provide for this need and only allocates circa 8 pitches.

Inability of other local authorities to assist with meeting all of SHBC unmet housing needs

- 6.25. The NPPF 2012, Draft NPPF 2018 and NPPF 2019, NPPF 2021 are now superseded by the NPPF 2023. Whilst this (and the NPPF 2019) eradicates reference to Housing Market Areas altogether, paragraph 146 states that prior to Exceptional Circumstances being demonstrated, the strategy assessed at Examination will need to have been "*informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground*".
- 6.26. In addition, removal of reference to the housing market area means that SHBC must now consider housing needs beyond just Hart and Rushmoor, in particular Woking.
- 6.27. Notably, Hart District Council's Housing Numbers and Spatial Strategy Topic Paper (dated August 2018) concludes that [emphasis added]:

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“Indeed it is surprising to us that the site [Fairoaks] was not already included in the SLAA bearing in mind you made a Garden Village bid for the site in 2016. It is clear from your website, in a letter from the Homes and Community Agency dated 9 March 2017, that although Fairoaks garden village was not one of the 14 Garden Villages announced in January 2017, you were allocated capacity funding of £75,000 from the Homes and Community Agency to help develop your strategy for the garden village proposal.”

- 6.28. The Council further dictates that: ***“As a minimum we would expect to see the site appraised in the next iteration of the SLAA (in accordance with the SLAA methodology) and considered as a genuine plan-making option.”***

Rushmoor Borough Council

- 6.29. Rushmoor presented evidence at its Local Plan Examination in May 2018 to demonstrate that all of its potential housing capacity was required to provide sufficient flexibility to ensure delivery of the Rushmoor Local Plan. It did not identify any capacity to meet any unmet need in Surrey Heath, due to the particular circumstances of the Borough (Statement of Common Ground, November 2018, Para 3.5).

Rushmoor Borough Council adopted its Local Plan on 21st February 2019. Since this time a SoCG has been produced with Rushmoor dated 2024, that confirms it is unable to meet any unmet need from SHBC.

Runnymede Borough Council

- 6.30. As identified above, the NPPF 2023 (against which SHBC's Local Plan would be examined against) makes no reference to Housing Market Areas, and instead simply directs that authorities must consider the unmet needs of neighbouring authorities. This would also include Runnymede Borough Council ('RBC') and Woking Borough Council ('WBC').

- 6.31. Runnymede's Local Plan was adopted by Full Council on 16 July 2020. The Plan includes proposals to alter its Green Belt boundary based on Exceptional Circumstances (see comments on the Inspector's report above), and a shortfall in their housing supply, albeit minimal. In addition the length of the plan period was amended from 2035 to 2030 as a result of difficulties in meeting housing need. The Inspector identified the need for an immediate review commencing in 2021. RBC is therefore not planning on accommodating any of SHBC's unmet housing need.

Woking Borough Council

- 6.32. Woking adopted its Core Strategy in 2012, which set a housing target of 292 dpa and 4,964 dwellings over a 17-year Plan period. It also undertook a Green Belt review in 2014 and concluded the review is necessary to enable the Council to identify sufficient land to meet its future housing requirement and other development needs. Given the requirement in the NPPF 2023 to update Local Plans every 5 years, Woking will need to update its Local Plan. Such a significant uplift suggests it is extremely unlikely the authority will be able to accommodate SHBC's unmet housing need on top of its own. Notably in this respect, it was recognised as part of the HDC Local Plan Examination that Woking was unlikely to be unable to accommodate its own housing needs.

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- 6.33. Within the context of neighbouring authorities not being able to accommodate all of SHBC needs, the importance of SHBC accommodating its own need is poignant, particularly when you consider affordable housing.
- 6.34. In respect of affordable housing, there is a significant need in SHBC and its neighbouring authorities, which is not being met (as identified in paragraph 6.20 and 6.21 above). HDC only have one strategic site allocation at Hartland Village, which will only deliver 20% affordable housing. The Inspector examining the HDC Local Plan identified the need to deliver additional affordable housing.
- 6.35. As such, the inability of other local authorities to assist with meeting all of SHBC's unmet housing needs is clearly an Exceptional Circumstance.

The unavailability of suitable brownfield sites and underutilised land within settlement boundaries

- 6.36. SHBC has already undertaken a draft Strategic Land Availability Assessment (2019, 2021, 2023), Surrey Heath Sites Appraisal (2018), and Interim Capacity Study (2018) in which previously developed sites are considered. The SLAA also confirms that the assessment sought to optimise capacity in the most sustainable locations in the Borough such as Camberley Town Centre (Para 3.4).
- 6.37. Even with a 'fine-tooth comb' suitable brownfield sites and underutilised land cannot meet housing need in SHBC. This is reinforced by SHBC's brownfield land register, which shows that sites of any scale (of which there are few) already have full or outline planning permission; Deepcut Barracks, Windlesham Garden Centre, and FC Brown Ltd, Bisley. Despite Deepcut being granted planning permission in 2014, SHBC have still sought to include the allocation within their housing numbers, this is due to the close delivery on this site. This slow delivery demonstrates the importance of including a reasonable buffer/ contingency when calculating housing numbers, which SHBC have failed to do.
- 6.38. In addition, SHBC have included draft allocations in Camberley Town Centre for 1,548 units, with two large site allocations for 524 and 340 respectively. The site density for London Road would be 289dph and storey heights would be up to 15-storeys, the second draft allocation at Last East of Knoll Road would comprise a density of 262dph and would comprise 4-7 storeys. This demonstrates SHBC are already making as much use as possible for brownfield sites.
- 6.39. With regard to the NPPF criteria of Exceptional Circumstances therefore, it is evident SHBC has already made as much use as possible of suitable brownfield sites and underutilised land, and optimised the density of development. SHBC have proposed to amend Green Belt boundaries, and hence whilst the Local Plan states no Exceptional Circumstances are needed, SHBC have already triggered to need to demonstrate them.
- 6.40. The SLAA recognises that the supply of homes drops significantly from 2031 onwards. Land at Fair Oaks is identified as 'not currently developable' in the 2023 SLAA due to its Green Belt location. However as this report demonstrates there are Exceptional Circumstances for SHBC and Fair Oaks specifically that mean the Site is deliverable over the Local Plan period.

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Previously developed land within the Green Belt/Grey Belt

- 6.41. It is clear from the evidence that the optimal opportunity to make use of previously developed land is at Fairoaks. As stated above, Paragraph 147 of the NPPF 2023 directs that: *"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport."*
- 6.42. Fairoaks Airport is currently recognised in the adopted SHBC Local Plan as being a Major Developed Site within the Green Belt. The wider Fairoaks site is 49ha, or 32% PDL. The majority of built form proposed at Fairoaks is within the PDL area of the site, with the more sensitive land being utilised to provide other public benefits such as open space and the strategic SANG. SANG and open space are compatible with Green Belt purposes and therefore would not need to be removed from the Green Belt.

Contribution to Green Belt purposes

- 6.43. The NPPF 2023 clearly sets out the five purposes of the Green Belt at Paragraph 143. Since Fairoaks had a previous planning application, it is at the advantageous position of having had a detailed assessment of the contribution the site makes to the Green Belt.
- 6.44. Notably as set out in the representations, SHBC in their Green Belt evidence recognise that the previously developed land at Fairoaks provides no or a weak function to the Green Belt. A large proportion of the developable area is situated in this previously developed area ensuring limited harm to the Green Belt.
- 6.45. The planning application submission contained a detailed assessment of the contribution Fairoaks makes to the Green Belt and concludes the site only has a limited contribution to one of the five purposes. The following points are however highlighted here in respect of the five purposes:
- **Purpose 1: To check the unrestricted sprawl of large built-up areas;**
 - The closest settlements to the Site (within 3km radius of the centre of the Site) are Chobham, Ottershaw and Woking. In relation what contributes a large built-up area, the only applicable settlement is Woking. The distance between the southern boundary of the Site and closet properties in Woking is circa 1.4km. The land between the Site and Woking is Green Belt and comprises Horsell Common (part of the Thames Basin Heath SPA) and Heather Farm SANG. These designations provide an in perpetuity barrier to the sprawl of Woking and the development of Fairoaks. Fairoaks is therefore not connected to, or contiguous with Woking and therefore does not contribute to Purpose 1.
 - Delivery of Fairoaks would not impinge on the strategic objectives and purpose of the Metropolitan Green Belt.
 - In relation to Ottersham and Chobham, there is clear separation of the Site from these settlements and the nature of land between them being Green Belt and SANG, would prevent outward expansion of the Site closer to these settlements.
 - **Purpose 2: To prevent neighbouring towns merging into one another;**

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- As identified above, the settlements of Chobham, Ottershaw and Woking are the closest to the Site. Beyond Fairoaks there is land separating it from neighbouring settlements and the Site still stands apart from them. Moreover, Land at Fairoaks includes extensive SANG provision to the east and south which will ensure the proposed development will continue to stand apart from neighbouring settlements.
 - The proposed SANG provision plays an essential role in the development of Land at Fairoaks in seeking to retain the space between the site and adjacent towns. Given the significance of the SANG in mitigating impacts on the TBH SPA and the overprovision of circa 25ha assisting with further development elsewhere, it is clear that this land will continue to ensure that Fairoaks stands alone in the long term.
- **Purpose 3: To assist in safeguarding the countryside from encroachment;**
- As noted above, the Site contains 49ha of PDL which is largely urban in character. In addition, agricultural land to the east is considered, on balance, to possess a largely rural open character. The Site therefore performs moderately in relation to this purpose. Albeit it is important to note that the proposals respond to these varying characters and therefore any harm is only considered limited.
- **Purpose 4: To preserve the setting and special character of historic towns;**
- Whilst the surrounding settlement of Chobham, Ottershaw and Woking contain historic cores, there is modern development between the Site and the historic parts of these nearby settlements. The Grade II Listed Ottershaw Mansion is the closest statutory heritage asset to Land at Fairoaks. However, this does not represent the special character of setting of an historic town. Therefore, it is not relevant in relation to the Green Belt purpose. Based on the above, the Site does not contribute towards this purpose.
- **Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land**
- The most recent Strategic Land Availability Assessment (SLAA) and previous draft Local Plan indicate that opportunities for urban regeneration have been accounted for as part of the SLAA exercise. Yet, there is still an unmet housing need in the borough. The shortfall indicates that there is not sufficient underused or derelict land available in the borough for use to provide much needed housing. The Site therefore does not contribute to this purpose.

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On behalf of Vistry Group



- 6.46. Overall, the Site is therefore considered to make a weak contribution to the five purposes. However, it is recognised that the varying characteristics of the Site will make different contributions to the Green Belt if viewed in isolation.
- 6.47. With regards to the character of the Site, the western section comprises the employment buildings and operational airfield. This area already contains built form and is therefore less sensitive to development compared to the eastern portion which is more sensitive. This sensitivity has informed the proposals for the land at Fair Oaks, with the majority of the built form being located within the least sensitive part of the site.
- 6.48. Moreover, Land at Fair Oaks includes expansive areas of open space, which are not proposed for release from the Green Belt. Rather it would be the area proposed for development that would be released, with the larger areas of open space (and therefore the more sensitive parts of the site) remaining as improved Green Belt (discussed further below).

Opportunity for Sustainable Development/ To be well served by public transport

- 6.49. Land at Fair Oaks would provide circa 1,500-1,800 new homes including specialised housing for the elderly, as well as substantial business floorspace. It is therefore of sufficient scale to be largely self-sustaining and genuinely mixed use. The combination generates demand for services and facilities proposed within the development;
- Two-form entry primary school, with the potential to expand to three-form entry if required.
 - Mixed use village centre, including community hub and local retail provision.
 - There is the potential for the development to support satellite health-care provision, with opportunity for GPs from the local area to hold a weekly clinic on-Site. This could be accommodated within flexible space within the community hub, pharmacy or elderly accommodation.
 - A sports hub including toilets, changing rooms and community space.
 - A modern sustainable transport offering including access to a community bus, electric vehicle infrastructure and attractive cycle links.
 - Sports pitches.
 - In addition, amenities in Woking town centre and its railway station are around 15 minutes cycle away.

Appendix 4 - Green Belt Exceptional Circumstances

On behalf of Vistry Group



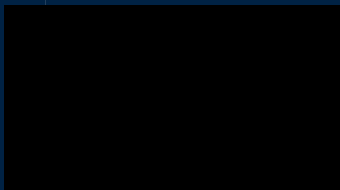
Compensatory Improvements

- 6.50. Land at Fairoaks will provide the necessary compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land as identified in paragraph 138 of the NPPF, through the provision of a circa 53 ha country park accessible to existing and future residents with over 5 miles of walking, cycling and horse riding routes. This park creates connectivity between the proposed SANG and existing green infrastructure in the surrounding area including Heather Farm SANG, McLaren Park and Ottershaw Chase SANG. In addition, 14 hectare of SANG is proposed for lowland heath restoration, which is a priority habitat in the Surrey Biodiversity Action Plan and Section 41 of the NERC Act 2006. The provision of the new heathland will act as a 'stepping stone' between component SSSIs of the Thames Basin Heaths SPA and will ensure that the project delivers a landscape-scale ecological benefit, improving the connectivity and resilience of the ecological network between the remaining heathland areas that compromise the SPA.
- 6.51. The release of Longcross from the Green Belt in RBC is similar to the case for Fairoaks, and which was found a sound approach by the Inspector in that:
- It can help SHBC meet its housing need, including affordable housing and needs of Gypsies and Travellers.
 - Both were new garden villages that include a significant element of previously developed land.
 - The quantity of development and mix of residential, employment, community and other uses would underpin significant improvements in accessibility by sustainable modes of transport.
 - Both developments provide a unique opportunity to meet large scale development needs in a high quality village setting, forming an integral part of the sustainable development.

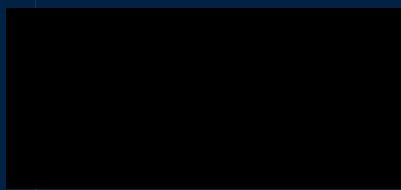
7. Conclusion

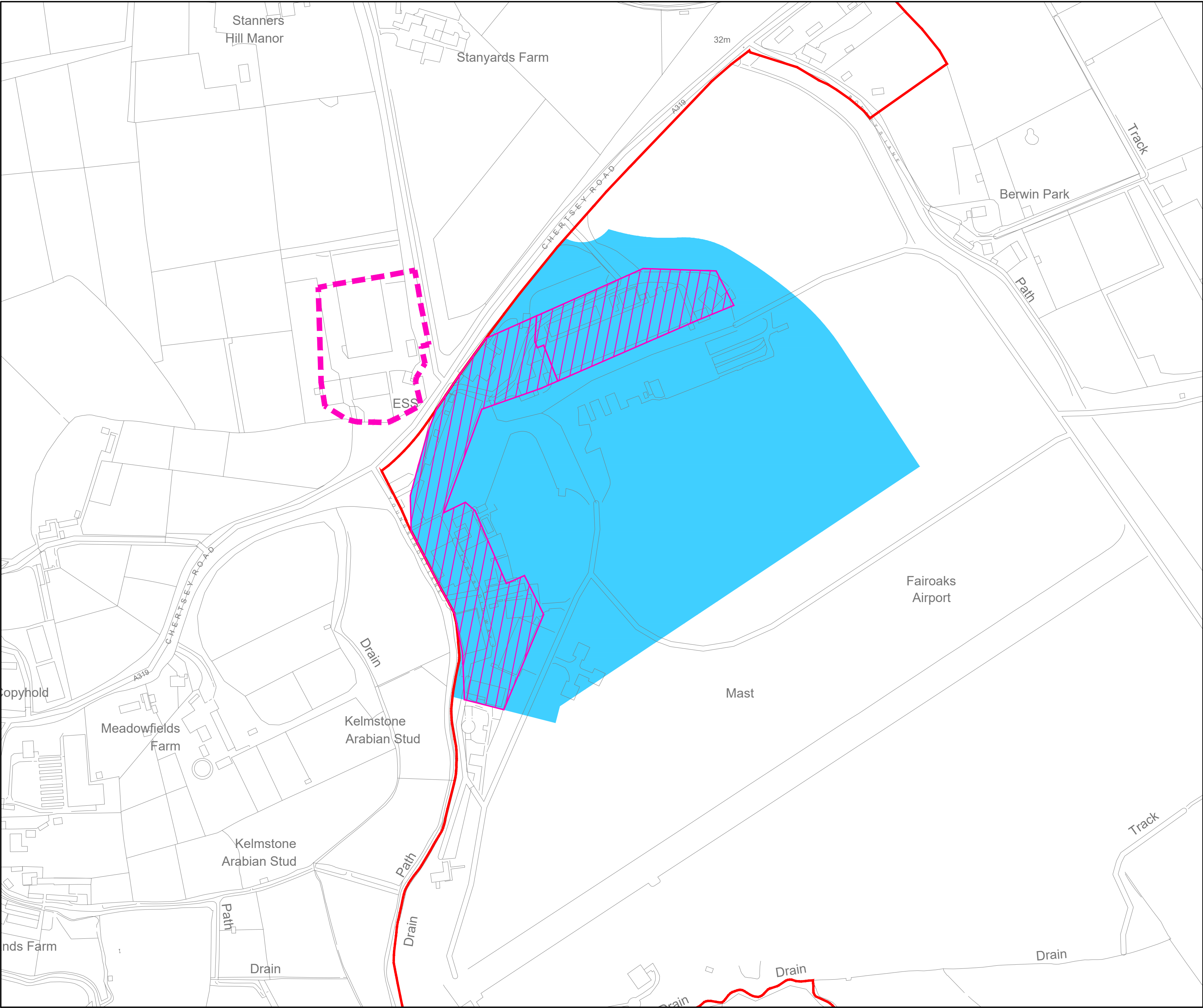
- 7.1. This Report has set out the arguments considered to amount to 'Exceptional Circumstances' that justify amendments to the Green Belt boundary in SHBC.
- 7.2. These are based on policy within the NPPF 2023, case law examples, and factors recognised within Inspectors' Report rulings. The factors are broken down into two categories both proven to be significant in a balance of judgement on Exceptional Circumstances;
- **Local Authority Wide Considerations:**
 - The heavily constrained nature of the Borough (74% affected by Green Belt or environmental constraint, with the remaining areas mostly already built up to boundaries);
 - Housing need - to provide land to achieve and meet identified development needs and ensure a balanced mix of homes achieved through a range of sites (including Gypsy and Traveller pitches). Notably as set out in Compton the housing needs do not have to be acute.
 - Inability of other nearby local authorities to assist with meeting all of the unmet housing needs from Surrey Heath;
 - Employment need – opportunity to provide additional jobs, close to existing settlements (Woking / Ottershaw);
 - The unavailability of suitable brownfield sites and underutilised land within settlement boundaries (on the basis of SHBC's own evidence).
 - **Site Specific Considerations relating to Land at Fair Oaks:**
 - Previously Developed Land (49ha);
 - Limited Contribution to only one of the five Green Belt purposes;
 - Opportunity for Sustainable Development;
 - Compensatory Improvements to the Green Belt;
- 7.3. The Government has sought to put in place its key pledges from the Manifesto on housing delivery, Green Belt and specifically grey belt through the introduction of the consultation NPPF. Should SHBC's Local Plan be examined under the 2023 NPPF or the consultation NPPF, there are Exceptional Circumstances in both instances for Land at Fair Oaks to be released from the Green Belt,

Charles Collins
Director



Katherine Munro
Associate Director





The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
A	18.09.24	J.W.	V.A.

- Site Boundary
- Proposed Employment Area
- Emerging Locally Important Employment Site (Policy ER3). - 3.39Ha / 8.39Ac
- Emerging Locally Important Employment Site (Policy ER3). (Outside of Site Boundary) -1.31Ha / 3.24Ac

Project
FAIROAKS

Drawing Title
COMPARISON PLAN: FAIROAKS EMPLOYMENT PROMOTION / EMERGING LOCALLY IMPORTANT EMPLOYMENT SITE

Date 17.09.24	Scale 1:2,500@A2	Drawn by J.W.	Check by V.A.
Project No 333101492	Drawing No RG-M-09	Revision A	

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Land at Fairoaks

REPRESENTATIONS TO DRAFT SURREY
HEATH LOCAL PLAN REGULATION 19
CONSULTATION

Addendum to 2022 Employment Market Update

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Executive Summary

This report is presented on behalf of the Vistry Group ('Vistry'). It updates the 2022 Employment Market Assessment that was prepared in support Land at Fairoaks through consultation at the Regulation 18 Preferred Options stage. This report responds to the consultation to the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19).

Vistry seek to extend the emerging local plan's employment land designation at Fairoaks Airport from about 3.6 ha (covering the existing estate) to approximately 14.5 hectares which would provide critical scale and flexibility to ensure the site plays the strategic role for which it is intended: to drive both local and sub-regional economic growth across the council's priority sectors. As currently configured within the confines of the council's new proposed designation as a Strategic Employment Site, the site remains narrow and awkwardly shaped. The site's ability to realise its full potential of becoming an even more diverse, dynamic employment cluster is limited. The site is also proposed to remain in the Green Belt which also continues to limit its potential.

The site is a sustainable, land-efficient way for the council to deliver new, much-needed employment land in the eastern part of the borough where there is relatively less economic activity. The council's evidence documents seek to demonstrate that it has sufficient supply to meet its identified need for employment land and premises. However this report identifies several concerns about the unusual and possible unsound towards evidencing its supply. They key concerns are:

Council Relies Entirely on Existing Employment Land to Meet Its Identified Need

No new employment land is allocated in the emerging plan; the council relies solely on existing employment sites. It is presumed that the council intends to submit the draft local plan ahead of the publication of the revised National Planning Policy Framework (NPPF) and therefore it would be examined under the current version. Under the revised NPPF, the council would be required to identify new employment sites. However, the current draft plan assumes that existing sites and premises can simply be substituted with new or repurposed premises that are suitable for new uses and can deliver equivalent levels of floorspace. This is unrealistic. Different employment property sectors have different locational requirements and different operational environments. In addition, several sites identified as having development capacity have considerable delivery barriers to the extent that they should not be considered available.

Council's Use of Vacant Premises as Part of Its Future Supply is Unusual and Possibly Unsound

The council identifies a large number of vacant premises as part of its supply even though its own evidence base document states that it is not part of its 'core supply'. The Employment Land Supply Assessment (2023) says that the sites have the *potential* to be part of the council's future supply but should not be considered part of supply. However, the council's Employment Topic Paper (2024) treats these vacant premises as a fundamental part of its supply, providing the council with over 37% (41,000 sqm) of its identified supply. It is highly likely that these redeveloped vacant premises won't end up providing the same amount of floorspace as what is currently there, even though the council assumes they will. Converting or redeveloping these premises is time-consuming and expensive. Also, the redevelopment of existing vacant premise represents a loss of existing premises as well as a gain of new premises – but this is not accounted for in the evidence base. Ultimately, the net change in floorsapce quanta from the redevelopment of vacant premises could be *de minimus*. Without these vacant premises which are not intended to be part of its core supply, there would be a considerable shortfall in employment floorspace.

There is an Ongoing Shortage of Employment Land that is Not Addressed in the Reg 19 Plan

The council's evidence base documents and our assessment identify an ongoing shortage of employment premises. This shortage prevents Surrey Heath from achieving its full economic potential. However, the emerging local plan is oriented towards meeting *future* need over the plan period and not towards addressing its endemic shortage.

There is an immediate need to make new employment land. Given the limited supply, the designation of an expanded employment land cluster in the form of Land at Fair Oaks would address the economy's immediate need. It would provide the council with an additional 11 ha of sustainably located new employment land.

The Council's Evidence Identifies Demand for Film Studios and Logistics; These Sectors Require New Sites

The updated evidence base recognises the importance of film studios and logistics as important drivers of growth in the area. These uses should be accommodated by a combination of existing and new sites.

1. Introduction

1.1. Overview and Summary

- 1.1.1. This report is made on behalf of Vistry Group ('Vistry') to Surrey Heath Borough Council ('Surrey Heath') in support of the extension to a proposed employment development that is called Land at Fairoaks in this report.
- 1.1.2. This report updates the 2022 Employment Market Assessment ('2022 report') that is in the Appendix of this report. The 2022 report was prepared for the consultation exercise on the emerging local plan at the Regulation 18 Preferred Options stage. This report responds to the Regulation 19 Pre-Submission ('Reg 19 plan') stage of the emerging local plan.
- 1.1.3. This report confirms that most of the key findings and conclusions that in the 2022 report are valid. The currently proposed allocation for employment land at Fairoaks Airport in the Reg 19 plan, whilst raising its status to a Strategic Employment Site, still falls short of optimising the site's potential or helping to address the shortage of employment land in Surrey Heath. This report concludes that to maximise the site's economic potential, the Reg 19 plan should extend the proposed employment land allocation to 14.5 ha.

1.2. Methodology

- 1.2.1. To inform the findings in this Addendum, the following analysis has been undertaken:
- Review and update the assessment of the draft local plan policies and evidence base;
 - Review the property market data for the relevant property market areas (PMAs); and
 - Summarise the key findings and conclusions that make the case for extending Fairoaks to 14.5 ha.

1.3. Structure

- 1.3.1. The chapters of the report are:
- **Chapter 1 – Introduction**
 - **Chapter 2 – Existing Site and Proposed Development** which includes a description of the site and its development potential.
 - **Chapter 3 – Policy and Evidence Base Context** which summarises the Reg 19 draft planning policies and evidence base.
 - **Chapter 4 – Property Market Assessment updates** the relevant property market dynamics in the PMAs.
 - **Chapter 5 – The Case for Extending Land at Fairoaks**

2. Existing Site and Proposed Development

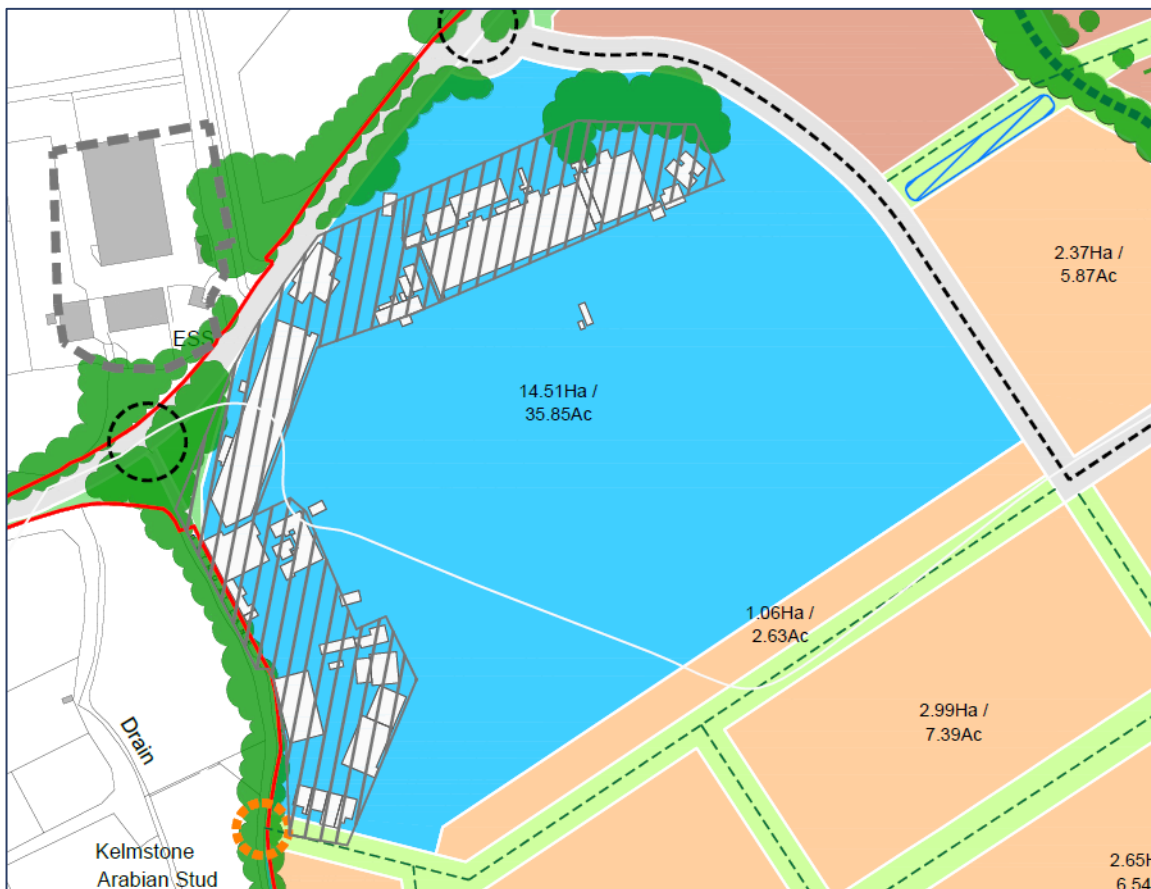
2.1. Introduction and Summary

- 2.1.1. This section presents the employment site called Land at Fairoaks that is proposed by Vistry for inclusion in the emerging local plan. This site would extend the proposed employment area in the Reg 19 plan to about 14.5 ha. The extended land would provide the necessary scale for the existing employment cluster to expand; ensure sufficient flexibility to accommodate a variety of new employment premises and sectors including possibly logistics and film studios; and facilitate wider placemaking objectives.

2.2. Site, The Existing Estate, and the Proposed Extended Estate

- 2.2.1. **Figure 2.1** presents the proposed employment that would sit within a wider mixed use masterplan. The subject site is in the Green Belt and comprises the existing employment estate (the hatched area which is also the footprint for the proposed Strategic Employment Land allocation in the Reg 19 plan) and additional development land. The proposed site in this representation extends the council's proposed designation by a further 10.9 ha. We estimate that if the estate were to expand to the full 14.5 ha, it could accommodate about 630,000 sqft of employment floorspace assuming a site coverage ratio of 40%.

Figure 2.1: Site Plan for Employment Element of Land at Fairoaks



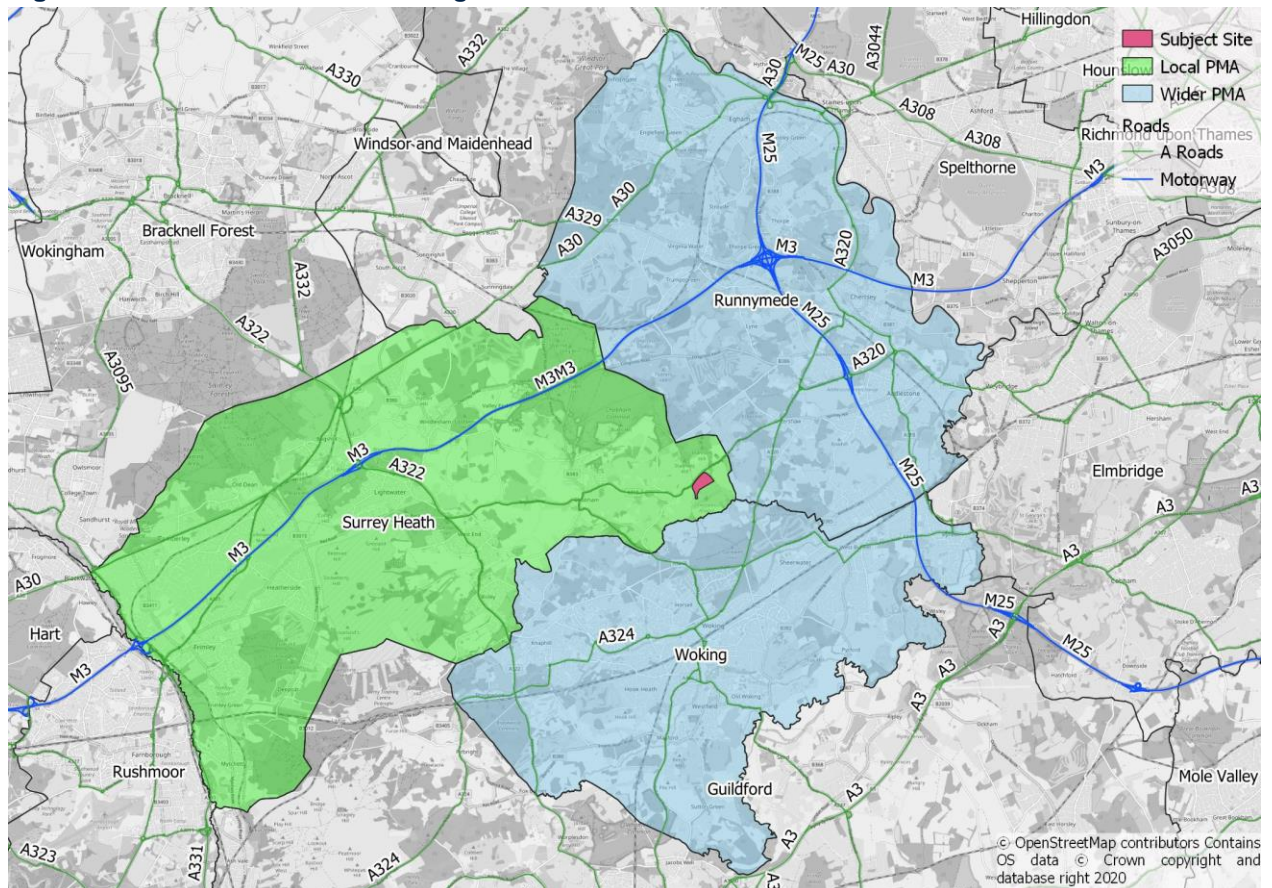
Source: Stantec, 2024

- 2.2.2. The site as proposed in the Reg 19 plan does not provide sufficient scope to create a more commercially

compelling proposition that could expand what is already a critical mass of economic activity. The 14.5 ha extended site would provide the scale for a more commercially attractive and viable employment cluster in the east of the borough.

- 2.2.3. **Figure 2.2** shows the Land at Fairoaks within the wider spatial context. It is strategically located close to the strategic road network. The location provides good access to Greater London, the wider South East and the South West.

Figure 2.2: Land at Fairoaks' Strategic Context



3. Policy and Evidence Base Context

3.1. Introduction and Summary

3.1.1. This section reviews policy and evidence base documents relevant to Land at Fairoaks which have been published since the 2022 report was submitted for the previous consultation exercise. This includes the Surrey Heath Local Plan (2019-2038): (Regulation 19) and three additional evidence base documents. The evidence base documents are:

- Surrey Heath Employment Land Technical Paper (December 2023)
- Surrey Heath Employment Land Supply Assessment (December 2023)
- Employment Topic Paper (July 2024)

3.1.2. For the assessment of earlier evidence base documents, please see the 2022 report in the Appendix.

3.1.3. The assessment of the policy and evidence base documents identify a range of shortcomings that possibly make the council's approach unsound. In particular, its reliance on vacant premises on existing employment land as a source of about 37% of its total supply is unusual.

3.2. Policy Context

Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19)

3.2.1. Paragraph 4.39 states that Surrey Heath is characterised by a buoyant economy with a diverse economic base. Strong sectors include:

- Engineering and manufacturing;
- medical technology,
- information technology (IT);
- financial /businesses services;
- logistics / distribution; and
- health.

3.2.2. Paragraph 4.45 states that the evidence base has found there were net losses in offices and industrial floorspace although there were gains in other employment premises types. It notes that maintaining a supply of employment land is essential.

Draft Policy ER1: Economic Growth and Investment

3.2.3. The policy emphasises the growth and retention of existing businesses and inward investment. Sites that are identified as Strategic Employment Sites and/or Locally Important Employment Sites for Employment Use should be protected and enabled for intensification. (Fairoaks Airport is proposed to be a Strategic Employment. Whilst there is potential for intensification, its expansion would be more beneficial to the economy by increasing the likelihood of attracting inward investment.)

- 3.2.4. The policy encourages the growth of small and micro businesses by protecting employment units for use by a small business or industry and supporting small to medium sized employment units on Strategic and Locally Important Employment sites.
- 3.2.5. The narrative that accompanies the policy says in Paragraph 4.50 that if it were assumed that demand in one land use category can be supplied by losses in another, then overall total employment is very modest. However, this an assumption that is not borne out by any evidence.
- 3.2.6. Paragraph 4.51 states the identified requirement for between 10 and 19 hectares of employment land which is based on the ability to convert one employment land use for another.
- 3.2.7. Paragraphs 4.52 and 4.53 state that there is a pipeline of development projects and potential redevelopment of vacant premises to ensure there is sufficient employment land.

Draft Policy ER2: Strategic Employment Sites

- 3.2.8. The policy identifies sites designated as Strategic Employment Sites (SES). The sites are predominantly located in the west of the borough and generally cater to medium sized to large industrial parks with a of occupiers ranging from multinational companies to small and medium enterprises.
- 3.2.9. The existing commercial estate at Fairoaks Airport (presented in **Figure 2.1**) is proposed to be part to the Fairoaks Airport and Chobham Business Centre, Chobham SES. This is a welcome change from the Regulation 18 version of the emerging local plan. However, the policy continues to limit the allocation to the existing estate, still situated in the Green Belt and not a more economically beneficial extended site.
- 3.2.10. The policy states that the redevelopment and regeneration of SESs will be supported to provide employment floorspace that meets the needs of the future economic growth needs of Surrey Heath and the Functional Economic Area (FEA). (The FEA is defined as Surrey Heath, Hart District Council and Rushmoor Borough Council.)
- 3.2.11. Paragraph 4.62 states that these SESs fulfil a strategic function within the Surrey Heath FEA and have the greatest alignment to the economic development priority sectors.
- 3.2.12. Paragraph 4.65 states that the SES designation for Fairoaks excludes that part of the site that comprises the runway and wider outlying areas. It states that the defined SES contains a range of uses associated with the aviation sector including specialist aviation and avionics engineering and maintenance enterprises, as well as a range of businesses not related to the aviation industry. The site is identified as being of strategic importance for employment, recognising the number of businesses at the site and the requirement in the NPPF to take account of the economic value of general aviation and the Government's General Aviation Strategy. The strategic importance, diversity of uses, and sub-regional importance justify the site's expansion.
- 3.2.13. Savills Observations
- 3.2.14. Draft Policy ER1: Economic Growth and Investment assumes easy substitutability of employment land from one use to another so that no new employment land needs to be allocated. But sites cannot be easily substituted. The characteristics of a site that is attractive for office use will not be one that is attractive for

industrial use.

- 3.2.15. SESs fulfil a strategic function within the FEA and are, by definition, aligned with economic development priority areas. This should justify the extension of the subject site. The current limited proposed allocation limits the economic potential that Land at Fairoaks could deliver.

3.3. Evidence Base Documents

Employment Topic Paper (ETP) (2024)

- 3.3.1. The ETP sets out the council's most recent assessment of the balance of supply and demand for employment land and floorspace. It summarises the analysis in two technical papers that were prepared by Iceni in 2023. The supply side of employment land and premises is covered by the Employment Land Supply Assessment (2023). The demand side (and part of the supply side) is covered by the Employment Land Technical Paper (2023).

- 3.3.2. **Table 3.1** sets out the council's most recent assessment of the council's overall supply-demand balance. It shows a surplus of 31,848 sqm of employment floorspace compared to the council's upper estimate of employment floorspace need. The ETP concludes that there is no need for the council to allocate new employment sites because there is sufficient capacity from a combination of recent completions, extant planning permissions, and residual capacity on existing employment sites and vacant premises.

Table 3.1 Surrey Heath Council's Estimated Employment Land Position

	E(g)(i/ii)	E(g)(iii), B2, B8	Total
<i>Demand</i>			
Upper Estimate of Need (sqm)	(15,800)	(63,000)	(78,800)
<i>Supply</i>			
Completions & Permissions 2022 – 2024) (sqm)	(4,086)	40,410	36,324
Supply (Undeveloped/partially developed employment land)			32,555
Supply (Redevelopment of Vacant Premises)			41,769
<i>Balance (Surplus/Deficit)</i>			
Surplus			31,848

Source: Savills, 2024; Surrey Heath Employment Land Technical Paper; Surrey Heath Employment Land Supply Assessment (December 2023); Employment Topic Paper

3.3.3. Savills Observations

- 3.3.4. The council's overall approach to supply is possibly unsound. It relies heavily on permissions for redeveloping existing employment land and from vacant premises. This is unlikely to provide sufficient range of choices for occupiers and fails to account for the loss of premises through redevelopment.

- 3.3.5. The council's approach also ignores the long-standing shortage of land for employment. The ongoing shortage continues to push up rental levels and puts financial pressure on occupiers. The council should make an allowance for its ongoing deficit by allocating additional land.
- 3.3.6. The council's reliance on existing employment land and vacant premises is likely to be inadequate for meeting its future needs. Some of the land is likely to be converted to residential use. Redevelopment of existing premises is often time-intensive, and some landowners may not be interested in redeveloping their land.
- 3.3.7. The supply of vacant premises is identified in the Employment Land Supply Assessment (2023) (summarised below) and states that it is not included within the core supply. However, the ETP treats this as a core part of its supply, providing the council with over 41,000 sqm. Also, it is likely to be the case that any redeveloped premises won't end up providing the same amount of floorspace as what is currently onsite. However, the council treats the vacant premises as if it would. Without these vacant premises that are not meant to be part of its core supply, the council has a considerable shortfall in employment floorspace.

Employment Land Technical Paper (ELTP) (2023)

- 3.3.8. This report updates the Employment Land Technical Paper Update 2019 which was published in 2020. A summary of the 2019 paper can be found in the Appendix.

Office Market Summary (2024)

- 3.3.9. Since 2019 the council's outlook for offices has turned much less optimistic. The report says there is a lack of demand. It says that any future positive demand will be for high-quality, modern offices. The council doesn't expect any inward investment in the office sector.

Industrial Market Summary (2024)

- 3.3.10. In 2019 the council identified about 1 year's supply of floorspace. The council's current evidence shows that the industrial market remains undersupplied and that this is causing high rental growth. Agency engagement concludes that the current low level of vacancy belies an even more constrained supply picture. The high rents are becoming unaffordable. Much of the existing premises are of poor quality and there is demand across all unit sizes.

Employment Land Demand Forecasts (2024)

- 3.3.11. In 2019 the council's estimate of employment land need was between -2.8 ha to 15.9 ha. The council's current assessment identifies that its need has increased to between 10.8 ha and 18.0 ha. The increased need for employment land is principally due to higher demand for industrial floorspace.

Employment Land Supply Position Based on Completions and Permissions (2024)

- 3.3.12. The report presents an estimate of floorspace supply based on recent completions and planning permissions for new employment floorspace. Relevant completions delivered about 23,000 sqm of employment floorspace. Planning permissions would result in a loss of about 5,000 sqm of employment

floorspace. This results in a residual need for employment floorspace of between 27,000 sqm and 61,000 sqm for its low and high estimates respectively (before identifying potential supply within vacant premises). The residual need figures are shown in Table 4.5 of the ELTP.

- 3.3.13. The report says that the supply picture is incomplete because consideration needs to be given to available land or premises which enable opportunities for new development or intensification/ regeneration of existing estates. (This is covered in the Employment Land Supply Assessment (2023) summarised below.)

Specific Employment Types

- 3.3.14. The report identifies several economic sectors where demand is expected to increase. Paragraphs 5.7 and 5.8 identify an increase in the demand for film studios. There is an expectation that there will be demand for both supply chain, spin off and potential film studio demand in Surrey Heath.

- 3.3.15. Paragraph 5.9 says there is strong demand for logistics to service the area's local populations. Also, because the borough accommodates three M3 junctions, it is a good location for large sub-regional logistics demand and could be located in a number of areas within Surrey Heath. It would be a policy choice to release additional land for such development.

3.3.16. Savills Observations

- 3.3.17. The council's estimate of employment floorspace need has increased since its previous assessment in 2019. However, no new employment land has been allocated. As the council has not allocated new employment sites, it is increasingly dependent upon its recent completions to demonstrate it is able to provide sufficient supply over the proposed plan period.

- 3.3.18. The ELTP concludes that the council has a deficit in employment land to meet its needs. It therefore relies on residual capacity and vacant premises on existing employment land. These sources of supply are covered in the Employment Land Supply Assessment (2023) evidence base document. The council's reliance on this as a source of supply is risky and possibly unsound since it is not considered to be core supply.

- 3.3.19. The council's approach to employment land also ignores its ongoing shortage of industrial premises. It's identified need covers the future; it does not account for the existing ongoing shortage of supply. The council should identify additional employment land so that it can overcome the current shortage, in addition to its future needs. The current and ongoing shortage in employment premises is pushing up rental levels and putting financial pressure on occupiers.

- 3.3.20. The council should also allocate more land to meet the identified demand for film studios and logistics premises. These occupiers often have unique particular requirements that are unlikely to be easily met on existing employment land.

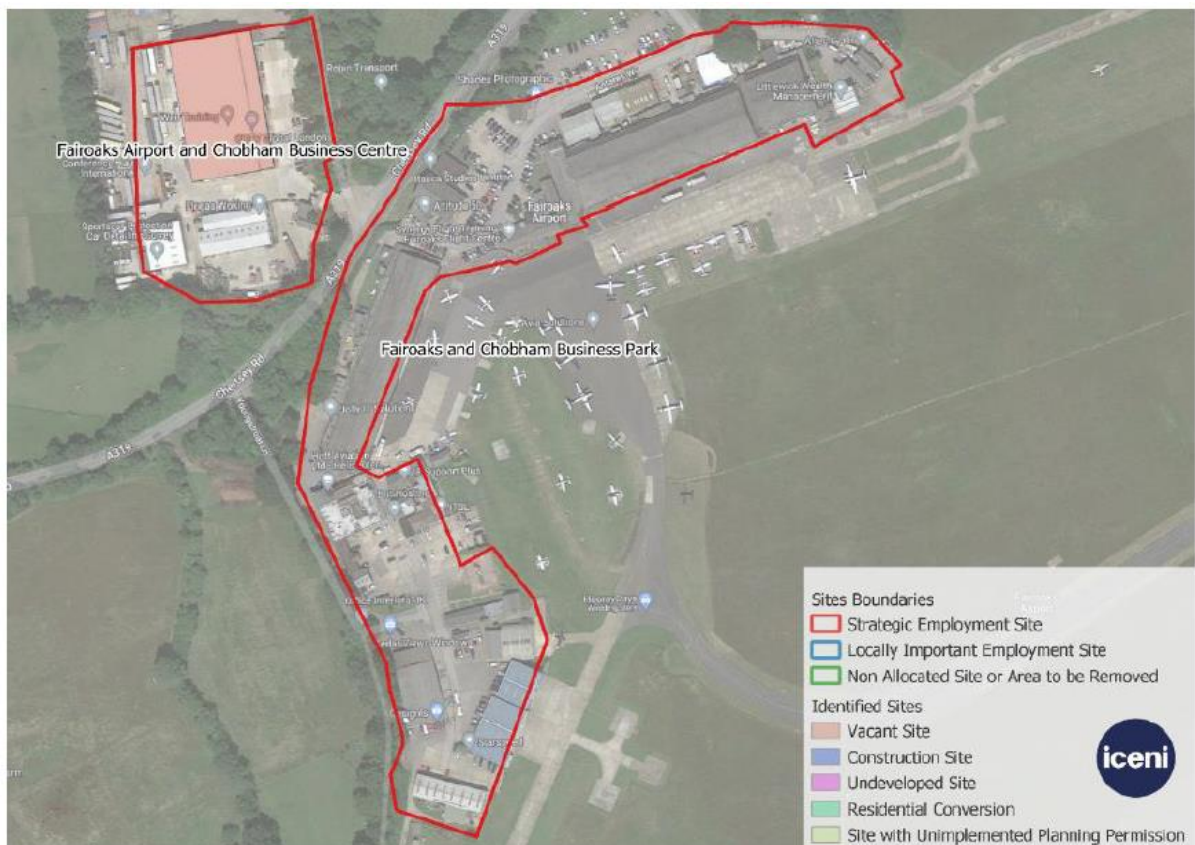
Employment Land Supply Assessment (ELSA) (2023)

- 3.3.21. The report reviews the council's existing employment land sites with the aim of identifying available supply of land and premises that could be new sources of future supply. Initially, the report identifies vacant and underutilised land on employment sites that have development potential. It then identifies vacant premises

on existing employment land which it says that in time, could be reused for other employment uses. The ELSA points out that these vacant properties do not form part of the council's core supply. However, in the ETP and ELTP the vacant properties are treated as part of the core supply. In other words, the council is relying on vacant floorspace within existing employment premises to demonstrate that it can meet its future identified employment land needs. This is a highly unusual approach.

- 3.3.22. The ELSA assesses 16 employment sites including what is called the Fairoaks Airport and Chobham Business Centre. The site includes a part of the site proposed in this report as well as the Chobham Business Centre which is outside of the purview of this report. The site is presented in **Figure 3.1**. Chobham Business Centre is located across the A309 Chertsey Road.
- 3.3.23. The assessment of the land and premises which are part of the Land at Fairoaks, describes it as a major developed site that is of low density and with units that are of poor quality but well occupied. It says the building stock needs redevelopment or upgrading.

Figure 3.1 Fairoaks Airport and Chobham Business Centre



Source: *Employment Land Supply Assessment (ELSA) (2023)*

- 3.3.24. The report estimates the capacity for future delivery of employment floorspace on all 16 of the existing employment sites and premises. It breaks down the capacity into two parts: (1) available land and (2) vacant premises.
- 3.3.25. The available land on existing employment sites comprises three sites although two of the three sites have

considerable barriers to delivery. Mytchett Place is in a remote location beyond the Green Belt. It contains a locally listed building, numerous Tree Preservation Orders, and sits within the buffer zone of a Special Protection Area. Given its setting, any new employment use is likely to be controversial and limited.

3.3.26. The other site is SC Johnson which would also be a challenge to redevelopment. It is an existing corporate campus that is owned and still partially occupied by a large corporate whose intentions and aspirations for the site are unknown.

3.3.27. The potential floorspace capacity from vacant units and premises assumes that most of the premises could achieve a change of use that would most likely be 'from office to industrial'. The assessments for these premises are high level and there is little certainty or clarity around how the sites could be used in the future. The sites in their current form are treated in the report as having the *potential* to be part of future supply but currently should not be considered as such. The report states about the sites:

'They may be subject to conversion or redevelopment to other uses. It could be to residential but equally to other employment-generating uses, at which stage it will form part of supply (page 120).'

3.3.28. Savills Observations

3.3.29. There is considerable uncertainty around how the vacant sites could be redeveloped to meet its current needs. It is a highly unusual approach for a local authority to rely on existing vacant employment premises to be a source of future employment floorspace supply through repurposing or redevelopment.

3.3.30. The paragraph quoted from the report in Paragraph 3.3.24 above demonstrates that the vacant premises on the sites should not currently be considered part of supply. And yet the council does so in order to demonstrate it has sufficient supply to meet its identified demand.

3.3.31. The council also assumes that the floorspace in the existing vacant premises could be used like-for-like with other uses, most likely industrial. However, a site with floorspace from a multi-storey office building is highly unlikely to be able to be redeveloped for the same amount of industrial floorspace. Industrial buildings are often single storey. The assumption that the total floorspace quantum from an office building could be retained for an industrial premises is flawed.

3.3.32. Finally, the council's approach does not recognise the loss of the vacant premises as a loss of employment floorspace. However, the actual impact of converting vacant existing premises to another use would result in only a limited net gain in employment floorspace.

4. Property Market Assessment

4.1. Introduction and Summary

4.1.1. This section revisits the property market assessment that was undertaken in 2022 (and which is included in the Appendix). The assessment uses the same property market areas (PMAs). The Local PMA is comprised of the local authority area. The Wider PMA is comprised of Surrey Heath, Woking Borough Council and Runnymede Borough Council.

4.1.2. The commentary in this section is focussed on identifying if there have been any significant changes in the property market since the 2022 report.

4.1.3. The 2022 report concluded that there was a considerable deficit in employment land and premises across the different property sectors. It was estimated that Surrey Heath needed to allocate at least 10 ha of new employment land to meet the needs of the local economy. If wider demand were considered, then the employment land requirement would be greater.

4.1.4. The assessment in this report finds that the shortage of land and premises for light industrial and industrial premises persists. However, the picture has changed for the office sector where demand has declined considerably. Surrey Heath development pipeline has some new projects but these comprise the redevelopment of existing employment land and premises and therefore adds little to overall employment floorspace inventory.

4.2. Supply Assessment Update

Ongoing Shortage of Industrial Premises Across the Wider PMA

4.2.1. **Table 4.1** presents an update on the supply in the Wider PMA across the three key employment property sectors. Whilst office vacancy has increased, the industrial sectors' already low vacancy rates declined further, and the provision of new supply continued to be insufficient to meet demand.

Table 4.1: Supply in Wider PMA

Market	Inventory	Vacancy Rate	New Supply (2009-YTD)	New Supply as % of Inventory (per annum)
Offices	9,302,537	11.5%	963,237	0.7%
Light Industrial	1,155,649	0.3%	26,136	0.1%
Industrial	7,294,069	4.5%	850,297	0.7%

Source: CoStar (2024), Savills (2024)

Supply Shortage Continues in Surrey Heath, Especially in the Eastern Part of the Borough

4.2.2. **Table 4.2** presents data for Surrey Heath. The light industrial and industrial markets continue to be supply constrained. Vacancy in the office sector increased.

Table 4.2: Supply in Local PMA Surrey Heath

Market	Inventory	Vacancy Rate	New Supply (2009-YTD)	New Supply as % of Inventory (per annum)
Offices	2,263,798	11.8%	42,394	0.7%
Light Industrial	316,278	0.0%	26,136	0.5%
Industrial	2,768,929	4.8%	275,999	0.6%

Source: CoStar (2024), Savills (2024)

4.2.3. There have been no new completions of industrial or light industrial premises since 2022.

4.2.4. **Table 4.3** presents the pipeline of projects in Surrey Heath. All new supply is redevelopment of existing premises. This means the new premises results in the loss of existing employment premises. The net increase in employment floorspace is likely to be limited.

Table 4.3 Anticipated Supply of New Employment Floorspace in Surrey Heath

Site / Address	Sector	Floorspace	Status	Anticipated Date of Completion
Frimley Business Park, Camberley	Light Industrial	90,000	Under Construction for the redevelopment of existing site for logistics	2024
Higham Park, Chertsey Road, Windlesham	Industrial (Manufacturing)	130,000	Under Construction for bespoke automotive manufacturing plant on exiting employment site	2024
Surrey Avenue, Camberley	Industrial	21,000	Under Construction for redevelopment of Compton Place Business Centre	2024
Watchmoor Park, Camberley	Industrial	316,000	Planning Permission for redevelopment of existing employment site.	2025

Source: Glenigans; CoStar (2024)

4.3. Demand

Demand Remains Steady Across the Industrial Sectors in Wider PMA Except for Offices

4.3.1. **Table 4.4** sets out the high-level metrics of demand in the Wider PMA. It shows relatively steady demand for industrial premises. Performance of offices has declined since the 2022 report.

Table 4.4 Demand in Wider PMA

Sector	Inventory (sqft)	Total Net Absorption (2009 - Present) (sqft)	Average Net Absorption Per Annum (2009 - Present) (sqft)	Annual Net Absorption as % of Total Inventory	Market Rent (£ per sqft)
Offices	9,302,537	-356,860	-22,658	-0.2%	£29.68
Light Industrial	1,155,649	71,347	4,530	0.4%	£16.75
Industrial	7,294,069	625,560	39,718	0.5%	£16.28

Source: CoStar (2024)

Surrey Heath Maintains Healthy Demand for Light Industrial/Industrial; Offices Declined

4.3.2. Demand in the Local PMA Surrey Heath is presented in **Table 4.5**. Demand has remained particularly strong in the light industrial sector and steady in the industrial sector since 2022. Demand in the office sector turned negative.

Table 4.5 Demand – Local PMA – Surrey Heath

Sector	Inventory (sqft)	Total Net Absorption (2009 - Present) (sqft)	Average Net Absorption Per Annum (2009 - Present) (sqft)	Annual Net Absorption as % of Total Inventory	Market Rent (£ per sqft)
Offices	2,263,798	-267,160	-16,963	-0.7%	£21.40
Light Industrial	316,278	79,448	5,044	1.6%	£15.06*
Industrial	2,768,929	162,052	10,128	0.4%	£16.04

Source: CoStar (2024)

5. The Case for Extending Land at Fairoaks

5.1. Introduction and Summary

- 5.1.1. This section summarises the justification to extension of the Land at Fairoaks. The footprint of the existing estate is about 3.6 ha and in the Reg 19 plan is proposed to be a Strategic Employment Site. However, there is a need in Surrey Heath for more employment land and therefore the employment site should be expanded to 14.5 ha and removed from the Green Belt. There are several reasons why Land at Fairoaks should be expanded which are set out below.

Expanding Land at Fairoaks to 14.5 ha Would Create More Economic and Placemaking Opportunities and Enable the Site to Fulfil its Role as a Strategic, Sub-Regional Driver of Growth

- 5.1.2. The proposed site in the emerging local plan, whilst now proposed to be a SES, is too narrow and awkwardly shaped to provide the scale that would enable a more commercially attractive employment location that could expand an already dynamic employment cluster. The expanded site, removed from the Green Belt, would also establish a more viable employment cluster in the east part of the borough which lacks the dynamism around Camberley. A larger site would also enable greater amenity; additional opportunities for synergies between various businesses; the flexibility to ensure existing businesses are retained; and enable placemaking. As a proposed SES whose role is to provide capacity within the FEA and is, by definition, aligned with economic development priority areas, an expanded site would surely bring both local and sub-regional benefits.

There is an Ongoing Shortage of Employment Land that is Not Addressed in the Reg 19 Plan

- 5.1.3. Both the evidence base documents (ELTP) and our own property market assessment identify a shortage of employment premises in Surrey Heath. The borough's industrial sectors are characterised by low vacancy and virtually no available units in its eastern half. The Reg 19 Plan is oriented towards meeting need over the plan period and not towards addressing the ongoing historic shortage. An expanded Land at Fairoaks would provide the council with an additional 11 ha of sustainably located new employment land that would increase the likelihood of meeting the economic needs of the Borough.

Council Relies Entirely on Existing Employment Land to Meet Its Need; More Sites Are Needed

- 5.1.4. The Reg 19 plan allocate no new employment land. It relies solely on existing employment land. It assumes that some sites and premises can simply be substituted with new or repurposed premises and deliver the same amount of floorspace. This is unrealistic. It assumes that existing land is commercially attractive for other uses. This may be the case in some instances but certainly not in all. Different sectors have different locational requirements and seek different operational environments. In addition, two of the three sites with development capacity have considerable barriers to bringing them forward for development.

Council's Use of Vacant Premises as Part of Its Future Supply is Unusual and Possibly Unsound

- 5.1.5. The supply of vacant premises is characterised in the ELSA as not part of the council's core supply. It says that the sites have the *potential* to be part of future supply but should not currently be part of supply. However, the ETP treats this as a core part of its supply, providing the council with over 37% of its identified supply (41,000 sqm). It is likely that much of the redeveloped vacant premises won't end up providing the same amount of floorspace as what is currently there. Also, the redevelopment of existing vacant premise

represents a loss of existing premises as well as a gain of new premises. The net change in floorspace could be *de minimus*. Without these vacant premises that are not meant to be part of its core supply, the council has a considerable shortfall in employment floorspace.

The Council's Evidence Identifies Demand for Film Studios and Logistics; These Sectors Require New Sites

- 5.1.6. Unlike the evidence base and earlier version of the emerging local plan, the updated evidence base recognises the importance of film studios and logistics as important drivers of growth in the area. These uses should be accommodated by a combination of existing and new sites.

**Appendix – REPRESENTATIONS TO DRAFT SURREY HEATH LOCAL
PLAN PREFERRED OPTIONS (2019-2038) Employment Market Assessment**

Land at Fairoaks

REPRESENTATIONS TO DRAFT SURREY
HEATH LOCAL PLAN PREFERRED OPTIONS
(2019-2038)

Employment Market Assessment

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Executive Summary

ADP Fairoaks Ltd and Countryside Properties (UK) Ltd are promoting Land at Fairoaks which extends the draft Local Plan's employment land designation at Fairoaks Airport by approximately 7.4 hectares.

Land at Fairoaks Would Expand and Improve Upon the Proposed Draft Plan Designation

This representation argues for the draft Local Plan's designation of the 3.7 ha Fairoaks Airport employment site (excluding the Chobham Business Centre across the A319) to be:

- Expanded to about 11 ha;
- Changed from a proposed Locally Important Employment Site (LIES) to a Strategic Employment Site (SES); and
- taken out of the Green Belt.

The draft Local Plan's proposal for the Fairoaks Airport employment site offers a narrow, awkwardly shaped land strip that curbs the expansion of the employment cluster and curtails the opportunity to increase its commercial attractiveness and promote placemaking.

Land at Fairoaks Could Address the Immediate and Longer-Term Need for Premises, Especially in the East of the Borough

The proposed Land at Fairoaks would provide the Council with the opportunity to address the current acute shortage of employment premises in the Borough, especially in its eastern half of the Borough where there are currently no available office, light industrial or industrial premises.

Land at Fairoaks would also contribute to meeting the Council's longer-term local employment land needs. This representation's Chapter 4 Property Market Assessment estimates a need for an additional 10 ha of employment land to meet the needs of its local economy. (This is consistent with the Council's own evidence base.) An additional 7.4 ha that would be provided by extending the draft Local Plan's Fairoaks Airport site would help meet the identified need.

The Council's Evidence Base Does Not Accurately Characterise the Diversity and Scale of the Economic Activity at Fairoaks Airport

The Council's site assessment of Fairoaks Airport does not accurately reflect the diversity and scale of the employment activity at the site. It concludes that economic activity is almost entirely aviation-related and gives the impression that the tenants are dependent upon the airport facilities. However the tenancy base at Fairoaks Airport has shifted from aviation-related occupiers to a far more diverse range of businesses which draws workers from across the region. This includes studio/film production, professional services, IT consultancy, food/catering, engineering, creative/arts, medical and others.

Today the companies at Fairoaks Airport range from locally-based SMEs and start-ups to large multinational corporations such as Apple and Netflix. In spite of the poor condition of the current premises, there continues to be strong demand for space due to the commercially attractive location, the variety of different types of employment premises and its good access to the strategic road network and to Greater London. Approximately 450 workers

currently work at the site with about 370 being full-time. Only a small proportion of the workforce is in the aviation sector. An expansion of employment land would build upon an already vital employment cluster and meet floorspace demand that is currently unmet.

It is Unrealistic for the Council to Meet Its Employment Land Needs Solely through the Redevelopment of Existing Employment Land – New Employment Land is Required

Both the Council's evidence base and Savills' own analysis identify a need for 10 ha of employment land to accommodate the anticipated economic growth within the Borough. (If the wider economic needs of the wider area and Greater London were considered, the need would be greater.) The Council assumes that its requirement can be met by the redevelopment of existing employment sites and therefore provides no new employment land in its draft Local Plan. This is unrealistic because it is unknown whether and when any existing employment land will become available and whether manufacturing, which the Council's evidence expects the employment land need to decline, can be substituted with other uses such as offices, warehousing or more specialist activities such as studio/film production. The Council requires a greater employment land buffer that ensures sufficient capacity to meet the identified need.

Land at Fairoaks Should be Designated a Strategic Employment Site Given Its Size and Importance

The proposed Land at Fairoaks should be designated an SES because it has the scale, strategic location and economic influence that warrants the designation. The Council's own site assessment acknowledges that the site is already meeting economic needs beyond its own boundary. The average site size of the draft Local Plan's proposed SESs is 9.6 ha whilst the average size of a LIES is just 2.9 ha. At about 11 ha, Land at Fairoaks would have the scale and breadth of economic activity to justify an SES designation.

The Shortage of Employment Premises is Currently Limiting the Borough's Economic Potential – There Is An Immediate Need for New Employment Land

The property market assessment undertaken in Chapter 4 of this representation identifies low property market vacancy, strong floorspace demand and a limited supply response. This is resulting in potential occupiers at Fairoaks Airport and the wider Borough having to seek premises elsewhere and limiting the Borough's overall economic growth potential.

There is an immediate need to make new employment land available instead of having to wait until occupiers in existing employment premises vacate their premises so that redevelopment can take place. Based on historic performance in the Borough, demand of employment premises is strong. Given the limited supply, the designation of an expanded employment land cluster in the form of Land at Fairoaks would address the economy's immediate need.

1. Introduction

1.1. Overview and Summary

1.1.1. This representation is made on behalf of ADP Fairoaks Ltd and Countryside Properties (UK) Ltd to Surrey Heath Borough Council ('Surrey Heath') in support of a proposed employment development at Land at Fairoaks.

1.1.2. The analysis in this representation finds that the current proposed designation for employment land at Fairoaks Airport does not optimise the site's potential nor does it address the acute shortage of employment land in the Borough. It argues that the proposed Land at Fairoaks employment site should:

- Extend beyond the emerging Local Plan's allocation;
- Designated a Strategic Employment Site; and
- Removed from the Green Belt to maximise the site's economic potential.

1.2. Methodology

1.2.1. To inform the findings in this representation the following analysis has been undertaken:

- Review of the existing and draft Local Plan policies, the employment land evidence base and other relevant documents;
- Identification of the relevant property market areas (PMAs) and analysis of the property market dynamics for the offices (Use Class E(g)(i)), light industrial (Use Class E(g)(iii)) and industrial (Use Class B2/B8) sectors;
- Forecast of future demand for employment land in the Local PMA across the three sectors including an estimate of suppressed demand;
- Review of the supply picture in the Local PMA now and over the next few years; and a
- Gap analysis that compares demand with supply; and
- Conclusions are drawn about the Council's evidence base and policies and the role that Land at Fairoaks in addressing the economic needs of the area.

1.3. Structure

1.3.1. The chapters of the report are:

- **Chapter 1 – Introduction**
- **Chapter 2 – Existing Site and Proposed Development** which includes a description of the site, its connectivity to the wider market via strategic transport connections, its current use and options for the proposed development.
- **Chapter 3 – Policy and Evidence Base Context** which summarises the draft planning policies currently undergoing consultation and its evidence base being used to inform the draft Local Plan.
- **Chapter 4 – Property Market Assessment** summarises the relevant property market dynamics in the identified property market area (PMA) within which Fairoaks Airport is located.
- **Chapter 5 – The Case for Land at Fairoaks; Observations of Evidence Base / Market Assessment**

2. Existing Site and Proposed Development

2.1. Introduction and Summary

- 2.1.1. This chapter presents the Land at Fairoaks, its historic and current uses, and the proposed Site. The Site extends the proposed employment area in the draft Local Plan to about 11 ha. This provides room for the existing employment cluster to expand, greater spatial flexibility for a variety of new employment premises and sectors, and the facilitation of placemaking.
- 2.1.2. The key features of the Site are its considerable scale, diversity of the existing economic base and proximity to strategic highways (including M25 and M3) which provide good links in to and around Greater London.

2.2. Site and Existing Uses

- 2.2.1. **Figure 2.1** presents a site plan of Land at Fairoaks (shown within the redline boundary which extends to approximately 11 ha). The Site is in the Green Belt and comprises existing employment premises and open land linked to Fairoaks Airport. The proposed employment land designation in the draft Local Plan is shown in light purple and is about 3.6 ha. Land at Fairoaks would extend land in the draft Local Plan by about 7.4 ha.

Figure 2.1: Land at Fairoaks Site Plan

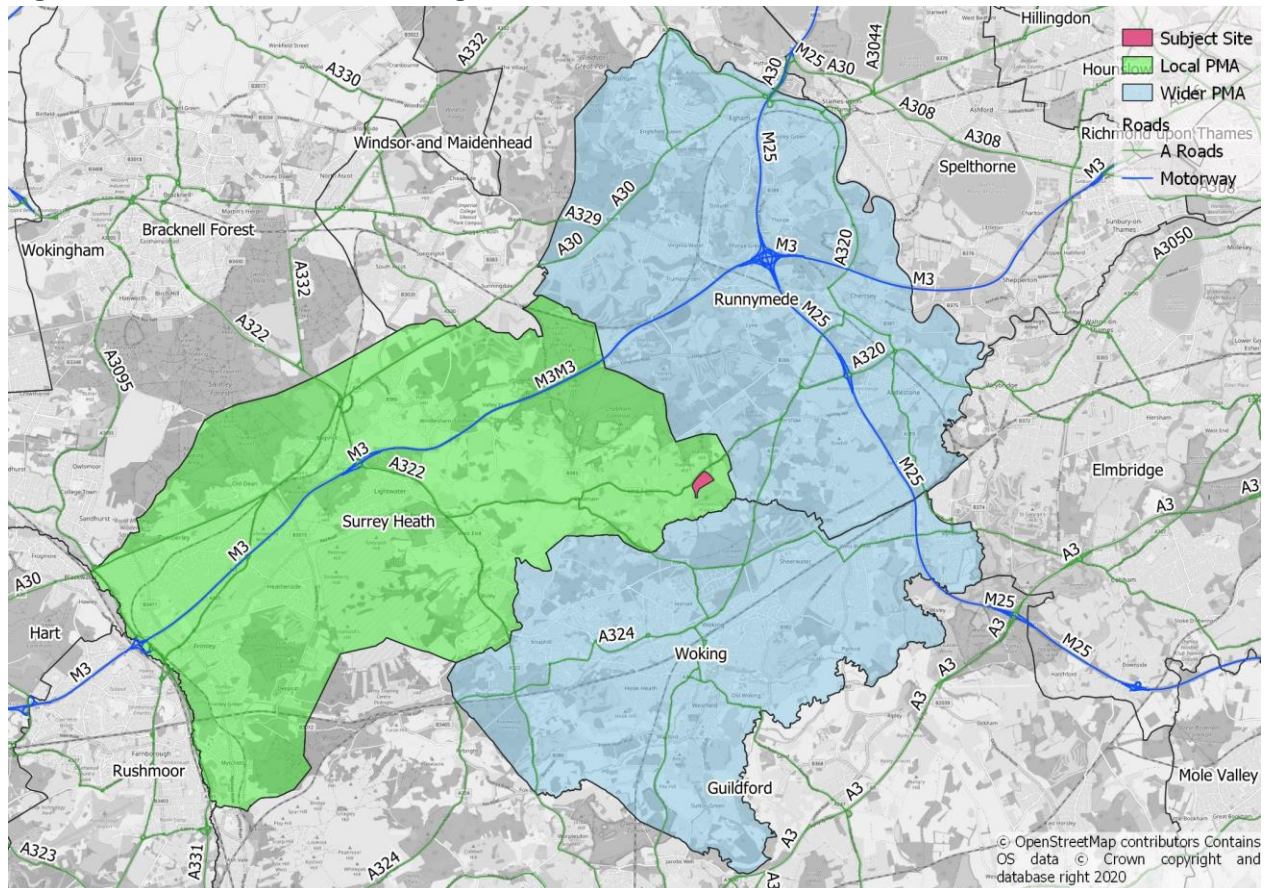


Source: Terrence O'Rourke Ltd (2022)

2.2.2. The proposed site in the draft Local Plan, whilst having succeeded in attracting a range of dynamic businesses, is narrow and does not provide sufficient scope to create a more commercially attractive employment proposition that could expand what is already a critical mass of economic activity. The proposed Land at Fairoaks would provide Fairoaks Airport with the scope and capacity to establish a more commercially attractive and viable employment cluster in the east of the Borough. A larger site would enable provision of greater amenity: more opportunities to create synergies between the various businesses; sufficient scale to decant and help retain any existing businesses who may wish to remain on the site through re-development; and enable placemaking.

2.2.3. **Figure 2.2** shows the Site in its spatial context. It is strategically located close to two motorways. It is a 6-minute drive to J11 on the M25 and a 10-minute drive to J3 on the M3. The Site's location provides good access to Greater London, the wider South East and the South West. It is also less than 2 miles north of Woking rail station which provides frequent rail connections to London.

Figure 2.2: Land at Fairoaks' Strategic Context



Source: Savills (2022)

2.2.4. Historically Fairoaks Airport serviced commercial and private planes and the employment premises were related to aviation. However, the operations of the airport have reduced and only two of the current 72 tenants make use of the airport facilities which comprise the runway and aerodrome. Even most of the existing on-site aviation-related uses do not make use of the airport facilities.

2.2.5. The tenancy base at Fairoaks Airport has changed significantly in recent years away from primarily aviation-related occupiers to a range of sectors that draw workers from across Greater London. This includes studio/film production, 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 such companies as Apple and Netflix. In spite of 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. **Table 2.1** sets out the different employment sectors that occupy premises at Fairoaks Airport.

Table 2.1 Current Occupancy of the Premises

Employment Sector	Total Sqft Occupied	Number of Units	Tenants
Studio/Media	49,790	14	Itasca Studios (Apple, Paramount or Netflix)
Aviation	20,695	17	Synergy, GRB Aviation, Airline Experience Ltd, Recovair Ltd, Hoff Aviation, Flight Safety Committee, British Helicopter Association, Turnex Tools, Adventure 001, StarSpeed, MRO Exhibition Services, Fairoaks Gyros Ltd, Avia Solutions
Auto-related	12,979	8	Surrey Car Craft UK, Autoplate (UK) Limited, Daniel Stewart T/A DAS Autos, J H Pearce & Co, Alan Mann Racing Limited, James Dover, R & S Recovery Ltd, Design LS
Professional services	7,673	13	CMC Property Partnership, L E Marshall, ERA Developments, Jane West and Eleanor West, JCA Associates Ltd, Rt. Hon. The Lord Trefgarne, Alchemy, Opads Ltd, Ashley Homes, Raymond Burrell Associates, Fairoaks Recovery, Alistair Mann
Retail/Wholesale	5,734	5	Cathay Industries (UK) Ltd, Khyani Ltd, That Perfect Party Company Ltd, Cedar Designs
IT	3,977	8	Cyber Orchestration, Cleverwoof, James Dover, IT Support Plus, Jolly IT Solutions Ltd, OrbitTech Ltd, Integrated Technology Solutions Ltd, Planet Earthed Ltd
Food/Catering	2,090	2	Hangar Café Ltd, Fairoak Foods Ltd
Creative / Arts	1,584	6	Shades Photographic, Emerald Media, Szabo Limited, Office Interiors D & B UK LLP, Colourbox Signs
Engineering	1,441	4	PSF Structural Engineering, BMS Controls, Deker Limited, EDP Environmental
Personal Services	820	3	Just Ask Services Ltd, Site office
Storage	577	3	Patrick Stanbury
Medical	466	1	Radvance, Reliance Ambulance Service
Total	108,635	84	

Source: Savills, 2022

- 2.2.6. **Table 2.2** presents estimates of on-site employment by employment sector. The total number of employees 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, aviation, engineering and IT. This demonstrates that there is a diversity of jobs from high-value professional employment to lower skilled services jobs. The cluster of aviation-related activity still represents a significant proportion of the occupancy base and is 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.

Table 2.2 Estimated Jobs by Employment Sector

Employment Sector	Estimated Full Time Employment	Estimated Total Employment
Studio/Media	170	230
Professional services	50	55
Aviation	40	50
Engineering	40	40
IT	30	35
Food/Catering	8	15
Auto-related	10	10
Creative / Arts	8	9
Business Services	5	5
Medical	2	2
Personal Services	2	2
Retail/Wholesale	2	2
Storage	1	1
Total	367	455

Source: ADP Fairoaks Ltd (2022)

2.3. Proposed Employment Land

- 2.3.1. The proposed 11 ha employment land area for Land at Fairoaks is intended to provide an extended and upgraded range of employment premises that would form an expanded, commercially attractive cluster to support the economic needs of both Surrey Health and in the wider market area. The proposal would strengthen the existing diverse business ecosystem, create and draw in additional economic activity and re-enforce an emergent economic driver for the eastern part of the Borough and wider area.
- 2.3.2. If the 11 ha were redeveloped for a range of uses with a site coverage ratio of 0.50 to 0.60 (to reflect a mix

Land at Fairoaks

Employment Market Assessment



of premises that could include multi-storey offices), Land at Fairoaks could accommodate between 500,000 and 600,000 sqft of new, high-quality premises.

3. Policy and Evidence Base Context

3.1. Introduction and Summary

- 3.1.1. This section reviews relevant policy and related evidence base documents including Surrey Heath's employment land policies and the Local Plan evidence base.
- 3.1.2. The current Development Plan is the Core Strategy and Development Management Policies Development Plan Document (2012), alongside the Local Plan 2000 'Saved Policies'. SHBC is currently preparing a new Local Plan that would supersede the current Core Strategy and Local Plan. The Regulation 18 Draft Surrey Heath Local Plan: Preferred Options (2019-2038) is the most recent version of the emerging Plan. The Regulation 19 version is due to be released in 2023.
- 3.1.3. The latest available assessment of employment land in Surrey Heath is the GL Hearn Employment Land Technical Paper Update 2019 (2020).

3.2. Policy Context

Local Plan 2000 'Saved Policies'

- 3.2.1. The Local Plan 2000 was adopted in 2000. It was superseded by the current Local Plan which is covered below.
- 3.2.2. The Local Plan 2000 contained Policy M21: Development at Fairoaks Airport which is a saved policy in the current Local Plan. The Local Plan policy recognises Fairoaks Airport as a Major Developed Site. The policy said Fairoaks Airport has limited potential for development of business aviation facilities and that any development should not have significant impacts on the Green Belt or the existing premises' footprint or building heights.

Core Strategy and Development Management Policies 2011-2028 (2012)

- 3.2.3. The document was adopted in February 2012 and incorporated saved Policy M21 from the Local Plan 2000.
- 3.2.4. Policy CP1: Spatial Strategy says that any change to the boundaries of an MDS will be considered through the site allocations DPD.
- 3.2.5. Paragraph 5.91 states that the airport's role as a provider of business aviation services and an important local employer will be supported. It also states that there is an expectation that the future development needs of the airport are to be addressed through an airport masterplan to support its identification as an MDS within the Green Belt.

Draft Surrey Heath Local Plan: Preferred Options (2019-2038) Regulation 18

- 3.2.6. The representation responds to the Draft Surrey Heath Local Plan 2019-2038 Regulation 18 document. This section reviews the draft policies relevant to Land at Fairoaks.
- 3.2.7. Paragraph 4.40 states that Surrey Heath is characterised by a buoyant economy with a diverse economic base. Strong sectors include:

- Engineering and manufacturing;
- medical technology,
- information technology (IT);
- financial /businesses services;
- logistics / distribution; and
- health.

3.2.8. Paragraph 4.46 states that the evidence base has found there were net losses in offices and industrial floorspace in the Borough. It notes that maintaining a supply of employment land is essential for the economy.

3.2.9. Paragraph 4.49 says that the employment land requirement ranges from an allowable net loss of 1.34ha to a need for 18.5ha. However the relevant evidence base documents reviewed later in this chapter conclude that all employment land requirements can be met from the existing employment land supply. This representation argues that the conclusion in the evidence base is unrealistic.

Draft Policy ER1: Economic Growth and Investment

3.2.10. The policy emphasises the growth and retention of existing businesses and inward investment. Sites that are identified as Strategic Employment Sites and/or Locally Important Employment Sites for Employment Use should be protected and enabled for regeneration/redevelopment. (The proposed designation for Land at Fairoaks is a Locally Important Employment Site.)

3.2.11. The policy seeks to encourage the growth of small and micro businesses by protecting employment units capable for use by a small business or industry and supporting the siting of small to medium size employment units in Strategic and Locally Important Employment sites.

3.2.12. The policy also supports and encourages any opportunity to develop key employment sectors including medical technology, specialist/advanced manufacturing, logistics and distribution, information technology and financial and business services.

3.2.13. The narrative which accompanies the policy says that proposals outside of defined employment sites will be supported provided they are appropriately located and appropriate to their surroundings in size and scale. This shows that the emerging Local Plan could support the extension of employment development beyond its boundary if deemed appropriate. This is consistent with the proposal for Land at Fairoaks.

Draft Policy ER2: Strategic Employment Sites

3.2.14. The policy identifies sites designated as Strategic Employment Sites (SES). The sites are predominantly located in the West of the Borough and generally cater to large to medium sized and industrial parks with a significant number of occupiers ranging from multinational companies to small and medium enterprises, and local businesses.

3.2.15. As it currently stands, the Land at Fairoaks is not identified as a Strategy Employment Site. This representation argues that it should be because it has the scale and diversity of employment and economic

activity that is reflective of an SES.

- 3.2.16. The policy states that the redevelopment and regeneration of SESs will be supported to provide employment floorspace that meets the needs of the future economic growth needs of Surrey Heath and the Functional Economic Area (FEA). (The FEA is defined as Surrey Heath, Hart District Council and Rushmoor Borough Council.)
- 3.2.17. Paragraph 4.62 states that these SESs are identified in the Employment Technical Paper Update 2019 which is summarised below. SESs are larger than 1.5 hectares and fulfil a strategic function within the Surrey Heath FEA.
- 3.2.18. Land at Fairoaks performs a similarly strategic role as the emerging Plan's SESs. This representation argues that the subject site should be designated an SES because of its size and the scale and diversity of its employment and economic activity.

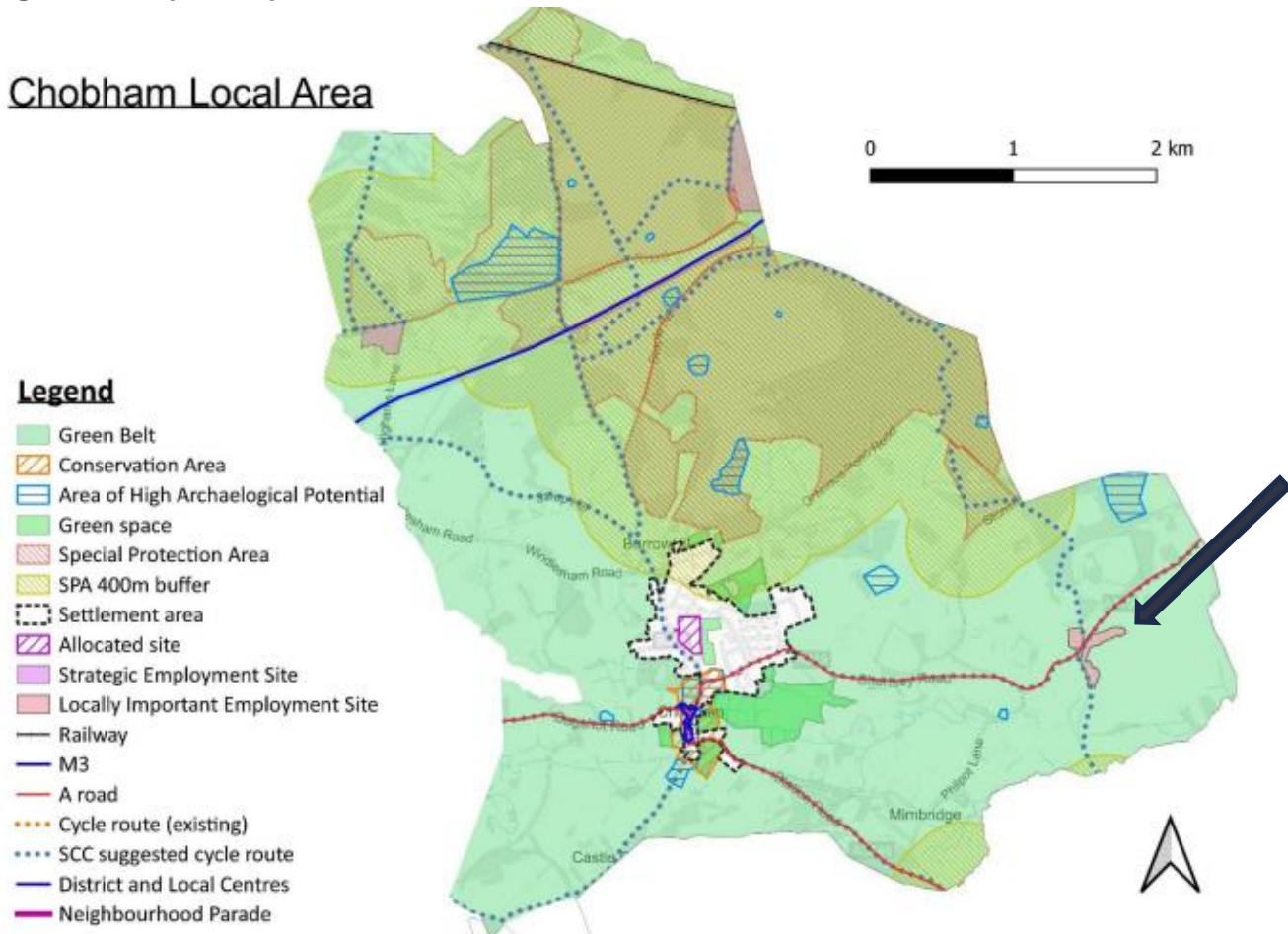
Draft Policy ER3: Locally Important Employment Sites

- 3.2.19. The draft policy identifies Locally Important Employment Sites (LIES) which are generally smaller than SESs and they are recognised for their role in driving the local economy and wider FEA. Part of Land at Fairoaks is designated a LIES. The redevelopment and regeneration of LIES will be supported to meet the needs of the market. The LIES are identified in the Employment Technical Paper Update (2019) and are larger than 0.3ha.
- 3.2.20. Paragraph 4.70 notes that the regeneration and intensification of existing employment sites will be supported to allow businesses to expand and enable the provision of modern employment stock to replace properties that have, or are reaching, the end of their functional economic life.

Chobham Local Area

- 3.2.21. Paragraph 9.88 covers Fairoaks Airport which it states is close to Runnymede and Woking Boroughs and is proposed as a Locally Important Employment Site. It identifies the site as an established airport and home to a number of businesses, including commercial employers, associated with the general aviation industry. However, employment at Fairoaks Airport is vastly more diverse than suggested in the description.
- 3.2.22. **Figure 3.1** is taken from the emerging Local Plan and presents the proposed Chobham Local Area designations. The proposed designated LIES is identified by the black arrow.

Figure 3.1: Map of Proposed Chobham Local Area



Source: Draft Surrey Heath Local Plan – Preferred Options (2019 – 2038)

3.3. Evidence Base

3.3.1. **Hart, Rushmoor and Surrey Heath Joint Employment Land Review (Joint ELR) (2015)**

- 3.3.2. The Joint ELR was undertaken in 2015. A more recent assessment of supply and demand has been undertaken and therefore the conclusions of this ELR are not summarised.
- 3.3.3. The Joint ELR includes a site assessment of Fairoaks Airport. It notes the dated building stock that needs refurbishment. However, the occupancy rate was high. It noted a number of aviation related occupiers and said that they align with the FEA's growth sectors. It also noted a cluster of SMEs that contain uses unrelated to the airport. It also noted that any future development would be limited due to the tightly drawn boundary.

A Strategic Economic Plan for the Enterprise M3 Area 2018–2030 (2018)

- 3.3.4. Enterprise M3's SEP sets out an ambitious vision and target for the area of GVA growth of 4% per annum. The paper seeks to establish a strategy to achieve this ambition.
- 3.3.5. The paper identified digital innovation in a low-carbon economy is a strength in the area and represents an

opportunity to drive economic growth in the area and benefit the wider area.

3.3.6. It states that the LEP area has a high concentration of knowledge-based industries, with four key priority sectors:

- Aerospace and Defence,
- ICT and Digital Media,
- Pharmaceuticals and
- Professional and Business Services.

Employment Land Technical Paper Update 2019 (ELTP) (2020)

Overall Characterisation of Employment Market

3.3.7. The ELTP is the key employment land evidence document used to support the emerging Local Plan's employment land policies.

3.3.8. The report portrays a robust local economy that, in spite of the economic crisis in 2008, has generated over 6,000 additional jobs between 2009. A SWOT analysis of the Borough noted these findings relevant to employment land.

- Strong employment growth;
- A diverse business base;
- Good access to the M3 and London; and
- A relatively high out commuting of higher skilled / higher paid residents.

3.3.9. The report notes that since 2009 there was a net loss of about 22,000 sqm of office floorspace; a 5,000 sqm net loss in manufacturing floorspace; and a modest net gain of about 7,000 sqm of distribution floorspace (p.78). There were mixed/flexible net completions. Overall there was a modest increase in floorspace.

3.3.10. At the time of the report, Surrey Health had an office vacancy rate of just 2% and an industrial vacancy rate of less than 1%.

Office Market Summary (2019)

3.3.11. Surrey Health has a considerably lower office stock compared to the other local authorities in the FEA. Since 2001 its office stock has declined. Much of the loss has arisen due to permitted development (p.58).

3.3.12. Consultations with agents reveal offices in Surrey Heath are in demand but that the local authority isn't capturing that demand because of the lack of available supply (p.62). In addition, the Borough's office parks do not have enough space and are mostly at capacity (p.63). The analysis of supply and demand of floorspace concludes that the Borough has just 2.3 years' supply of offices (p.62).

Industrial Market Summary (2019)

- 3.3.13. Surrey Heath's supply of industrial premises has remained relatively stable since 2001 (p.64). The analysis of supply and demand of floorspace concludes that Surrey Heath has just 1.06 years' supply of industrial floorspace (p.68).

Employment Land Supply Position (2019)

- 3.3.14. In terms of the supply of employment land, the report indicated that as of March 2019 there was a net supply of about -0.2 ha based on available sites and extant planning permissions (p.56). This figure is comprised of remaining developable land on allocated employment sites (2.6 ha) less extant planning permissions (-4.5 ha) and planning permissions under construction (1.7 ha) (p.86).

Employment Land Demand Forecasts (2019)

- 3.3.15. The report uses three approaches for estimating employment land need in Surrey Heath: (1) labour demand, (2) labour supply and (3) past trends.
- 3.3.16. The labour demand scenario is based on forecasted job growth and the amount of floorspace and land that is required to accommodate those jobs. The labour supply scenario is derived from the forecasted housing requirements/forecasted population for Surrey Heath and the anticipated new economically active residents. The past development rates is based on historic completions.
- 3.3.17. **Table 3.1** presents the employment land requirements across the three of scenarios.

Table 3.1 Employment Land Demand Scenarios and Report Conclusions (2019-2037)

Use Class	
B1a/b	The range is 3.9 ha to 10.3 ha. A midpoint of 6 to 7 ha may be suitable to meet needs.
B1c/B2	The range is -13.5 ha to 6.2 ha. This suggests that whilst there is a need for new industrial floorspace this should be able to be accommodated on existing sites.
B8	The range is 0.1 ha to 5.0 ha. Planning for a mid point of around 3ha may be appropriate.
Total	The range is -2.8 ha to 15.9 ha. Planning for around 10ha is considered appropriate.

Source: *Employment Land Technical Paper Update 2019 (ELTP) (2020)*

Balance of Supply and Demand for Employment Land (2019)

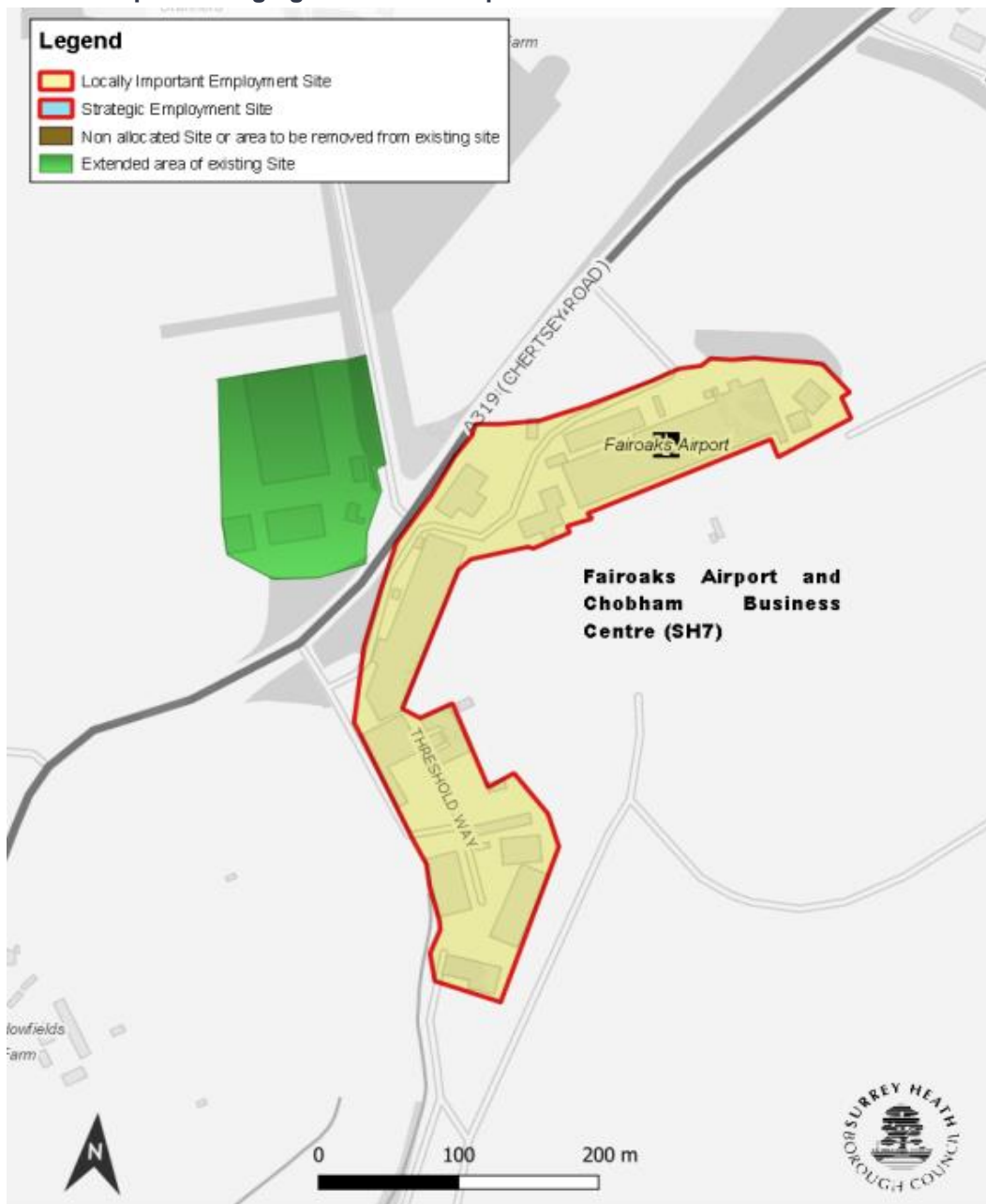
- 3.3.18. In the chapter on the supply-demand balance, the analysis makes a range of additional adjustments that results in a supply-demand balance of between -8.2 ha and 12.2 ha over the period 2019 to 2037.
- 3.3.19. The report concludes that the labour demand scenario and the labour supply scenarios suggest that demand can be met through existing supply. This is primarily due to a decline in demand for land and floorspace for manufacturing (B2) as shown in **Table 3.1**. The past trends scenario suggests an undersupply of land but concludes that patterns of use and economic structure will allow for a recycling of land. Therefore in all cases the analysis suggests that no further employment land need be allocated in

order to meet the needs of the economy.

Employment Land Technical Paper Update 2019 Appendix B: Employment Site Assessments (ELTP Appendix B) (2020)

- 3.3.20. The employment site assessments in Appendix B provides an assessment of the sites that are proposed as SES and LIES. This includes SH7 which is the proposed employment land allocation of Fairoaks Airport. (This is the Emerging Locally Important Employment Site shown in **Figure 2.1** and presented below as **Figure 3.2** from ELTP Appendix B.)

Figure 3.2 Fairoaks Airport Emerging Local Plan Proposed Allocation



Source: ELTP Appendix B (2020)

3.3.21. According to the site assessment, the Fairoaks Airport site comprises 7.1 ha (including the land at Chobham and is characterised as having potential to deliver new/upgraded uses. It is described as having a range of uses associated with the aviation sector. This includes:

- Aircraft hangars
- Specialist aviation
- Avionics engineering
- Maintenance enterprises
- Aircraft leasing charter companies
- Headquarters of aviation authorities

3.3.22. The site assessment also states that it accommodates industrial, storage and office based companies which are not directly related to the aviation activities at Fairoaks. It also has a restaurant/café, gym/sports facilities and a training facility.

3.3.23. The assessment notes that the building stock is dated and in need of refurbishment but that it is well-occupied and fully let. It notes that the aviation and specialist engineering uses align with the FEA's core growth sectors.

3.3.24. Despite the site assessment being undertaken in 2020 it fails to identify the current vibrancy and diversity of the business base.

4. Property Market Assessment

4.1. Introduction and Summary

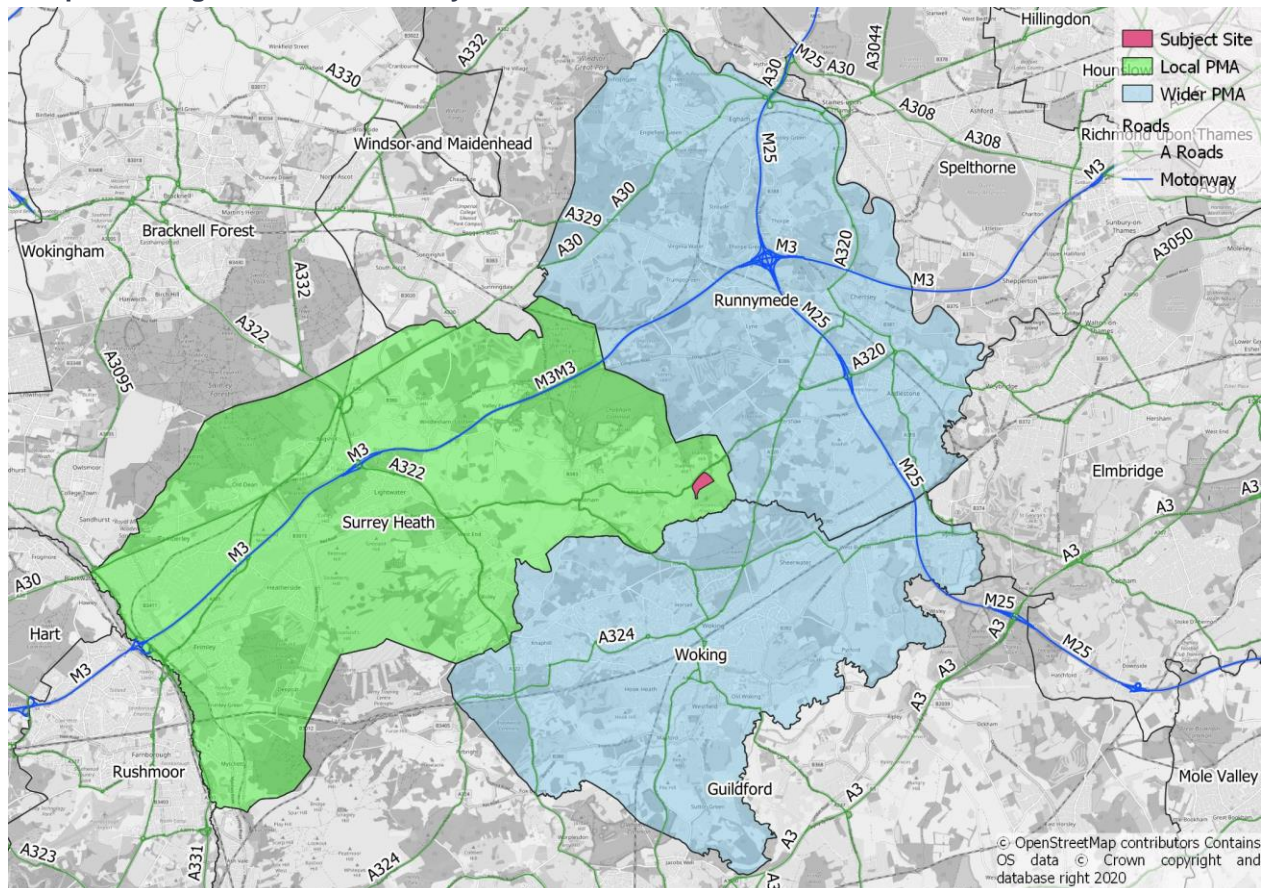
- 4.1.1. This section assesses the property market dynamics in the property market area (PMA) within which Land at Fairoaks is located. PMAs represent the area of search within which an occupier looks for suitable, commercially attractive premises.
- 4.1.2. This chapter first defines the PMAs. It then assesses historic, current and future supply and demand dynamics across offices, light industrial and industrial premises. Finally, it compares the future balance of supply and demand for the three sectors over the draft plan period to 2037.
- 4.1.3. The analysis assesses both a Local PMA - Surrey Heath and a Wider PMA (including Woking Borough Council and Runnymede Borough Council).
- 4.1.4. The analysis identifies an overall shortage of employment floorspace across the Wider PMA but that the shortage is most acute in the Local PMA – Surrey Heath. A CoStar map of the Borough shows that there is virtually no availability of any employment premises in the eastern half and that most availability is in the western part of the Borough by Camberley and Frimley. The Borough's shortage of employment premises is especially acute in the office sector. The quality of the premises in most of the Borough is either average or below average; there are very few high quality premises. Whilst there is some floorspace coming forward through the development pipeline, it is all located in the western part of the Borough.
- 4.1.5. With regard to demand, it has been relatively steady across the Wider PMA. However it is particularly strong in the Local PMA – Surrey Heath. Whilst demand for light industrial and industrial premises in Surrey Heath is strong than the Wider PMA, the lack of available office floorspace arising from the steep loss of premises and no new completions, has helped back the sector in Surrey Heath.
- 4.1.6. Forecasts show considerable demand for employment floorspace with about 450,000 sqft of new offices and nearly 600,000 sqft of new industrial premises over the plan period. There is insufficient employment land available to meet this demand. The analysis of the supply-demand balance shows considerable deficits of floorspace and employment land across the three employment sectors. We estimate that Surrey Heath needs to allocate about 10 ha of new employment land to meet the needs of its local economy. If wider demand were considered, then the employment land requirement would be greater.

4.2. Property Market Area

- 4.2.1. This section covers the two PMAs for Land at Fairoaks. These are presented in **Figure 4.1**. The Local PMA covers the Surrey Heath Borough Council area. This geography is assessed because it enables a comparison between this property market assessment and the Council's own evidence base set out in Chapter 3.
- 4.2.2. The Wider PMA covers three local authorities: Surrey Heath, Woking Borough Council and Runnymede Borough Council. The Wider PMA is primarily defined by its strategic roads: the M25 and M3 and by its proximity to Greater London.
- 4.2.3. The PMAs is not in alignment with the boundary of the Council's Functional Economic Area (FEA) which is comprised of Surrey Heath, Hart District Council and Rushmoor Borough Council. The FEA has less

influence on the economic and property market considerations of Land at Fairoaks and this was taken into account in the PMA. The location of Land at Fairoaks is predominantly oriented towards Greater London and the two local authorities on its border: Woking and Runnymede.

Figure 4.1 Map Including Local PMA – Surrey Heath and Wider PMA



Source: Savills (2022)

4.3. Supply

4.3.1. This section sets out the state of supply across the three property sectors in the PMAs.

There is An Overall Shortage of Supply Across the Wider PMA

4.3.2. **Table 4.1** presents supply in the Wider PMA across the three key employment sectors. It shows that the supply of available premises across the three sectors is relatively tight and there has been a modest rate of new supply.

Table 4.1: Wider PMA

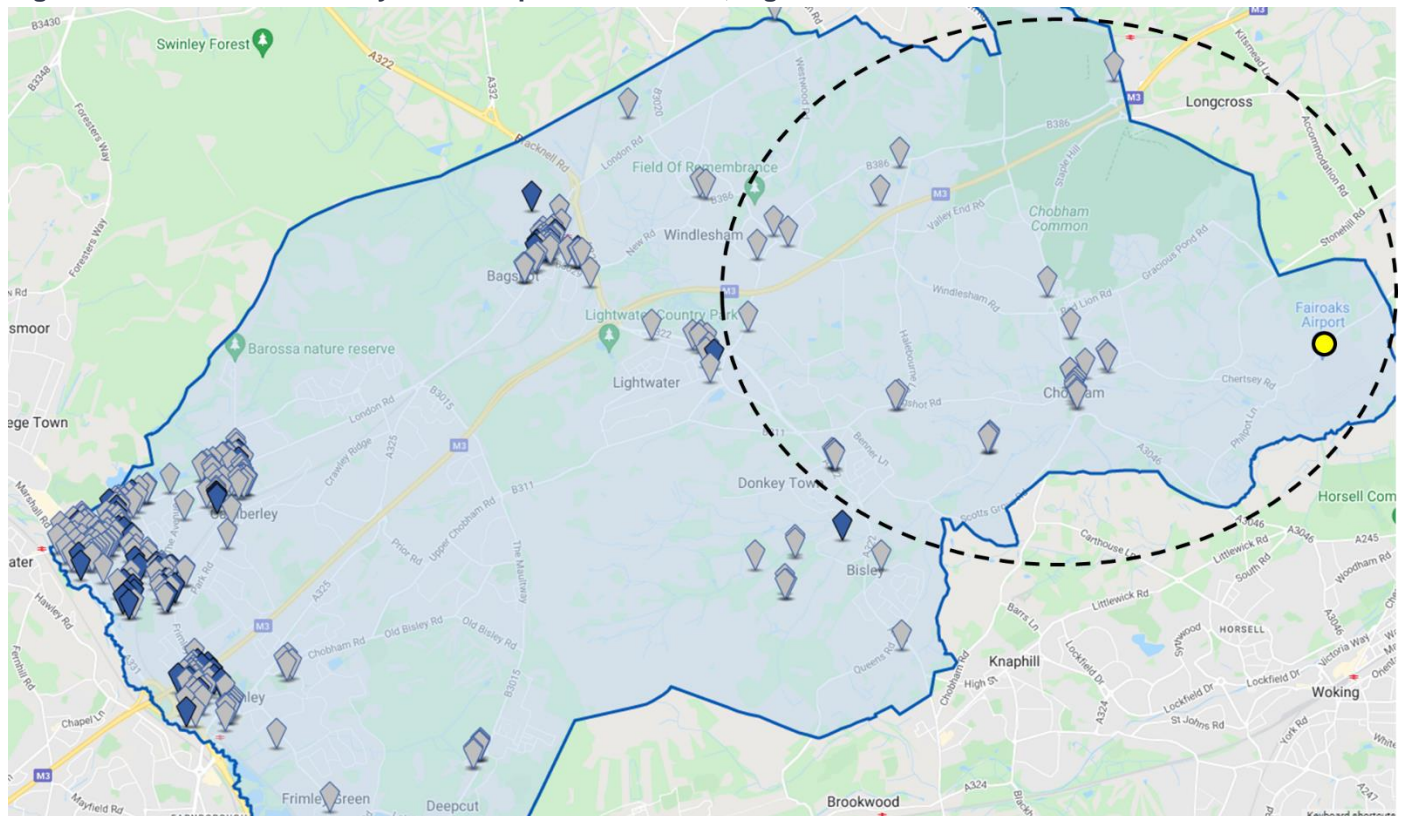
Market	Inventory	Vacancy Rate	New Supply (2009-YTD)	New Supply as % of Inventory (per annum)
Offices	9,409,910	7.3%	837,937	0.7%
Light Industrial	1,204,789	1.4%	26,136	0.2%
Industrial	5,989,259	4.6%	599,892	0.8%

Source: CoStar (2022), Savills (2022)

Supply Shortage in Surrey Heath is Acute, Especially in the Eastern Park of Borough and for Office Premises

4.3.3. **Figure 4.2** presents a map that includes most of the Surrey Heath administrative boundary. The diamonds show all the office, light industrial and industrial premises in the council area. Fairoaks Airport is indicated by the yellow dot. The grey diamonds show premises that are fully occupied and the dark blue diamonds show premises where there is availability. The dashed oval shows the area where there is no availability. The image demonstrates that there is no availability in the eastern part of the Borough (with the exception of several very small functionally obsolete units at Fairoaks Airport) and that it is severely supply constrained. Most availability is on the far western part of the Borough around Camberley and Frimley which is about 8 miles from Fairoaks Airport.

Figure 4.2 Local PMA – Surrey Heath Map With All Office, Light Industrial and Industrial Premises



Source: CoStar (2022)

4.3.4. **Table 4.2** presents the Local PMA – Surrey Heath. There is an acute shortage of office premises in Surrey Heath and since 2009 there has been no new offices completions. The light industrial and industrial markets area also supply constrained.

Table 4.2: Local PMA – Surrey Heath

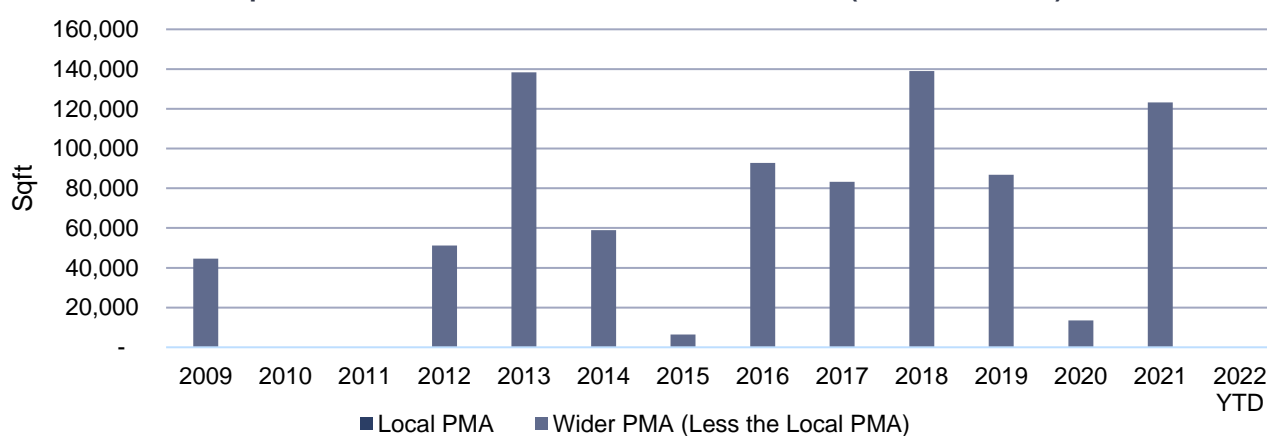
Market	Inventory	Vacancy Rate	New Supply (2009-YTD)	New Supply as % of Inventory (per annum)
Offices	2,268,502	3.7%	0	0.0%
Light Industrial	313,850	2.7%	26,136	0.6%
Industrial	2,410,788	5.5%	240,999	0.8%

Source: CoStar (2022), Savills (2022)

There Has Been Is No Delivery of New Offices in Surrey Heath Since 2009

4.3.5. **Figure 4.3** presents office completions in the Wider and Local PMA since 2009. There is no delivery of new office premises in the Local PMA – Surrey Heath. All new delivery has taken place in the Wider PMA (excluding Surrey Heath) which has seen a relatively steady rate of delivery.

Figure 4.3 Historic Completions of Offices in the Local and Wider PMA (2009 to Present)

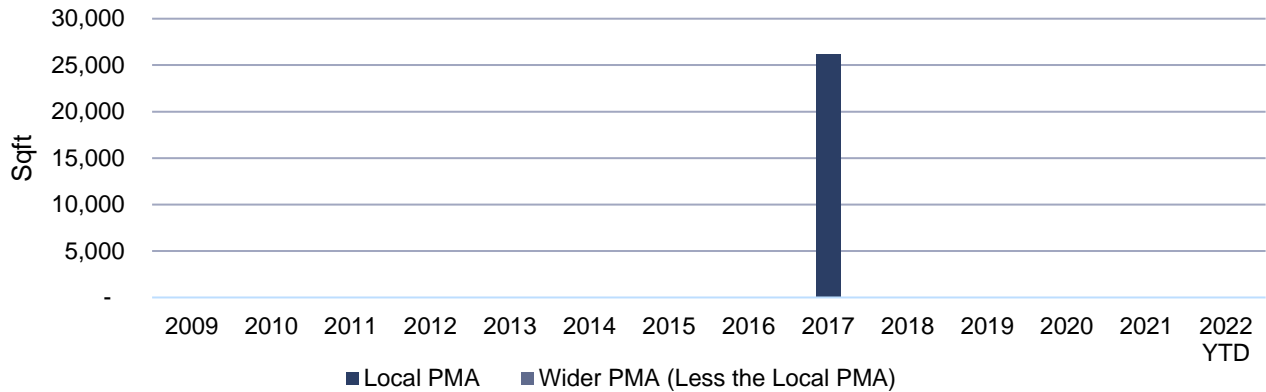


Source: CoStar (2022)

Very Limited New Supply of Light Industrial Premises Since 2009

4.3.6. **Figure 4.4** illustrates the low level of delivery of light industrial premises since 2009. In 2017 there was a single new premises in Surrey Heath of about 25,000sqft.

Figure 4.4 Historic Gross Delivery of Light Industrial Premises in the Primary PMA (2009 to Present)

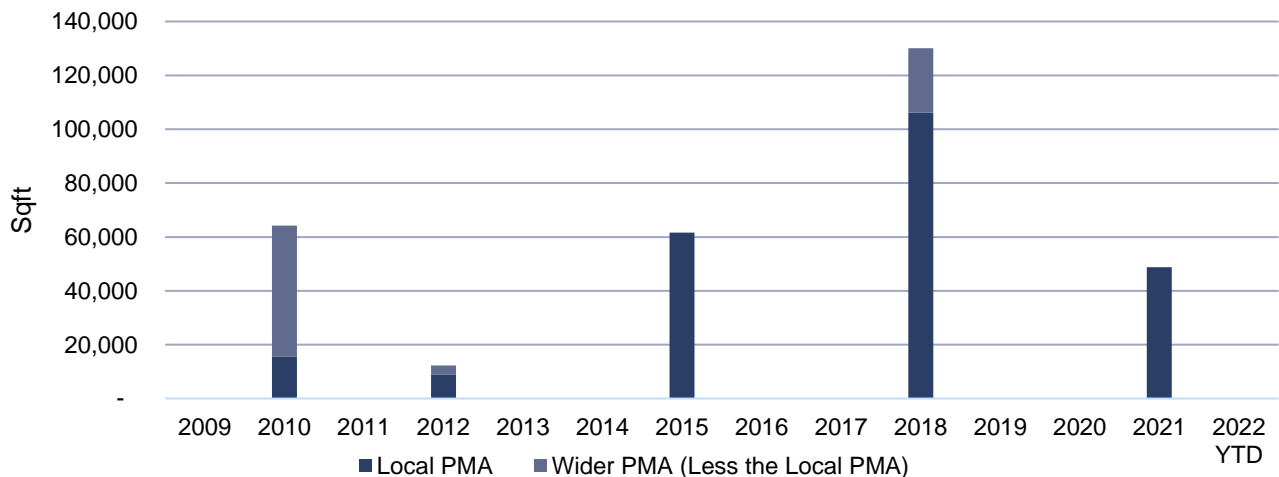


Source: CoStar (2022)

Some Limited Delivery of Industrial Premises Since 2009

4.3.7. **Figure 4.5** suggests that the delivery of industrial premises between 2009 and today has been inconsistent. In 2010, the delivery was higher in the Wider PMA, but this fell to zero in the following year. Years 2012, 2015, 2018 and 2021 are the only years that saw some delivery of new industrial premises, the majority of which was in the Wider PMA. Year 2018 was when the delivery was at its highest rate for industrial premises, which saw a total of more 120,000sqft of new industrial premises in both of the PMAs.

Figure 4.5 Historic Gross Delivery of Industrial Premises in the Primary PMA (2009 to Present)



Source: CoStar (2022)

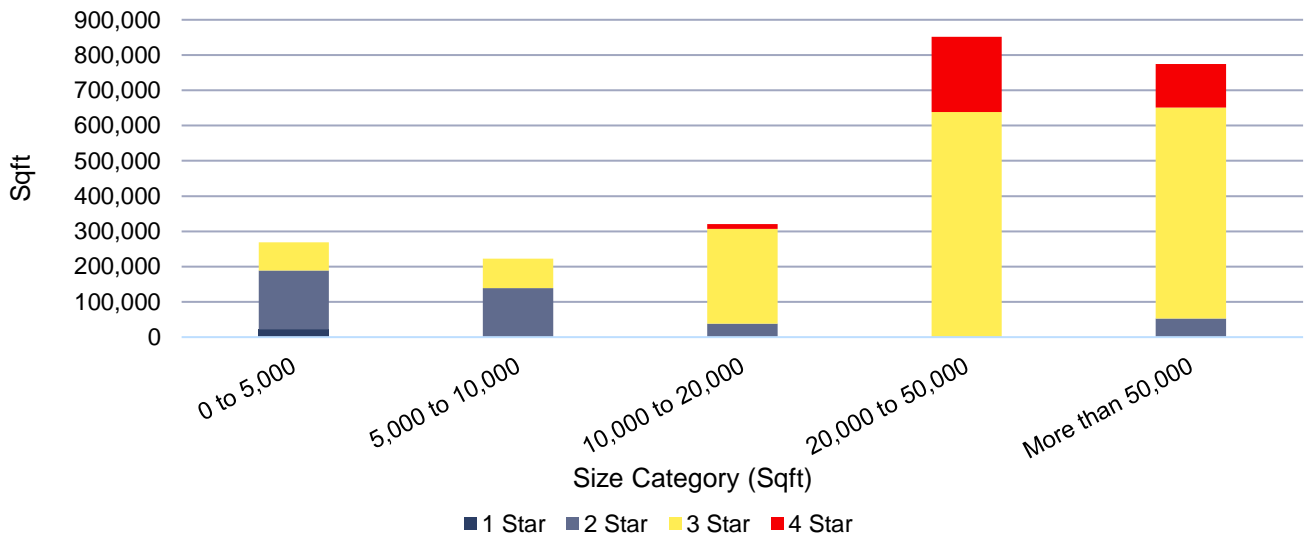
Surrey Health's Office Stock is Mostly of Average or Below Average Quality Due to Loss of Premises and No New Supply; Small Offices Dominated by Poor Quality and There is Little of It

4.3.8. **Figure 4.6** presents an assessment of the quality of office stock in the Local PMA – Surrey Health by size category. The quality ranges from below average premises (1 and 2 stars), average quality (3 stars) and above average quality (4 and 5 stars).

4.3.9. Across all size categories, only 15% of office stock is of above average quality. 85% of office stock is of average or below average quality. Smaller premises below 10,000 sqft is dominated by stock that is of

below average quality. The poor quality of the office stock is because there has been no new office provision in Surrey Heath since at least 2009.

Figure 4.6 Office Stock by Quality in Local PMA – Surrey Heath

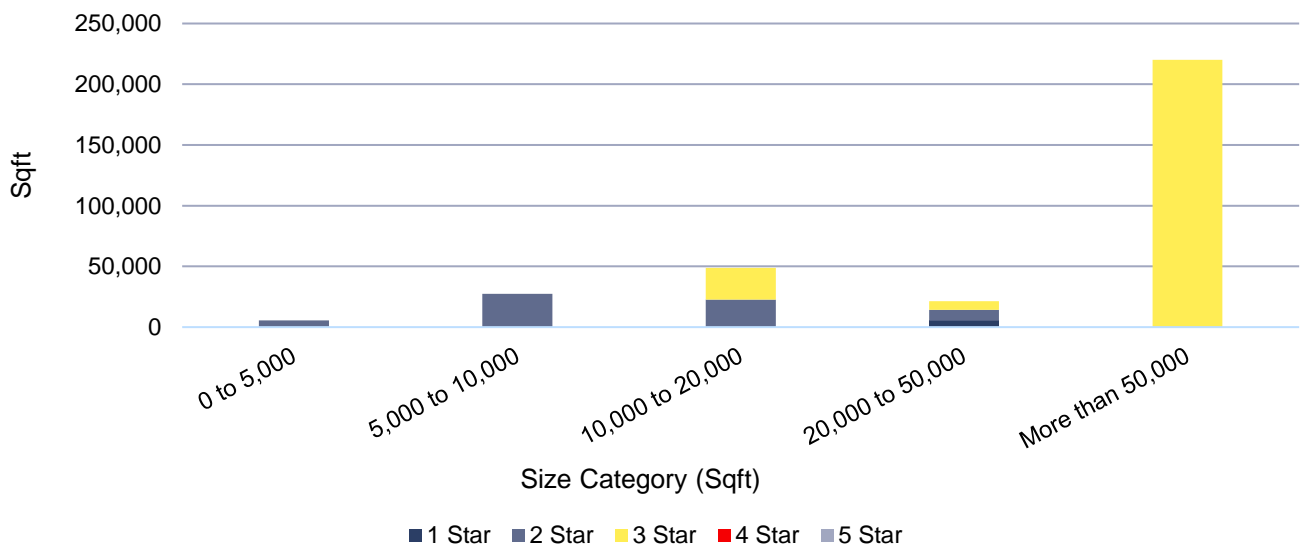


Source: CoStar (2022)

Surrey Heath's Small Light Industrial Premises is of Average or Below Average Quality

4.3.10. **Figure 4.7** shows the quality of light industrial stock by size category. It shows that the largest size of light industrial premises is of average quality. No light industrial premises are of above average quality. There is very little small-scale stock to meet the needs of SMEs.

Figure 4.7 Light Industrial Stock by Quality in Local PMA

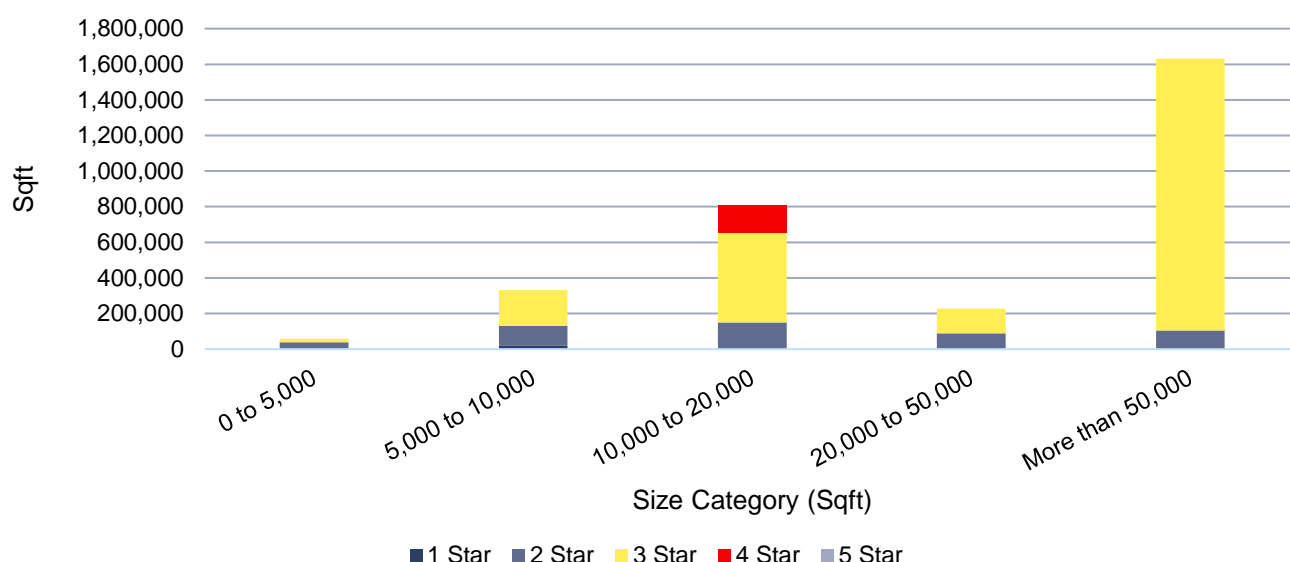


Source: CoStar (2022)

Industrial Stock is Primarily of Average; Very Little Stock for SMEs

4.3.11. **Figure 4.8** shows the quality of industrial stock by size category. The majority of industrial stock is of average or below average quality. There is very little stock oriented towards smaller tenants and SMEs.

Figure 4.8 Industrial Stock by Quality in Local PMA



Source: CoStar (2022)

4.4. Future Supply

4.4.1. **Table 4.3** presents the pipeline of anticipated development in the Local PMA – Surrey Heath. New supply is anticipated although it is all located around Camberley and Frimley.

Table 4.3 Anticipated Supply of New Floorspace

Site / Address	Sector	Floorspace	Status	Anticipated Date of Completion
Building 4.2, Frimley Business Park, Camberley	Offices	35,143	Under Construction	2022
40 Glebeland Road, Camberley (extension of existing premises)	Light Industrial	8,500	Proposed	2023
200 Frimley Business Park, Camberley	Light Industrial	90,000	In Planning	2024
Chertsey Road, Windlesham	Industrial	130,000	Proposed	2024
Doman Road, Camberley	Industrial	172,000	Proposed	2021

Source: Glenigans; CoStar (2022)

4.5. Demand

4.5.1. This section sets out state of demand across the three property sectors in the PMAs.

Demand Is Steady Across All Relevant Premises Types Within the Wider PMA

4.5.2. **Table 4.4** sets out the high-level metrics of demand in the Wider PMA. It shows relatively steady demand across the different property sectors with net absorption averaging between 0.5% and 1.0% of existing stock.

Table 4.4 Demand – Wider PMA

Sector	Inventory (sqft)	Total Net Absorption (2009 - Present) (sqft)	Average Net Absorption Per Annum (2009 - Present) (sqft)	Annual Net Absorption as % of Total Inventory	Market Rent (£ per sqft)
Offices	9,409,910	898,022	119,736	0.7%	£29.00
Light Industrial	1,204,789	72,541	9,672	0.5%	£12.96
Industrial	5,989,259	796,196	106,159	1.0%	£14.47

Source: CoStar (2022)

Local PMA - Surrey Heath Exhibits Strong Demand for Light Industrial/Industrial But Offices Is Held Back By a Lack of Supply & Loss of Premises

4.5.3. Demand in the Local PMA - Surrey Heath is presented in **Table 4.5**. Demand was particularly strong in the light industrial and industrial sectors. Demand in the office sector has been lower but this is a reflection of the lack of available floorspace and the loss of a significant amount of office premises resulting from permitted development.

Table 4.5 Demand – Local PMA – Surrey Heath

Sector	Inventory (sqft)	Total Net Absorption (2009 - Present) (sqft)	Average Net Absorption Per Annum (2009 - Present) (sqft)	Annual Net Absorption as % of Total Inventory	Market Rent (£ per sqft)
Offices	2,268,502	129,964	9,283	0.4%	£20.88
Light Industrial	313,850	70,496	5,423	1.7%	£15.60
Industrial	2,410,788	412,596	29,471	1.3%	£12.07

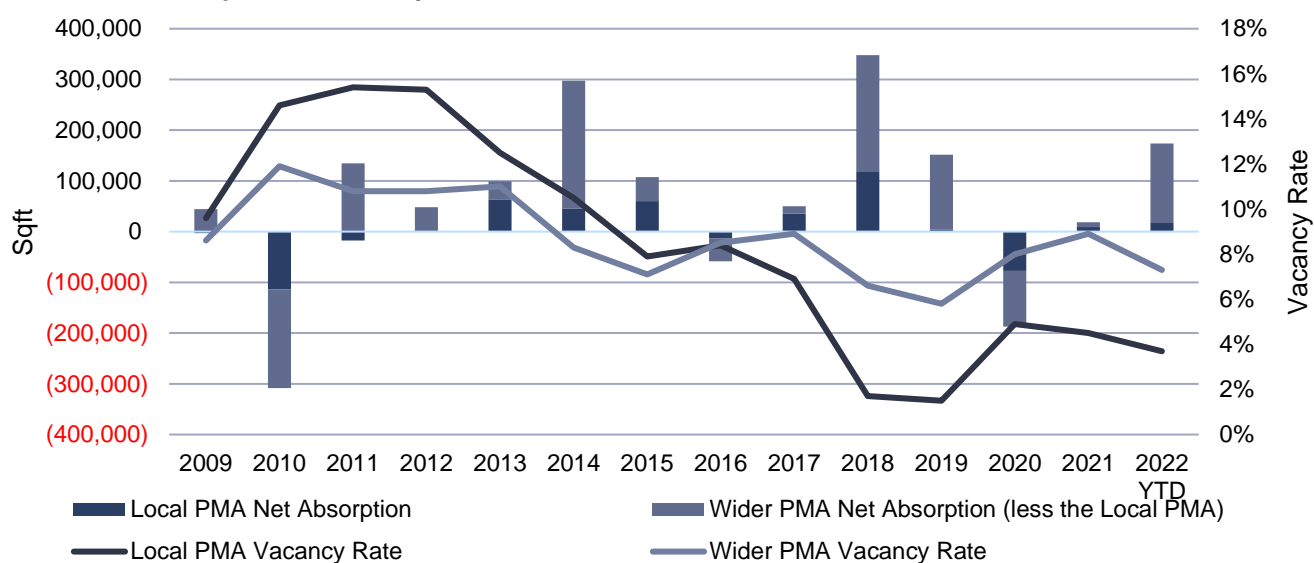
Source: CoStar (2022)

4.5.4. The following analysis in **Figures 4.8, 4.9 and 4.10** present the historic demand in both PMAs across the three property sectors.

Steady Demand for Offices in the Local PMA – Surrey Heath (With no Supply Response) Has Driven Vacancy Rates Down

4.5.5. **Figure 4.9** shows that in the Local PMA – Surrey Heath the steady demand for offices has resulted in a continuous reduction in office vacancies since 2012. The Local PMA – Surrey Heath is considered to have been supply-constrained since 2016 when the vacancy rate first fell below 8%. This is the vacancy rate below which there is deemed to be an insufficient supply of offices.

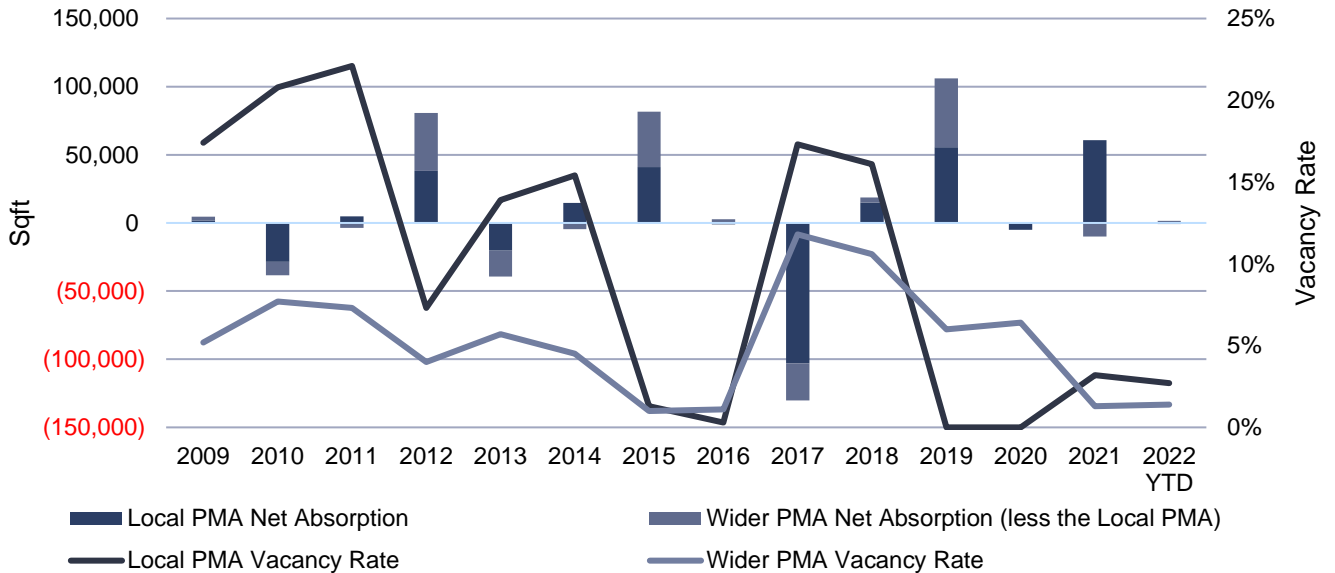
Figure 4.9 Net Absorption & Vacancy Rates in Local and Wider PMAs for Office



Source: CoStar (2022)

4.5.6. **Figure 4.10** shows that in the relatively small light industrial market demand has been somewhat volatile. However over the last three years steady demand has driven vacancies down significantly. This suggests that demand for light industrial premises is relatively strong.

Figure 4.10 Net Absorption & Vacancy Rates in Local and Wider PMAs for Light Industrial

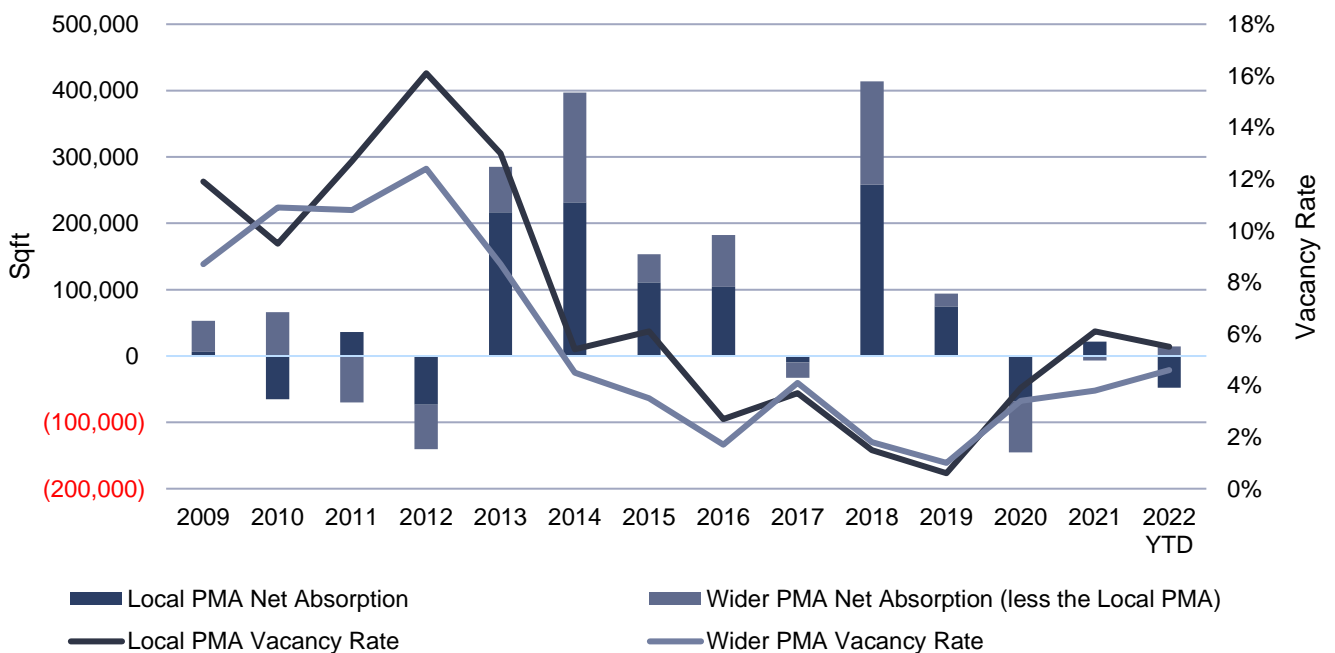


Source: CoStar (2022)

Demand for Industrial Has Been Strong, Mirroring National Performance

4.5.7. **Figure 4.11** shows that strong demand between 2014 and 2018 drove vacancies down both in the Wider and Local PMAs. This mirrors national performance.

Figure 4.11 Net Absorption & Vacancy Rates in Local and Wider PMAs for Industrial



Source: CoStar (2022)

4.6. Demand Forecast

4.6.1. This section presents forecasts of future floorspace demand based on (1) each property sector's historic trend demand and (2) if appropriate, an uplift that reflects historic suppressed demand. Suppressed demand is net absorption that was foregone/not captured because there has not been sufficient floorspace capacity available on the market. The Savills' bespoke suppressed demand model¹ calculates the amount of floorspace that could have been captured if the rate of availability had been above 8%.

4.6.2. **Table 4.6** presents a summary of the demand forecasts for the three property sectors. It applies the annual rate at which occupied floorspace increased between 2009 and 2021 to the level of occupancy between 2022 and 2037. The net change in occupancy from year to year is the equivalent of net absorption.

Table 4.6 Demand Forecasts for Local PMA – Surrey Heath

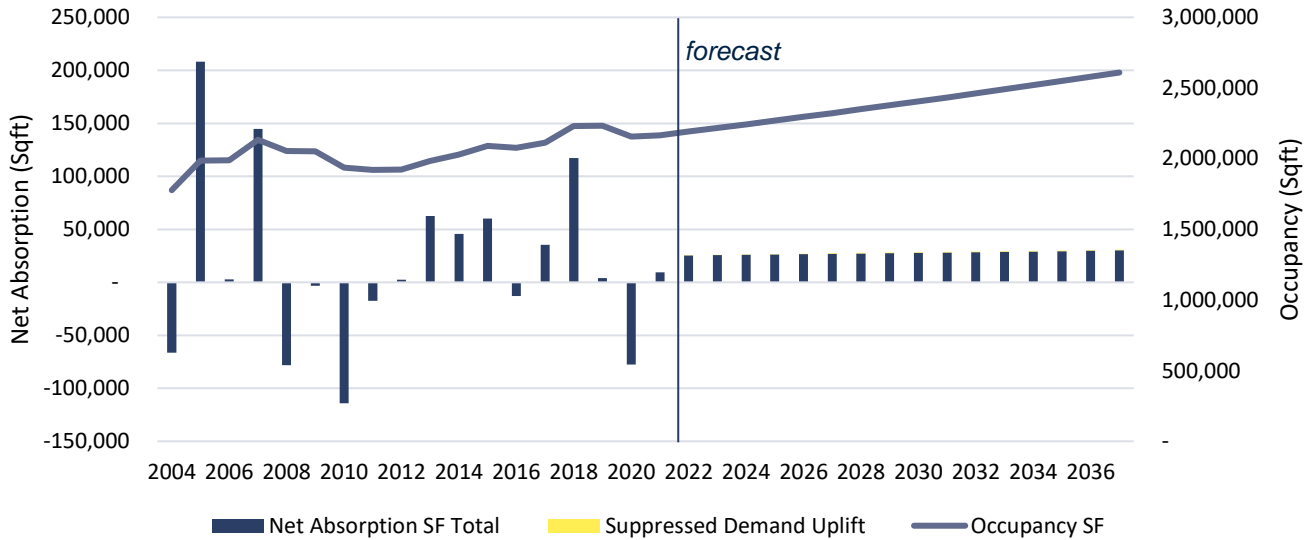
Sector	Historic Annual Rate of Growth of Occupancy (2009 to 2021)	Average Net Absorption Per Annum (2022-2037)	Average Annual Uplift from Historic Suppressed Demand (2022-2037)	Total Average Annual Demand (2022-2037)	Total Demand (2022-2037)
Offices	1.2%	27,700	500	28,200	452,176
Light Industrial	2.1%	7,400	1,700	9,100	144,730
Industrial	1.4%	35,700	700	36,400	582,415

Source: CoStar; Savills (2022)

4.6.3. **Figures 4.12, 4.13 and 4.14** present the demand forecasts in graphical form for the three property sectors. They show the historic series and forecasts of net absorption (left axis) and the level of occupancy (right axis).

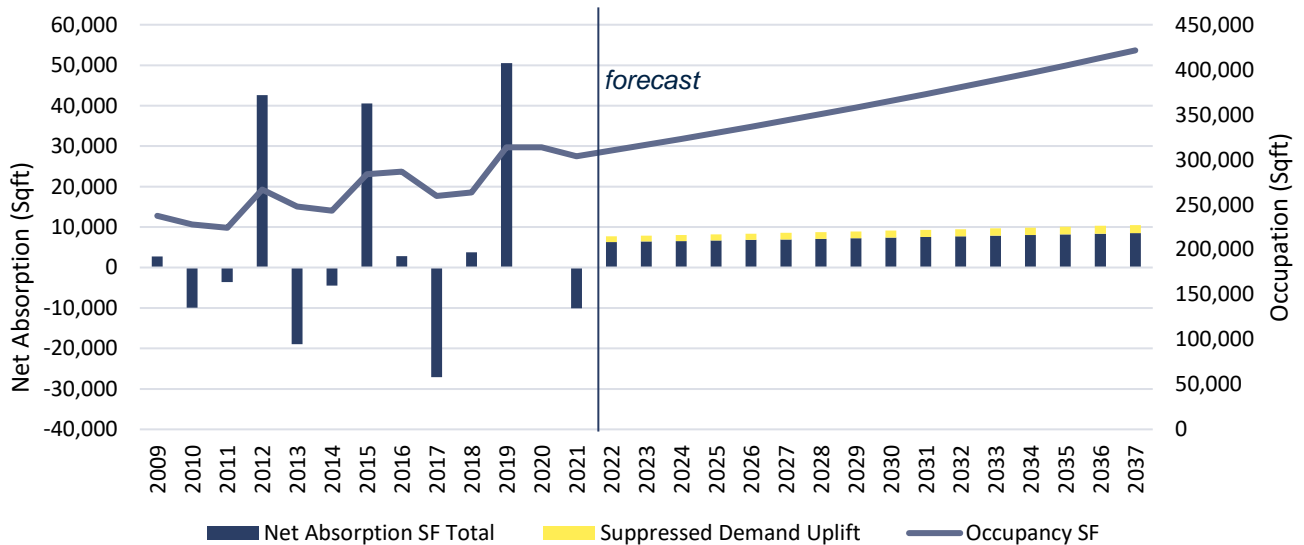
¹ https://www.savills.co.uk/research_articles/229130/326438-0

Figure 4.12 Demand Forecast for Offices in Local PMA – Surrey Heath



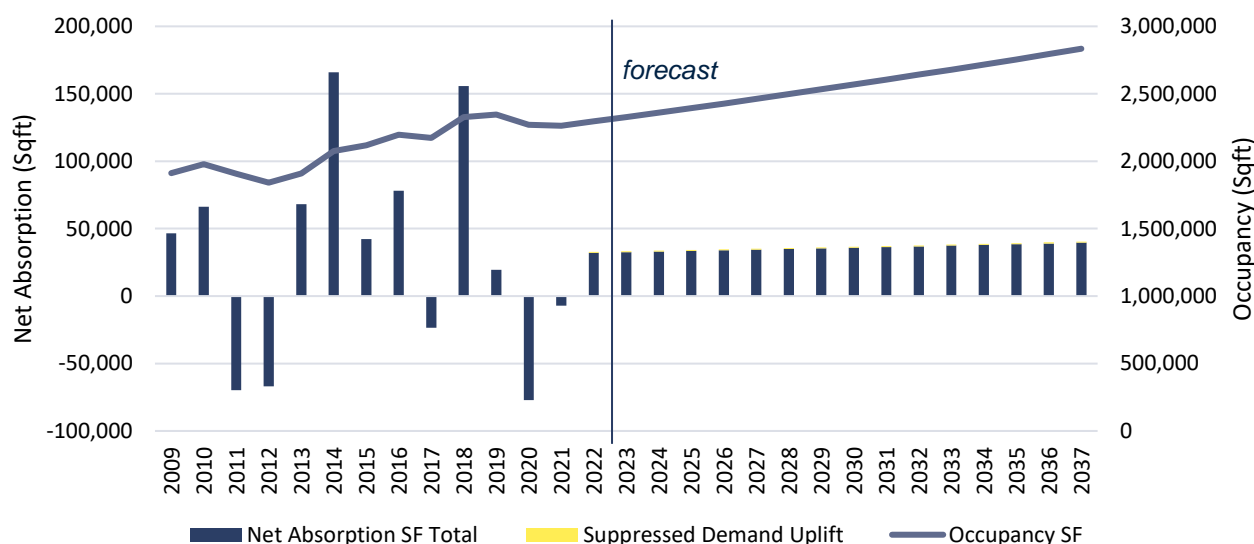
Source: CoStar; Savills (2022)

Figure 4.13 Demand Forecast for Light Industrial in Local PMA – Surrey Heath



Source: CoStar; Savills (2022)

Figure 4.13 Demand Forecast for Industrial in Local PMA – Surrey Heath



Source: CoStar; Savills (2022)

4.7. Balance of Supply and Demand

The Analysis Identifies About 10ha of Additional Employment Land Required to Meet Demand Across the Three Employment Sectors

- 4.7.1. This section compares current and anticipated supply in the Local PMA – Surrey Heath with forecasted demand to estimate the amount of additional employment floorspace and land required across the three property sectors over the period of the draft Local Plan (to 2037). It draws upon the the earlier supply sections in this chapter and the demand forecasts from the previous sections. The analysis finds that across the three employment sectors, there is an identified need of about 10 hectares of additional employment land.
- 4.7.2. **Table 4.7** presents the supply-demand balance for offices in the Local PMA – Surrey Heath. It shows that there is a deficit over the plan period of over 300,000 sqft which is equivalent to 5.8 ha.

Table 4.7 Balance of Supply and Demand for Offices in the Local PMA – Surrey Heath

Current Supply (Vacant Floorspace at the end of 2021 (sqft)	102,494
Anticipated Supply (2021 to 2037)	35,143
Total Supply (2021 to 2037)	137,637
Total Demand (2021 to 2037)	452,176
Surplus / Deficit (Total Supply less Total Demand)	(314,539)
Conversion of Office Floorspace Deficit Over Plan Period in to Employment land (0.5 site coverage ratio)	5.8 ha

Source: CoStar; Savills (2022)

4.7.3. **Table 4.8** presents the supply-demand balance for light industrial premises in the Local PMA – Surrey Heath. It shows that there is a deficit over the plan period of about 40,000 sqft over the plan period to 2037 which is equivalent to 0.8 ha of additional employment land.

Table 4.8 Balance of Supply and Demand for Light Industrial in the Local PMA – Surrey Heath

Current Supply (Vacant Floorspace at the end of 2021 (sqft))	10,052
Anticipated Supply (2021 to 2037)	98,500
Total Supply (2021 to 2037)	108,552
Total Demand (2021 to 2037)	144,730
Surplus / Deficit (Total Supply less Total Demand)	(36,178)
Conversion of Light Industrial Office Floorspace Deficit Over Plan Period into Employment land (0.4 site coverage ratio)	0.8 ha

Source: CoStar; Savills (2022)

4.7.4. **Table 4.9** presents the supply-demand balance for industrial premises in the Local PMA – Surrey Heath. It shows that there is a deficit over the plan period of over 130,000 sqft which is equivalent to 3.1 ha.

Table 4.9 Balance of Supply and Demand for Industrial Premises in the Local PMA – Surrey Heath

Current Supply (Vacant Floorspace at the end of 2021 (sqft))	147,781
Anticipated Supply (2021 to 2037)	302,000
Total Supply (2021 to 2037)	449,781
Total Demand (2021 to 2037)	582,415
Surplus / Deficit (Total Supply less Total Demand)	(132,634)
Conversion of Office Floorspace Deficit Over Plan Period into Employment land (0.5 site coverage ratio)	3.1 ha

Source: CoStar; Savills (2022)

4.7.5. **Table 4.10** summarises the employment land need across the three sectors.

Table 4.10 Summary of Employment Floorspace and Land Deficit

Sector	Employment Floorspace Deficit (Sqft)	Employment Land Deficit (ha)
Offices	(314,539)	5.8
Light Industrial	(36,178)	0.8
Industrial	(132,634)	3.1
Total	(483,351)	9.7

Source: CoStar; Savills (2022)

5. The Case for Land at Fairoaks; Observations of Evidence Base & Market Assessment

5.1. Introduction and Summary

5.1.1. This section justifies the proposed Land at Fairoaks as a Strategic Employment Site (SES). It is based on concerns about the Council's evidence base used by to justify its draft Local Plan employment land policies and a range of other observations.

5.1.2. The range of concerns are categorised as follows:

- Concerns about the assessment of employment land need in the evidence base;
- Concerns about the process of designating employment land in the draft Local Plan; and
- Key findings from Savills market assessment.

5.1.3. The observations made in this chapter point towards these findings:

- The emerging Local Plan underestimates its employment land requirement and should allocate more employment land to meet the needs of the economy;
- Surrey Health's proposed employment land allocation at Fairoaks Airport should be extended to reflect the 11 ha Land at Fairoaks;
- Land at Fairoaks should be removed from the Green Belt; and
- Land at Fairoaks should be designated a Strategic Employment Site.

5.2. Concerns about Assessment of Employment Land Need in Evidence Base

5.2.1. This section covers concerns about the ELTP and the approach to identifying employment land need. The report concludes that there is no need to make new employment land available. This is because either overall demand is negative (according to some of its forecast scenarios) or because existing employment land will be able to be redeveloped to accommodate new uses. The report relies on two demand scenarios that are based on anticipated employment growth. However this is not a sound basis for forecasting need. The correlation between employment growth and floorspace demand is not statistically established. The council should use metrics that are more oriented towards the property market performance as has been done in Savills own property market assessment in chapter 4.

The ELTP Largely Ignores the Market Signals and Need at the Sub-Regional Level

5.2.2. The ELTP reviews market signals and identifies very low vacancy rates in the Borough. However the analysis does not cite the lack of vacant floorspace as a concern that needs to be addressed and is of immediate concern.

5.2.3. The report identifies the FEA as a relevant property market geography but does not substantively analyse its property market dynamics or use its supply-demand dynamics to inform Surrey Health's need. The property market assessment is primarily focused on Surrey Heath. Savills' own property market analysis shows shortages of employment premises both in the Wider PMA as well as in Surrey Heath. More analysis should have been undertaken to understand wider property market dynamics and its implications for Surrey

Heath's capacity to meet wider need.

It is Unrealistic for Existing Employment Land to Meet the Needs of the Local Economy

- 5.2.4. Whilst the ELTP concludes that about 10 ha of employment land should be made available to meet identified need, the draft Local Plan assumes that it can meet this solely by relying on the redevelopment of its existing employment land. It assumes that its forecasted decline in demand for manufacturing premises can simply be replaced by offices and warehouses on the same land. However this is unrealistic. It assumes that existing land, if it were to become available, could be commercially attractive for other uses. This is unlikely. Different sectors have different locational requirements and seek different operational environments.

The Report Does Not Address the Local Authority's Relationship with Greater London and LAs to the East

- 5.2.5. Surrey Heath has a strategic location on the edge of Outer London and the local authorities to the east of the Borough have become important economic drivers, especially for Land at Fairoaks. Much of the recent activity related to studio/film production activity at Fairoaks has arisen because of its accessibility and proximity to Greater London. The ELTP ignores these important growth drivers to the east of the Borough and appears to have focussed its attention primarily on the western part of the Borough.

5.3. Concerns about Process of Employment Land Designation in the Emerging Local Plan

The Criterion Used to Distinguish Between SES and LIES is Arbitrary; Land at Fairoaks Should be an SES

- 5.3.1. **Table 5.1** presents the sizes of the proposed Strategic Employment Sites (SESs) from the draft Local Plan and which are assessed in the ELTP. The average site size across all the SESs is 9.6 ha. Without Yorktown Business Park the average site size reduces to 6.9 ha. Whilst the draft Plan's proposed Fairoaks Airport designation is about 7.1 ha (and just 3.6 ha when excluding the Chobham Business Centre site on the other side of the Chertsey Road A319), this representation's proposed Land at Fairoaks is about 11 ha and has the scale, strategic location and economic influence that would make it appropriate to be designated an SES.
- 5.3.2. As a point of comparison, the average size of the proposed designated Locally Important Employment Sites LIES is 2.9 ha (excluding Fairoaks Airport).

Table 5.1 Proposed Strategic Employment Sites from Draft Local Plan

Site	Site Size
Admiralty Park, Camberley	5.2
Albany Park, Frimley	6.6
Land at Knoll Road, Camberley Town Centre	1.8
Erl Wood, Windlesham	8.8
Former Defence Evaluation and Research Agency Site Longcross, near Chobham	8.6
Former British Oxygen Company Site, Chobham	8.4

Site	Site Size
Mytchett Place, Mytchett	2.0
Frimley Business Park, Frimley	5.5
Lyon Way, Frimley	10.4
Watchmoor Business park, Camberley	11.4
Yorktown Business Park, Camberley	37.0

Source: Draft Surrey Heath Local Plan: Preferred Options (2019-2038); Employment Land Technical Paper Update 2019

The Site Assessment of Land at Fairoaks Doesn't Reflect its Current Activities and Commercial Attractiveness

- 5.3.3. The ELTP's assessment of Fairoaks Airport characterises the site as primarily aviation-related and seems to indicate that most of the occupiers are oriented towards airport activities. The assessment is inaccurate as shown in chapter 2 of this representation which presents the existing uses. Only two of the current 72 tenants actually use the airport facilities (runway and aerodrome) and even though there remain some other aviation-related uses, they do not need to be at an airport.
- 5.3.4. The tenancy base at Fairoaks Airport comprises a wide range of sectors which draw workers from across Greater London. This includes studio/film production, professional services, IT consultancy, food/catering, engineering, creative/arts and business services. The companies range from locally-based SMEs and start-ups to large multinational corporations including Apple, Netflix and Paramount. In spite of the poor condition of the current premises, there continues to be strong demand. The site has far greater economic activity and influence than suggested in the site assessment. The tenancy base is also far more diverse than suggested. The current uses point to Fairoaks Airport being commercially attractive and providing good access to the strategic road network and to the Greater London employment market.

5.4. Findings from Savills Site and Market Assessment

- 5.4.1. There are a range of important observations made in this representation that support an expansion of the designation in the draft plan to the Land at Fairoaks proposed site and its re-designation as a Strategic Employment Site (SES) instead of a Locally Important Employment Site (LIES).

Expanding the Proposed Designation in the Draft Plan to Reflect the Land at Fairoaks Proposal Would Create More Economic and Placemaking Opportunities

- 5.4.2. The proposed site in the draft Local Plan, whilst having successfully attracted a range of dynamic businesses, is too narrow and awkwardly shaped to provide the scope to enable a more commercially attractive cluster that could extent what is already a critical mass of economic activity. Land at Fairoaks which is the proposed 11 ha expanded site would provide the scope and capacity to establish a more commercially attractive development proposition and a far more viable employment cluster in the east of the Borough. A larger site would enable provision of greater amenity; additional opportunities to create synergies between the various businesses; the flexibility to help retain any existing businesses who would wish to remain on-site during redevelopment; and enable placemaking.

There is a Current Acute Shortage of Employment Land and Premises that is Not Addressed in the Emerging Plan

- 5.4.3. Both the ELTP and the Chapter 4 Property Market Assessment identified an acute shortage of employment premises in the Local PMA – Surrey Heath. The Borough is characterised by very low overall vacancy and virtually no available units in its eastern half. The approximately 11 ha Land at Fairoaks provides the Council with the opportunity to build upon a vibrant existing employment cluster with much-needed undeveloped employment land. Both the ELTP and the Chapter 4 Property Market Assessment identify a need for about 10 ha of employment land. However, whilst the ELTP unrealistically assumes that this need could be met by redeveloping existing employment land, the Land at Fairoaks provides the Council with an additional 7.4 ha of further employment land that would increase the likelihood of meeting the economic needs of the Borough.

Land at Fairoaks Chobham, Surrey

Preliminary Landscape and Visual Appraisal and Green Belt Review



Prepared for:
Vistry Group plc

22 August 2025

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Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date

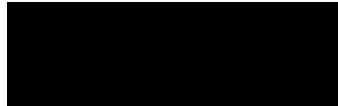


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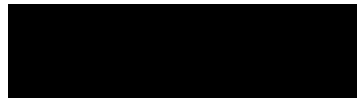
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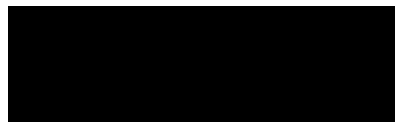
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Executive Summary

The Site is located north of Woking, with Chobham 2.1 miles west and Ottershaw 1.3 miles east, primarily within Surrey Heath Borough. The eastern extent reaches into Runnymede Borough, while the southern boundary adjoins Woking Borough. Ottershaw Park and the Grade II Listed Mansion are directly north of the Site. The Site features several Public Rights of Way (PRoW) connecting it to a wider network of paths, Open Access Land, and the McLaren Park.

Over 44% of land within Surrey Heath is designated as Metropolitan Green Belt. The Site is located within the Metropolitan Green Belt, it is not covered by any additional landscape designations and falls outside the Thames Heath SPA buffer. However, the Fair Oaks Airport area, including its business park, is classified as a Major Developed Site (3.66ha) in the Green Belt, with 49ha of Previously Developed Land (PDL). The Site comprises airport facilities and a business park in the northwest, an airfield with runways in the central-west, river meadows along the southern boundary, and agricultural fields and parkland to the east and centre.

The landscape of the Site varies from industrial and open airfield areas to agricultural fields and the River Bourne Valley. The Site falls primarily within the SS8: Chobham East Settled and Woody Sandy Farmland Landscape Character Area (LCA) and, to a lesser extent, the SS4: Wentworth and Sheerwater Settled and Wooded Sandy Farmland LCA, and RF5: Windlebrook and Southern Bourne River Floodplain LCA. Much of the Site is "open" in character due to its use as an airfield, but its openness is enclosed by the surrounding wooded and vegetated landscape.

The proposed development is landscape-led, aligning with Green Belt assessments for Surrey Heath and Runnymede. It will consider the positive features of the surrounding LCAs and reflect the findings of the 2021 Landscape Sensitivity Study. Development will focus on the previously developed areas of the airport and its business park, minimising impacts on key landscape attributes. The strategy includes enhanced green infrastructure and a transition from built areas to the wider countryside, respecting the varied landscape sensitivities of the Site.

The development will offer enhanced connectivity to the broader PRoW network and Open Access Land, benefiting both new and existing communities. It aims to create a distinct new settlement with a character and identity that reflects the local vernacular and remains visually separate from nearby settlements.

Green Belt

The National Planning Policy Framework (NPPF) addresses Green Belt, stating "*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*" and that "*the essential characteristics of Green Belts are their openness and their permanence*". The purposes of the Green Belt as set out in the NPPF, relevant to the Site, are:

- "a) To check the unrestricted sprawl of large built-up areas;*
- b) To prevent neighbouring towns merging into one another;*
- c) To assist in safeguarding the countryside from encroachment; and*
- d) To preserve the setting and special character of historic towns."*



The Preliminary LVA and Green Belt Review finds that the Site does not perform strongly for Purposes 1, 2, 3 and 4, making no contribution to Green Belt Purposes 1 and 4 and varying contribution to Purposes 2 and 3, with moderate to none contribution.

With regard to the key characteristics of the Green Belt, that is "*their openness and their permanence*", the Site has varying degrees of openness, in terms of presence and extent of development, increasing in openness from north-west to the south and east. There would inevitably be a reduction in 'technical openness' on the Site compared to the existing character of the Site arising from the development of the Site. However, the surrounding substantial network of woodlands, copses, tree belts, and parkland, throughout the valley floor and on the surrounding valley sides to the north, east, south and west, provide significant physical and visual enclosure around the Site, such that the appreciation of the openness of parts of the Site are very restricted, generally limited to within the Site itself.

Therefore, the Site, overall, makes a moderate to no contribution to the purposes of the Green Belt and accordingly is suitable for release, on the basis of function. With regard to the risk to the integrity of the wider Green Belt, the Site provides the opportunity for adopting strategies and approaches, as recommended in the Surrey Heath Green Belt Review 2022 (2022 Green Belt Review), to substantially reduce the risk to the integrity of the wider Green Belt; and would offer the potential to contribute to a suitable pattern of development for Surrey Heath, with numerous benefits arising from the proposed development of the Site.

Furthermore, through the provision of enhanced, robust, and clearly distinctive boundaries, the development of the Site would not affect the open character or permanence of remaining surrounding Green Belt, nor would it prejudice the ability of the remaining surrounding Green Belt to perform the purposes, and functions, of Green Belt, within Surrey Heath or Runnymede.

Grey Belt

Should the Site, in part, be considered for release from Green Belt, the NPPF (Paragraph 148, December 2024) states that:

"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. "

'Grey Belt' is defined in the Glossary within the NPPF as:

"Grey Belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

As noted, the Site contains 49ha of previously developed land which is largely urban/industrial in character, comprising Fairoaks airport, associated buildings and industrial/business park, and associated runway, taxiways and mown grass verges and surrounds. The buildings/business park is designated a Major Developed Site within Green Belt.

The remainder of the Site does not contribute 'strongly' to Purposes (a), (b) and (d), i.e. the Site contributes to Purpose (a): None, Purpose (b): Moderate to None, and Purpose (d): None; and the Site is not covered by any landscape designations or policies relating to Footnote 7, therefore, the remainder of the Site which is not previously developed land can be considered Grey Belt.



To satisfy NPPF Paragraph 155 for the development to not be regarded as inappropriate, it is necessary to demonstrate that the Site is Grey Belt land and that should the Site be developed, it would fundamentally undermine the purposes, taken together, that is Purposes (a), (b), (c), (d) and (e) of the Green Belt, of the remaining Green Belt across the area of the plan, that is within Surrey Heath and Runnymede, and at the strategic level of function regarding purposes of the Green Belt.

With respect to the fifth purpose of the Green Belt *"to assist in urban regeneration by encouraging the recycling of derelict and other urban land"*, should the Site be brought forward for development it would not prejudice derelict or other urban land being brought forward for urban regeneration. However, the principle of retaining land within the Green Belt holds true for all areas within the Green Belt, therefore the Site is considered to make the same contribution to this purpose of the Green Belt as any other land parcel within the Green Belt. Accordingly, no additional specific assessment is undertaken.

As noted, the parts of the Site that are not previously developed land do not contribute 'strongly' to Purposes (a), (b) and (d); and do not contribute strongly to Purpose (c), making at most a moderate contribution. Whilst there would be a very limited loss of 'countryside', limited to the open areas of retained as areas free from built form, beyond the areas of previously developed land, the appreciation of this loss, and the introduction of the development, on the Site, would be very limited.

Furthermore, the proposed development of the Site would provide enhancement of the area retained free from built form, including providing benefits such as improving public access and connectivity, providing locations for outdoor sport, enhancing biodiversity, and retaining and enhancing landscape and visual amenity.

As the Site is considered as previously developed land and Grey Belt, 'openness' is not required to be considered. However, for completeness, the effect on openness has been assessed. As noted, there would inevitably be a reduction in 'technical openness' on the Site compared to the existing character of the Site arising from the development of the Site. The Site has varying degrees of openness, in terms of presence and extent of development, increasing in openness from north-west to the south and east. However, proposed development would be predominantly focussed on the previously developed parts of the Site, with the majority of the more rural areas of the Site remaining free of built development and therefore open. In addition, the surrounding substantial network of woodlands, copses, tree belts, and parkland, throughout the valley floor and on the surrounding valley sides to the north, east, south and west, provide significant physical and visual enclosure around the Site, such that the appreciation of the openness of parts of the Site are very restricted, generally limited to within the Site itself.

Importantly, there would be no effect on the openness of the wider Green Belt.

With regard to the risk to the integrity of the wider Green Belt, as noted, the Site provides the opportunity for adopting strategies and approaches, as recommended in the 2022 Green Belt Review, to substantially reduce the risk to the integrity of the wider Green Belt; and would offer the potential to contribute to a suitable pattern of development for Surrey Heath, with numerous benefits arising from the proposed development of the Site.

Furthermore, through the provision of enhanced, robust, and clearly distinctive boundaries, the development of the Site would not affect the open character or permanence of remaining surrounding Green Belt.

With regard to meeting the 'Golden Rules' as required by Paragraph 155 of the NPPF, the proposed development of the Site would accord with Paragraph 156 (c) of the NPPF with regard to *"major development involving the provision of housing is proposed on sites released from the Green Belt"* in that it would deliver *"provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces"*.



In conclusion, the Site is in part previously developed land, and the remainder of the Site is considered Grey Belt; and development of the Site would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan, that is within Surrey Heath and Runnymede, and at the strategic level of function regarding purposes of the Green Belt.

The development of the Site aligns with Green Belt objectives, both at a national and borough level, focusing on previously developed land while conserving more sensitive rural areas. Proposed enhancements will improve public access, biodiversity, and landscape quality, supporting NPPF objectives for Green Belt. The development will deliver approximately 1,600 homes, creating a substantial Natural Green Space connected to wider Green Infrastructure, benefiting both new and surrounding communities, with minimal harm to the integrity of the Green Belt.



1 Introduction

1.1 Overview

- 1.1.1 Stantec UK Ltd was commissioned by Vistry Group plc in August 2024 to prepare an update the Preliminary Landscape and Visual Appraisal (LVA) and Green Belt Review of Land at Fairoaks, Chobham, Surrey, (the 'Site') with respect to the ongoing promotion of the Site, for 1,600 dwellings and 14.5ha of employment space, for Green Belt release and allocation for mixed-use new settlement development, with reference to the Pre-Submission Regulation 19 consultation on the Surrey Heath Local Plan . The Site straddles both the boroughs of Surrey Heath and Runnymede; however, the majority of the proposed built development is confined to the extent of the Site within Surrey Heath. Subsequently, Stantec UK Ltd were commissioned by Vistry Group Plc, in August 2025, to prepare a further update to the Preliminary Landscape and Visual Appraisal (LVA) and Green Belt Review of Land at Fairoaks, Chobham, Surrey, (the 'Site') with respect to the ongoing promotion of the Site in advance of the Surrey Heath Local Plan Examination in Public (EiP).
- 1.1.2 This updated version of the preliminary appraisal has been expanded to refer to the National Planning Policy Framework (NPPF) December 2024 and the National Planning Policy Guidance (NPPG) (February 2025) on Green Belt.
- 1.1.3 The Landscape and Visual Appraisal (LVA) process has been employed at an early stage to guide and inform the emerging design strategy for a potential mixed-use development with a view to minimising potential adverse landscape and visual effects from the outset.
- 1.1.4 The objective of this LVA and Green Belt Review is to provide a preliminary review of, and an update to, the previous landscape work and visual material that formed part of the planning application; the findings of which are set out in this report.
- 1.1.5 This includes an independent robust analysis of the Site and its context, to identify a series of constraints and opportunities to development and to demonstrate the suitability of the Site for development in landscape and visual terms. The LVA therefore provides a considered rationale, in terms of landscape character and visual amenity, forming the basis for the evolving masterplan.
- 1.1.6 The LVA describes:
- The existing landscape and visual baseline conditions at the Site and within the surrounding area;
 - The landscape and visual opportunities and constraints and the landscape strategies and measures to respond to the landscape and visual baseline context and to successfully assimilate potential development within the Site;
 - The implications of the potential development on the Green Belt; and



- The considerations of the definition of Grey Belt and the associated objectives and required contributions for development on Grey Belt.

1.2 Methodology

LVA Approach

- 1.2.1 The methodology for LVA of the potential development has been drawn from the Landscape Institute and the Institute of Environmental Management & Assessment's 'Guidelines for Landscape and Visual Impact Assessment' 3rd Edition (2013). The aim of these guidelines is to set high standards for the scope and content of LVAs and to establish certain principles that will help to achieve consistency, credibility, transparency and effectiveness throughout the assessment.
- 1.2.2 The assessment of landscape and visual effects, in common with any assessment of environmental effects, includes a combination of objective and subjective judgements. It is therefore important that a structured and consistent approach is adopted to ensure that the assessment undertaken is as objective as possible.
- 1.2.3 A landscape assessment is the systematic description and analysis of the features within the landscape, such as landform, vegetation cover, settlement pattern, heritage and cultural associations, built forms, transport patterns and land use that create a particular sense of place. A visual assessment considers visual receptors, which are the viewers of and within the landscape, and often include locations such as residential or business properties, Public Rights of Way (PRoW), public open space, and transport corridors.

Green Belt Approach

Assessment against the purposes of the Green Belt

- 1.2.4 The Site has also been independently assessed against the purposes of the Green Belt, as set out in Paragraph 143 of the NPPF, to determine the contribution that the Site makes towards the Green Belt. Those purposes considered comprise:
- *"To check the unrestricted sprawl of large built-up areas;*
 - *To prevent neighbouring towns merging into one another;*
 - *To assist in safeguarding the countryside from encroachment;*
 - *To preserve the setting and special character of historic towns; and*
 - *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*
- 1.2.5 With respect to the fifth purpose of the Green Belt *"to assist in urban regeneration by encouraging the recycling of derelict and other urban land"*, should the Site be brought forward for development it would not prejudice derelict or other urban land being brought forward for urban regeneration. However, the principle of retaining land within the Green Belt holds true for all areas within the Green Belt, therefore the Site is considered to make the



1 Introduction

same contribution to this purpose of the Green Belt as any other land parcel within the Green Belt. Accordingly, no additional specific assessment is undertaken.

- 1.2.6 The criteria for the assessment of the contribution that a Site makes to the purposes of the Green Belt, and to the ability of the remaining Green Belt, to fulfil the other four purposes, of the Green Belt, predominantly based on the NPPG 2025, is set out in Table 1.1.

Table 1.1 – Purposes of the Green Belt – Assessment Criteria

Purpose	Criteria
(a) Check the unrestricted sprawl of large built-up areas (Villages are not considered to be large built up areas or towns as per NPPG Paragraph 005)	<p>Strong: Assessment areas [sites] that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development.</p> <p>They are also likely to include all of the following features:</p> <ul style="list-style-type: none"> - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt) <p>Moderate: Assessment areas [sites] that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to):</p> <ul style="list-style-type: none"> - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences <p>Weak or None: Assessment areas [sites] that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none"> - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development
(b) Prevent neighbouring towns (not villages) from merging into one another	<p>Strong: Assessment areas [sites] that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns <p>Moderate: Assessment areas [sites] that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural



Purpose	Criteria
	<p>landscape elements or topography that preserve visual separation</p> <p>Weak or None: Assessment areas that contribute weakly are likely to include those that:</p> <ul style="list-style-type: none"> - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation
(c) Assist in safeguarding the countryside from encroachment	<p>Strong: No built or engineered forms present and perceived as inherently undeveloped and/or rural in character.</p> <p>Moderate: Built or engineered forms present but retaining a perception of being predominantly undeveloped and/or rural in character.</p> <p>Weak or None: Built or engineered forms are present, with perceptions ranging from minimally developed or rural in character to inherently developed or urban in nature.</p>
(d) Preserve the setting and special character of historic towns	<p>Strong: Assessment areas [sites] that contribute strongly are likely to be free of existing development and to include all of the following features:</p> <ul style="list-style-type: none"> - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town <p>Moderate: Assessment areas [sites] that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> - being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town <p>Weak or None: Assessment areas that make no or only a weak contribution are likely to include those that:</p> <ul style="list-style-type: none"> - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town



Assessment against the characteristics of the Green Belt

- 1.2.7 The NPPF states that the key characteristics of the Green Belt are "*their openness and their permanence*". An assessment is made of the openness of the Green Belt in the vicinity of the Site, and to what extent the redevelopment of the Site could have on the perception of openness and permanence on the Green Belt.
- 1.2.8 In addition, the relationship of the Site to existing elements and visual barriers, such as roads and areas of notable vegetation is demonstrated. This assists in the assessment of impact of potential development upon the openness of the remaining designated Green Belt and assists in the identification of boundaries that may be considered to be 'permanent'.

Table 1.2 – Definitions

Term	Definition
Brownfield	(see Previously Developed Land)
Character	A distinct, recognisable and consistent pattern of elements in the landscape that differentiates one area from another.
Coalescence	The physical or visual linkage of large built-up areas.
Countryside	In planning terms: land outwith the settlement boundary; and/or, In broader terms: the landscape of a rural area.
Defensible Boundary	A physical feature that is readily recognisable and likely to be permanent.
Encroachment	Advancement of a large built-up area beyond the limits of the existing built-up area into an area perceived as countryside.
Exceptional Circumstances	As per Paragraph 145 of the NPPF these are fully evidenced and justified circumstances for altering Green Belt boundaries through the preparation of or updating of plans.
Golden Rules	As per Paragraphs 155 and 156 of the NPPF "Golden Rules" are conditions which must be met, alongside other requirements, for major development providing housing on sites released from the Green Belt or on sites in the Green Belt, subject to a planning application. The "Golden Rules" are set out in Paragraph 156 of the NPPF.
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Greenfield	Land (or a defined site) usually farmland, that has not previously been developed.
Grey Belt	Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. Grey Belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt)



Term	Definition
	in the NPPF would provide a strong reason for refusing or restricting development.
Historic Town	A town which falls under the protection of a Conservation Area or Local Plan policies that protect their historic character and setting. An Historic Town typically has origins dating back to a significant historical period and retains a strong historic character.
Inappropriate Development	Development, which is harmful to the Green Belt, that can only be approved in “very special circumstances”, as stated in Paragraph 153 of the NPPF. Inappropriate Development exceptions are set out in Footnote 55 and Paragraphs 154 and 155 .
Large Built-up Area	An area that corresponds to the settlements identified in the relevant Local Plan, including those inset from the Green Belt.
Merging	(see Coalescence)
Neighbouring Town	Refers to settlements identified within the relevant Local Plan and those within the neighbouring authorities’ administrative boundary that abut the Green Belt.
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Openness	Openness is taken to be the degree to which an area is primarily unaffected by built features, in combination with the consideration of the visual perception of built features. In order to be a robust assessment, this should be considered from first principles, i.e. acknowledging existing structures that occur physically and visually within the area, rather than seeing them as being ‘washed over’ by the existing Green Belt designation.
Previously Developed Land	Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Sprawl	The outward spread of a large built-up area in an incoherent, sporadic, dispersed or irregular way.
Very Special Circumstances	Circumstances in which “potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”. Paragraph 153 of the NPPF. These need to be satisfied to allow planning permission for a development within the Green Belt.
Villages	Refers to settlements identified as villages within the settlement hierarchy in the relevant Local Plan.



2 Site Context

2.1 Landscape Setting

- 2.1.1 The Site is located to the north of the town of Woking, with the settlements of Chobham located approximately 2.1 miles to the west of the Site, and Ottershaw approximately 1.3 miles to the east of the Site, respectively, as illustrated on **Figure 1: Landscape and Visual Context Plan**.
- 2.1.2 The Site is predominantly located in the borough of Surrey Heath; however, the eastern extent of the Site extends into Runnymede Borough, and the southern boundary of the Site is contiguous with the northern boundary of Woking Borough, although the settlement of Woking, and associated suburbs, within the borough of Woking, is located some 1.4km south of the southern boundary of the Site, separated by a substantial swathe of permanently open land associated with Horsell Common.
- 2.1.3 The site adjoins the A319 Chertsey Road to the north and A320 Guildford Road, via Wey Farm, to the east.
- 2.1.4 Ottershaw Park, and the associated Grade II Listed Building of The Mansion, is located to the immediate north of the Site.
- 2.1.5 The Site comprises of the airport related buildings and control tower, and surrounding business park and associated hardstandings and parking in the north-west of the Site; the extensive runways, taxiways and mown grass surrounds forming part of the airfield, on the central-western part of the Site; the river meadows and woodland associated with the River Bourne, which runs predominantly along the southern boundary of the Site, with a length running through the south eastern extents of the Site; the parkland landscape and parkland trees on the eastern part of the Site, formerly associated with Ottershaw Park; and a series of fields of varying size and degree of enclosure in the central part of the Site, between the airfield to the west and the parkland landscape to the east.

2.2 Topography and Hydrology

- 2.2.1 The Site is generally located on gently sloping land, falling from higher land to the north of the Site, down to the valley to the River Bourne to the south, as illustrated on **Figure 1: Landscape and Visual Site Context Plan**. The western part of the Site appears relatively flat, particularly where associated with, and as is characteristic of, its function as an airfield. Here, the Site gently falls from approximately 30 Above Ordnance Datum in the north to a low point of 20m AOD along the River Bourne on the southern boundary of the Site. The topography of the eastern part of the Site is slightly more varied, with a localised knoll at an elevation of above 40m AOD in the vicinity of Wey Farm on the south-eastern boundary and with land rising up to over 40m AOD to the north, in the vicinity of Ottershaw Park.



2.3 Vegetation

- 2.3.1 The landscape within which the Site is located has a substantial network of woodlands, copses, tree belts (some of which are protected by a Tree Preservation Order) and parkland, throughout the valley floor and on the surrounding valley sides to the north, east, south and west, as illustrated on **Figure 1: Landscape and Visual Context Plan**.
- 2.3.2 The Site has varying degrees of vegetation cover, being generally less vegetated than that of the surrounding landscape. Much of the Site associated with the airport is devoid of vegetation, with woodland, tree belts and trees limited to the western Site boundary, and the River Bourne Valley along the southern boundary. Woodland forms the eastern boundary of the Site, with relatively sparse scattered parkland trees within the eastern part of the Site. Fields within the central part of the Site are of varying size; and are enclosed to varying extents by intermittent field boundary vegetation, scattered trees and woodland, and emerging native scrub.

2.4 Access and Connectivity

- 2.4.1 A Public Right of Way, PRoW 1 runs north – south through the centre of the Site; connecting to the A319 Chertsey Road, and the extensive wider PRoW network and areas of Open Access Land, such as Stanners Hill and Chobham Common, to the north; and connecting to the publicly accessible McLaren Park associated with the McLaren Technology Centre and the extensive areas of Open Access Land, such as Horsell Common, to the south, as illustrated on **Figure 1: Landscape and Visual Context Plan**. PRoW 3 runs south from the A319 Chertsey Road along the western boundary of the Site, again connecting with the wider network of PRoWs and Open Access Land to the north; PRoWs to the west; and extensive Open Access Land to the south.

2.5 Designations

Green Belt

- 2.5.1 The Site and surrounding area are located within the Metropolitan Green Belt. There are no other landscape designations covering the Site, and the Site falls outside the Thames Heath SPA and associated 400m buffer, but within 5km of the SPA. The previously developed land of the airport covers 49ha (32% of the Site), with the Fair Oaks airport buildings and associated business park, covering some 3.66ha. The buildings sit within a designated Major Developed Site in the Green Belt.

Heritage Features

- 2.5.2 There is only one Locally Listed Building (Woking Lodge) within the south eastern extents of the Site, located off Guildford Road, with another Locally Listed Building (Dunsford House) located just outside the south eastern extents of the Site located off Guildford Road. There are two Listed Buildings in close proximity to the Site namely the Mansion (Grade II) located



to the north set within Ottershaw Park; and the Old Farmhouse (Grade II) close to the south eastern corner of the Site, located off Guildford Road.

- 2.5.3 There are no Conservation Areas, Registered Parks and Gardens of Special Historic Interest, Scheduled Monuments or County Sites of Archaeological Importance and Areas of High Archaeological within or near to the Site.



3 Planning Context

3.1 National Policy

National Planning Policy Framework, December 2024

- 3.1.1 The National Planning Policy Framework (NPPF) outlines that “the purpose of the planning system is to contribute to the achievement of sustainable development including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner”, which is defined as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”.
- 3.1.2 The NPPF also clarifies that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions. The NPPF states that:
- “the planning system has three overarching objectives: economic, social and environmental”. The environmental objective is described as follows: “to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*
- 3.1.3 Paragraph 9 of the NPPF also notes that the objectives should be delivered through the planning process but recognises that planning policies and decisions should “take local circumstances into account, to reflect the character, needs and opportunities of each area”.
- 3.1.4 Paragraph 39 relates to decision making and states:
- “Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*
- 3.1.5 Section 11 is concerned with making effective use of land, with Paragraph 124 stating:
- “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions...”*
- 3.1.6 Paragraph 125 states that planning policies and decisions should:
- “a) Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*



b) Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production...”

c) Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and

e) Support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well- designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. They should also allow mansard roof extensions on suitable properties⁵¹ where their external appearance harmonises with the original building, including extensions to terraces where one or more of the terraced houses already has a mansard. Where there was a tradition of mansard construction locally at the time of the building’s construction, the extension should emulate it with respect to external appearance. A condition of simultaneous development should not be imposed on an application for multiple mansard extensions unless there is an exceptional justification.”

3.1.7 Paragraph 129 states that planning policies and decisions should support development that makes efficient use of land by taking account of:

“a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) Local market conditions and viability;

c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) The desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) The importance of securing well-designed attractive and healthy places.”

3.1.8 Paragraphs 130 outlines area-based character assessments design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances:



“a) Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;

b) The use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and

c) Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”

3.1.9 Section 12, Paragraphs 131-141, focus on achieving well-designed places and promote good design of the built environment. This approach is enshrined in Paragraph 135, which states:

“Planning policies and decisions should ensure that developments:

a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) Create places that are safe, inclusive and accessible and which promote health and well-being with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

3.1.10 Paragraph 136 states:

“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning



authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users."

3.1.11 Paragraph 139 states:

"Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

- a) Development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
- b) Outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings..."*

3.1.12 Chapter 13 addresses the Green Belt, with Paragraph 142 stating *"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open"* and that *"the essential characteristics of Green Belts are their openness and their permanence"*.

3.1.13 Paragraph 143 subsequently sets out the following five purposes of the Green Belt:

- "a) To check the unrestricted sprawl of large built-up areas;*
- b) To prevent neighbouring towns merging into one another;*
- c) To assist in safeguarding the countryside from encroachment;*
- d) To preserve the setting and special character of historic towns; and*
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

3.1.14 Paragraph 145 sets out that *"once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans"*.

3.1.15 Paragraph 147 addresses the exceptional circumstances required for changes to Green Belt Boundaries, stating that:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in*



minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

3.1.16 Paragraph 147 states that:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

3.1.17 In particular, Paragraph 148 goes on to state that:

“Where it has been concluded that it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

3.1.18 Paragraph 149 addresses defining Green Belt boundaries, setting out that plans should:

“a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;

b) not include land which it is unnecessary to keep permanently open;

c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

3.1.19 Paragraph 153 states that when considering any planning application

“local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness ...other than in the case of development on previously developed land or grey belt land, where development is not inappropriate [Footnote 55].”



3 Planning Context

- 3.1.20 Footnote 55 sets out the exception: *“Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate”*.
- 3.1.21 Paragraph 151 states that:
- “Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is released for development through plan preparation or review, the ‘Golden Rules’ in paragraph 156 below should apply”*.
- 3.1.22 Paragraph 153 goes on to set out that: *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”*.
- 3.1.23 In relation to proposals affecting the Green Belt, Paragraph 153 states that, when considering planning applications, *“local authorities should ensure substantial weight is given to any harm to the Green Belt, including harm to its openness”*.
- 3.1.24 Any development in the Green Belt is considered inappropriate unless it is covered by the exceptions in Footnote 55 or, as set out in Paragraph 154, it falls into one of the exception categories which are:
- a) *“buildings for agriculture and forestry*
 - b) *the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
 - c) *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
 - d) *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
 - e) *limited infilling in villages;*
 - f) *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
 - g) *limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*



- h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
- i. mineral extraction;*
 - ii. engineering operations;*
 - iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
 - vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order”.*

3.1.25 However, following from this, Paragraph 155 highlights that *“the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where”:*

- a) “The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b) There is a demonstrable unmet need for the type of development proposed;*
- c) The development would be in a sustainable location, with particular reference to [paragraphs 110 and 115 of this Framework]; and*
- d) Where applicable the development proposed meets the ‘Golden Rules’ requirements”*

3.1.26 Paragraph 156 of the NPPF stipulates where major development involving the provision of housing is proposed on sites released from the Green Belt or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made:

- a) “affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b) necessary improvements to local or national infrastructure; and*
- c) the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”*

3.1.27 Paragraph 158 goes on to state that if *“a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”.*



3.1.28 Lastly, the NPPF states at Paragraph 159:

“The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan.”

3.1.29 The 2025 NPPG update on Green Belt guidance complements the 2024 update of the NPPF providing information on the key considerations for assessing the contribution Green Belt land to Green Belt purposes and identifying grey belt. As noted in the Scope of Guidance, the 14 paragraphs contained in the NPPG set out:

- *“the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land*
- *the considerations involved in determining whether release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;*
- *guidance for considering proposals on potential grey belt land*
- *guidance on identifying sustainable locations when considering the release or development of Green Belt land*
- *updated guidance on how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, should contribute to accessible green space*
- *updated guidance on how to consider the potential impact of development on the openness of the Green Belt”*

3.1.30 It is noted in the introductory text, in relation to identification of grey belt, that *“Where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework (NPPF)”*.

3.1.31 Criteria for evaluating the contribution of Green Belt land to purposes a, b and d, are set out in NPPG Paragraph 005 Reference ID: 64-005-20250225, and these are reflected in the criteria set out at Table 1.1. The guidance clarifies that purposes a, b and d relate to large built up areas and towns and not to villages.

3.1.32 NPPG Paragraph: 006 Reference ID: 64-006-20250225 notes that where designations or policies covered by footnote 7 *“would provide a strong reason for refusing or restricting development....it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals”*.



- 3.1.33 NPPG Paragraph: 011, Reference ID: 64-011-20250225, notes how should authorities establish whether Green Belt land is in sustainable locations. It states:

“The Framework is clear that, when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location would be appropriate for the kind of development proposed. Similarly, when making decisions regarding planning applications on grey belt land, authorities should ensure that the development would be in a sustainable location. For the purpose of these decisions, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate.

Whether locations are sustainable should be determined in light of local context and site or development-specific considerations. However, in reaching these judgements, national policy is clear that authorities should consider opportunities to maximise sustainable transport solutions, as set out in paragraphs 110 and 115 of the NPPF.”

- 3.1.34 NPPG Paragraph: 012, Reference ID: 64-012-20250225 notes how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, contribute to accessible green space. It states that the following contributions to accessible green space should be considered:

- *“New residents and the wider public should be able to access good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.*
- *Accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions.*
- *Where possible access to green spaces should include safe active travel routes and should be served by public transport, which also means providing the necessary infrastructure (such as footpaths and bridleways).*
- *Proposals should consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.*
- *Where appropriate, authorities should consider the use of conditions or planning obligations. The Community Infrastructure Levy can also be used to fund improvements to existing greenspaces or the provision of new ones. Local authorities should consider arrangements for the long-term maintenance of green spaces.”*

- 3.1.35 NPPG Paragraph: 013, Reference ID: 64-013-20250225 identifies the factors that can be taken into account when considering the potential impact of development on the openness of the Green Belt. These include, but are not limited to the following:



3 Planning Context

- *“openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.”*

3.1.36 NPPG Paragraph: 014, Reference ID: 64-014-20250225 notes how harm to the Green Belt including harm to its openness should be considered if a development is not inappropriate development. It states:

“Footnote 55 to the NPPF sets out that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.

3.1.37 Chapter 15 relates to the conservation and enhancement of the natural environment.

3.2 Local Planning Policy

3.2.1 The Site straddles the administrative boundaries of both Surrey Heath Borough Council (SHBC) and Runnymede Borough Council (RBC), with nearly two thirds of the Site, the western and central extents, located within the SHBC and the eastern extent located within RBC.

Surrey Heath Core Strategy and Development Management Policies, 2012

3.2.2 The Surrey Heath Core Strategy was adopted by Surrey Heath Borough Council in February 2012. The Core Strategy is a key planning document that sets out the Council's vision, aims and objectives that will guide and determine the future pattern of development in the Borough up until 2028.

3.2.3 The vision for Surrey Heath is set out, in Paragraph 4.1, as follows:

“By 2028 residents will continue to enjoy a prosperous and high quality of life based around sustainable growth and a strong economy supporting a healthy, safe and diverse society that enjoys a high quality environment in which the natural heathland environment and character of towns and villages (with their green areas) is protected and enhanced. New development will be climate change resilient and continue to be well designed and of a high quality. This will include housing that meets the needs and aspirations of all sectors of the local community. The community will continue to have good access to high quality employment, healthcare and education. Rates of economic activity will remain high, the local community will be more active with improved access to leisure and recreational facilities and a network of green infrastructure.”



3.2.4 The policies of relevance to the Site and landscape and visual and Green Belt matters include:

- CP1: Spatial Strategy
- CP2: Sustainable Development and Design
- CP13 Green Infrastructure
- CP14A Biodiversity and Nature Conservation
- CP14B European Sites
- DM9 Design
- DM17 Heritage

Surrey Heath Local Plan 2000

3.2.5 Several Saved Policies with the Surrey Heath Local Plan, adopted in 2000, are relevant to the Site. These include:

- Policy RE17: Major Developed Sites in the Green Belt
- Policy M21: Development at Fair Oaks Airport

Pre-Submission Surrey Heath Local Plan (2019 – 2038): Regulation 19

3.2.6 The Regulation 19 submission draft of the emerging Local Plan for Surrey Heath has been issued for consultation, closing on 20th September 2024.

3.2.7 The draft policies of relevance to the Site and landscape and visual and Green Belt matters include:

- SS1: Spatial Strategy
- SS2: Presumption in Favour of Sustainable Development
- IN5: Green Infrastructure
- E2: Biodiversity and Geodiversity
- E3: Biodiversity Net Gain
- E8: Landscape Character
- GBC1: Development of New Buildings in the Green Belt
- DH1: Design Principles
- DH5: Trees and Landscaping
- DH7: Heritage Assets

3.2.8 The draft Local Plan sets out the following relevant Strategic Objectives:

- Objective A: To deliver sustainable development that contributes to meeting housing needs, providing new homes of an appropriate mix and tenure, including specialist housing needs.
- Objective D: To ensure that development within the Borough is supported by the necessary physical, social and green infrastructure to meet the needs of future Surrey Heath residents.
- Objective E: To ensure that development does not have a detrimental impact on the Borough's environmental assets including designated international and national sites, landscape character, water quality and biodiversity and that new development delivers biodiversity and environmental net gains and contributes to restoring habitat and ecological connectivity.



- Objective I: To protect the character and purpose of the Green Belt and the character of the Countryside beyond the Green Belt.
- Objective J: To conserve and enhance the Borough's built environment and heritage assets, both designated and non-designated.
- Objective K: To promote healthy, sustainable, and cohesive local communities through good design, and access to homes, employment, community and recreational facilities.

3.2.9 With regard to Landscape Character, Policy E8 states that:

"1) Development proposals will be permitted which respond to, and wherever possible enhance, the special character, key positive landscape attributes, value and landscape setting of settlements.

2) Development proposals should demonstrate that:

a. they can integrate with, and positively contribute to the landscape character of the area;

b. they are sited and designed so as to avoid any adverse impact on key positive landscape attributes identified in the Surrey Landscape Character Assessment and the Surrey Heath Landscape Sensitivity Assessment;

c. they are sited and designed to minimise landscape and visual impacts, in line with the analysis, guidance and strategies provided in the Landscape Character Assessment and Landscape Sensitivity Assessment;

d. they consider cumulative impacts with other existing and proposed development;

e. there is no adverse impact on historic landscapes and registered parks and gardens; and

f. they respect the role the landscape plays in the setting of settlements as set out in relevant landscape sensitivity or other study.

3) Where development proposals will have an impact on the landscape, a comprehensive landscaping proposal to show how the development would successfully integrate with the landscape and surroundings will be required.

3.2.10 In order to better understand the relative sensitivity of the Surrey Heath's landscapes to residential development and identify opportunities for enhancement, the Council commissioned a strategic scale Landscape Sensitivity Assessment (2021) (LSA) for land outside settlements in the Borough. The LSA study *"provided evidence of the underlying character of the landscape highlighting aspects of the landscape which are sensitive to future change and set out management guidelines for each of the character areas. The study assessed the landscape sensitivity as a measure of the resilience, or robustness, of a landscape to withstand specified change without undue negative effects on the landscape and visual baseline and their value"*.

3.2.11 The LSA noted that "development proposals should take account of the landscape sensitivities and key positive landscape attributes of the site and surrounding area at an early stage of design. Proposals should strengthen and enhance landscape character and local distinctiveness wherever possible", and that "proposals will be considered on a site by site basis based on their own merits, however they should ensure that any new landscape



components are in character with the locality, form part of a coherent green infrastructure network and provide ecosystem services”.

3.2.12 With regard to Green Belt and Countryside, Policy GDC1 states that:

“1) The development of new buildings within the Green Belt will be permitted where they are consistent with the exceptions listed in national planning policy and the requirements of this policy.

2) Where new buildings are proposed to replace buildings that are not lawful or are temporary in nature, the loss of these will not be taken into account in assessing the proposal.

3) Inappropriate development will not be permitted unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

Proposals relating to Replacement Buildings

4) In assessing whether proposals for replacement buildings are materially larger than those they are to replace, regard will be had to the impact upon the Green Belt of the visual and spatial characteristics of the development, including:

a. the bulk, mass, volume, height and distribution of the proposed building, together with any other structures and hardstanding compared against that it is to replace;

b. the siting or the position of the proposed building, which should substantially overlap that of the original building, unless it can be clearly demonstrated that an alternative position would not increase the overall impact upon the openness of the Green Belt.

5) The replacement of an existing building with a building in an alternative use will only be considered where very special circumstances can be demonstrated that outweigh harm to the Green Belt, in line with criterion 3.

Proposals affecting Previously Developed Land

4) [sic] In assessing proposals for the partial or complete redevelopment of previously developed land, regard will be had to the resultant impact upon the openness of the Green Belt arising from the changes between existing and proposed development, taking account of:

a. the existing and proposed bulk, mass and volume of the development;

b. the general height and storeys of existing and proposed buildings, structures and hardstanding and their disposition around and within the site.

Limited Infilling

5) [sic] Limited infilling will only be acceptable within the Green Belt outside of defined settlement areas as designated on the Policies Map where it can be demonstrated that the site is considered to be within the village.



Other development

6) [sic] Certain other forms of development are also considered not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, and these are listed in the NPPF.

Green Belt Studies / Appraisals

3.2.13 Over 44% of land within Surrey Heath is designated as Metropolitan Green Belt. As a strategic policy of land use constraint covering nearly half of the Borough, this designation is a key consideration in the development of the new Local Plan, particularly as the Council gives consideration as to the degree to which the emerging Plan is able to meet identified needs in a way that is consistent with the policies of the NPPF. The Surrey Heath Green Belt Review (2022) forms part of the Evidence base for the emerging Local Plan, and has been published alongside the Regulation 19 Local Plan consultation.

3.2.14 The Site, and its locality, has previously been the subject of Green Belt review and assessment for Surrey Heath Borough Council in 2017, and the Surrey Heath Local Plan Appraisal of Sites - Green Belt Sites in 2018.

3.2.15 With regard to the 2017 Green Belt Review, the 2022 Green Belt Review notes that:

“In 2017, Surrey Heath Borough Council undertook a high-level appraisal of how the Green Belt and countryside beyond the Green Belt within Surrey Heath was functioning against purposes 1 – 4 of the Green Belt as set out within Paragraph 138 of the NPPF. The Green Belt and Countryside Study concluded that whilst nearly all of the Green Belt and countryside beyond the Green Belt within the borough functioned against the purposes of the Green Belt as set out within the NPPF, there are some areas which did not function, or did not function well against the purposes of the Green Belt.”

3.2.16 With regard to the 2018 Green Belt Review, the 2022 Green Belt Review notes that:

“In 2018, Land Use Consultants (LUC) undertook an independent appraisal of potential housing sites outside of Surrey Heath’s defined settlement areas, including those situated within the Green Belt and the countryside beyond the Green Belt. The Surrey Heath Sites Appraisal did not set out if sites should be released from the Green Belt, nor did it identify ‘exceptional circumstances’ for the release of land from the Green Belt. The study was part of the evolving evidence base to assist with the preparation of the Local Plan and the decision-making process and sought to support the development of the Draft Local Plan Issues and Options Consultation.”

3.2.17 The 2022 Green Belt Review then goes on to note that:

“In view of the limitations to the existing studies as set out above, it is recognised that further, up-to-date and more detailed evidence is required to enable the Council to fully understand how the Green Belt within Surrey Heath functions and what the implications will be for the wider Green Belt in the event that land is released from its extent. This Review will provide this evidence, which will be considered in conjunction with other background evidence to conclude on whether there are exceptional circumstances to



warrant an alteration to Green Belt boundaries at both high level and local levels.”

- 3.2.18 The locations and boundaries of the Green Belt assessment areas covered by the associated Green Belt reviews and assessments are shown on **Figure 2: Green Belt Assessment Areas Plan**.

Surrey Heath Green Belt and Countryside Study (2017)

- 3.2.19 The Surrey Heath Green Belt and Countryside Study (GBCS) seeks to provide an appraisal of how the Green Belt within Surrey Heath is functioning against purposes 1 – 4 of the Green Belt as identified within Paragraph 143 of the NPPF. It should be noted that the assessment does not examine the function of the Green Belt against Purpose 5 of the Green Belt, which indicates that the Green Belt should “*assist in urban regeneration, by encouraging the recycling of derelict and other urban land*”.
- 3.2.20 Green Belt **Parcel Area G52** is relevant to the Site, being a large parcel of land situated to the south of Chertsey Road and east of Philpot Lane, with the River Bourne bounding the Parcel Area to the south. Parcel Area G52 comprises open fields with areas of farmsteads, dwellings and horticultural nurseries. Set centrally to the Parcel Area is the Fair Oaks airport complex, comprising a collection of single and two storey buildings of varying scales located in close proximity to the Chertsey Road and Youngstroat Lane, together with hardstanding, grassed areas and the associated runway. The study recognises the differing character of Green Belt Parcel Area 52, thereby subdividing it into three sub areas the areas for individual assessment – **Parcel Areas G52a, G52b and G52c**.
- 3.2.21 Regarding Purpose 1 the study notes that “Parcel G52 is not adjacent or close to a defined large, built-up area and does not provide a zone of constraint to the sprawl of such an area”.
- 3.2.22 Regarding Purpose 2 it is noted that “Land within Parcel G52b is considered to make only a limited contribution to the gap between settlements, being extensively built up and alongside land at Chobham Business Centre, interrupting the otherwise broad gap between Chobham and Ottershaw and Chobham and Woking”.
- 3.2.23 Regarding Purpose 3 it is noted that: “Parcel G52b contains Fair Oaks Airport. The north easternmost part of the Parcel comprises a collection of single and two storey buildings of varying scales in aviation and commercial use, surrounded by extensive hard standing. The features are urbanising in character and have a significant impact upon the openness of the Green Belt in this location. The remainder of the Parcel is principally comprised of grassed areas, notwithstanding tarmacked (sic) areas in use as a runway and taxiways. Owing to the relatively flat and open character of the remainder of the Parcel, the adjoining commercial/aviation complex brings an urbanising influence to this area”.
- 3.2.24 The detailed commentary relating to Green Belt Parcel 52 is set out in in Appendix C. The Summary Table of Findings in Annex 4 of the Study states:

“Parcel G52 is not considered to function against Purposes 1 and 4, owing to its distance from identified large built-up areas and historic settlements. As a result of significant variation in respect of the degree to which land within Parcel G52 fulfilled Purposes 2 and 3, the Parcel was subdivided into three



for assessment purposes. Parcels G52a and G52b were considered to function moderately to strongly against Purposes 2 and 3 owing to their open, countryside character and the contribution the Parcels make to preventing development in the gap particularly between Chobham and Ottershaw, which has been undermined in some areas. Owing to its developed character, Parcel G52b was considered to function weakly against Purposes 2 and 3, compromising openness along key routes between settlements.”

- 3.2.25 The Surrey Heath GBCS goes on to state in the ‘Other comments’ section:

“Parcel G52 falls at the periphery of the Borough and the eastern boundary of this Parcel is artificially defined by the Borough boundary. Were the eastern boundary of the Parcel not defined by the Borough boundary and the methodology for the subdivision of land Parcels rigidly applied, Parcel G23 [that is Parcel G52] (Sic) would incorporate land within Runnymede. For this reason, the findings of this Study are cross-referenced against the findings of the Runnymede Green Belt Review 2014 as this study provides a comprehensive review of all Green Belt land within the Borough. Land within Runnymede [reference General Area 27] that is associated with Parcel G23 [that is Parcel G52] (Sic) is classified under the terms of the Runnymede study as making little to no contribution to Purposes 1 and 2 but makes a significant contribution to Purpose 3. The findings of both the Runnymede and Surrey Heath studies reached common conclusions in respect of Purposes 1. In respect of Purpose 2, the assessment, it is noted that there are subtle differences in how each assessment has been approached. Some differentiation is noted in respect of Purpose 3, with land in Runnymede considered to similarly to some parts of Parcel G52. The Runnymede assessment would not have had regard to development within Surrey Heath.”

- 3.2.26 The Surrey Heath GBCS acknowledges the differing contributions the large land parcel makes towards the purposes of the Green Belt and refers to cross border assessments for completeness, accepting that Runnymede Borough Council’s Green Belt Review (2014) reached common conclusions in respect of Purposes 1 (Checking unrestricted sprawl), but accepting there are subtle differences between how the assessments have been approached in relation to Purpose 2 (Preventing neighbouring towns from merging) and noting differentiation in respect of Purpose 3 (Safeguarding the countryside from encroachment). Putting this aside, sub-area 52b (which contains the main area of Fairoaks Airfield) is considered to make only a limited contribution to the gap between settlements, being extensively built up and, alongside land at Chobham Business Centre, interrupting the gap between Chobham and Ottershaw and Chobham and Woking. The study also notes that the collection of single and two storey buildings of varying scales in aviation and commercial use, surrounded by extensive hard standing are urbanising in character and have a significant impact upon the openness of the Green Belt in this location.
- 3.2.27 Although the Green Belt and Countryside Study 2017 offers a useful overview of how well non-urban land within Surrey Heath functioned at that time against the purposes of the Green Belt as defined in the NPPF, the study was undertaken at a strategic level and stops short of providing any indication on the level of harm that could arise to the wider Green Belt if land is released. It is also noted that, the Surrey Heath Sites Appraisal 2018 related to sites identified within the Surrey Heath Strategic Land Availability Assessment 2017; as a result, the study is considered out of date.



- 3.2.28 Relevant extracts of the Surrey Heath Local Plan Appraisal of Sites: Green Belt Sites are included in **Appendix A**.

Surrey Heath Local Plan Appraisal of Sites - Green Belt Sites (2018)

- 3.2.29 Surrey Heath Local Plan Appraisal of Sites - Green Belt Sites prepared by LUC March 2018, was undertaken to review the sustainability of a number of potential development sites outside of Surrey Heath's defined settlement area but within the Green Belt that may be suitable for housing.
- 3.2.30 Large parts of the Site align with Green Belt Area ref: CH011 Fair Oaks Airport. The detailed information relating to Green Belt Area ref: CH011 Fair Oaks Airport is included in Appendix D. As shown on **Figure 2: Green Belt Assessment Areas Plan**, the Site additionally covers land between Bonsey's Lane and Ottershaw Park to the south of Chertsey Road, partly within Surrey Heath District, and partly within Runnymede District. Also not covered by CH0011 is an area surrounding Decoy Plantation to the south of The Wey Farm, and to the north of the McLaren Centre, which connects the Site to the A320 Guildford Road. This is within Runnymede District.
- 3.2.31 The appraisal states in para 4.3:
- "Fair Oaks Airport (CH011) is located the furthest from existing settlements and scores poorly in terms of proximity to all existing services. However, as the largest potential housing site under consideration, development would need to support the required provision of new services, subject to viability. This is discussed further in Chapter 5."*
- 3.2.32 The justification for this is then set out in Chapter 5 – Achievability. In the section titled 'Achievability of residential development at each site' para 5.135 to 5.135 it states:
- "5.133 Maximum number of homes at 30dph: 2,037 within the Surrey Heath portion of site (the only part of site being considered for housing provision for the purposes of this study) however, other constraints are likely to further limit the capacity of the site, as set out below.*
- 5.134 Site positives: A significant number of homes could potentially be accommodated on the site. The site is not affected by constraints relating to local nature reserves, TPOs, open spaces or agricultural land. Although it is poorly located in terms of existing infrastructure and services, it has the potential to provide significant on-site services, effectively as a new settlement.*
- 5.135 Potential issues and measures to overcome them: There is a watercourse along the southern boundary. The southern fringe of the site is constrained by functional floodplain, where residential development would be unsuitable, and areas of Flood Zone 2 and 3a, where development would only be achievable subject to the sequential and exception tests."*
- 3.2.33 It goes on to state in paras 5. 141 to 5.142:
- "5.141 With regard to Green Belt, despite the presence of commercial buildings, the central airfield part of the Site (G52b) makes a weak contribution to Purpose 2 and a moderate contribution to Purpose 3 of the Green Belt. Open land to the northeast (G52c) and south (G52a) has a more*



rural character and makes a stronger contribution to Green Belt purposes. G52c makes a strong contribution to Purpose 2 and Purpose 3 and G52a makes a moderate contribution to Purpose 2 and strong contribution to Purpose 3.

5.142 The site, excluding the large area designated as Flood Zone 3b, is not close enough to existing settlements to have good access to any services and scores poorly in terms of access to local employment areas, shopping areas, schools, transportation, health facilities and leisure facilities. Small-scale development at this site would therefore be unsustainable. However, a scale of development at the site that would effectively result in a new settlement would be able to support the provision of new services, although this would affect the overall capacity of the site."

- 3.2.34 The appraisal considers the "*Potential issues and measures to overcome them*" and "*Site positives*" of Green Belt Area ref: CH011 Fairoaks Airport, and acknowledges the Site is better suited to a larger scale development more conducive of a new settlement and that the lack of existing infrastructure and services can be effectively offered on Site as part of a new settlement, noting at Para 5.142 that "*a scale of development at the site that would effectively result in a new settlement would be able to support the provision of new services, although this would affect the overall capacity of the site*".
- 3.2.35 Relevant extracts of the Surrey Heath Local Plan Appraisal of Sites: Green Belt Sites are included in **Appendix B**.

Surrey Heath Local Plan Preferred Options 2022: Green Belt Review, (Main Document) January 2022

- 3.2.36 The Land Parcels considered in the 2022 Green Belt Review are identified on Figure 3: Land Parcels for Assessment, at Page 24, with the Site in part covered by PDL2: Fairoaks Airport, which broadly aligns with the extent of Fairoaks airport.
- 3.2.37 Part 1 of the 2022 Green Belt Review provides an assessment of the parcels against the purposes of Green Belt as set out in the NPPF. Table 1 sets the Criteria for Assessment against Purpose 1, on Page 28; Table 3 sets out the Assessment Criteria for Purpose 2 on Pages 33 and 34; Table 4 sets out the Assessment Criteria for Purpose 3, on Pages 36 and 37; and Table 5 sets out the Assessment Criteria for Purpose 4, on Pages 38 and 39.
- 3.2.38 With regard to Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land, the 2022 Green Belt Review notes that:

"The complexity arising from the interplay of these varied factors in the relationship between the Green Belt and countryside in Surrey Heath and its neighbouring urban areas mean that spatial analysis based on the supply of brownfield land relative to the locations of individual parcels would either be overly simplistic or would be based on significant assumptions such as to place the results in significant doubt.

In view of these issues, it has been considered that there is no appropriate means to establish with certainty the degree to which each parcel assists in urban regeneration on a parcel-by-parcel basis ..."



3 Planning Context

3.2.39 Part 2 makes a qualitative assessment using planning judgement and the findings of the Part 1 assessment to give consideration as to the degree to which the release of each land parcel could affect the integrity and long-term protection of the wider Green Belt, in the event of its release.

3.2.40 The 2022 Green Belt Review sets out that:

“The release of a parcel upon the integrity of the wider Green Belt is more likely to be limited where:

- The parcel would effectively be infill, with the parcel already enclosed by, or closely associated with the urban area;*
- The parcel is well contained by the landscape;*
- A strong boundary could be created where there is robust distinction between rural and urban areas.*

Conversely, the release of a parcel upon the integrity of the wider Green Belt is more likely to be detrimental where:

- The parcel would result in the increased containment of open Green Belt land, which could lead to future pressure for release;*
- The parcel is not well contained by the landscape;*
- The release of the parcel would result in the creation of a more diffuse boundary, where rural and urban areas are, or could be, less discernible from each other. For example, going from a strong boundary to a weaker boundary where there is perceived to be little opportunity to establish a robust boundary, or moving a boundary to a location where proximity to development uncharacteristic of the Green Belt would lead to the appearance of sprawl.”*

3.2.41 The Criteria for the Wider Impact Assessment is set out in Table 6, on Page 43.

3.2.42 PDL2: Fair Oaks Airport, which covers part of the Site, with regard to the purposes of Green Belt is assessed as:

- Purpose 1: None
- Purpose 2: Weak
- Purpose 3: Weak
- Purpose 4: None

3.2.43 PDL2: Fair Oaks Airport is assessed as having a rating of Low Function, when considering the overall combined contribution to the purposes of the Green Belt.

3.2.44 With regard to the Part 2 Assessment: Wider Impact Study, PDL2: Fair Oaks Airport is assessed as being of Higher Risk to wider Green Belt

3.2.45 The criteria or definition of Higher Risk to wider Green Belt is set out as:

“The parcel does not relate closely with a settlement;

Or a combination of the following:



Development within the parcel would result in the increased containment of open Green Belt land;

The parcel is not well contained by the landscape;

The release of the parcel could result in a more diffuse boundary where rural and urban areas are, or could be less discernible from each other."

3.2.46 The 2022 Green Belt Review goes on to note, at Paragraph 4.39, that:

"Because all Previously Developed parcels are located some distance from neighbouring settlements, it was not considered that there was any way in which to lessen the risk of release to the wider Green Belt by these were, by virtue of the assessment criteria, considered as posing a higher risk to the integrity of the Green Belt in the event of release in conjunction with other Green Belt land under the terms of the assessment."

3.2.47 The 2022 Green Belt Review concludes, at Paragraph 5.12, that:

"It is important to note that the most sustainable areas of the Green Belt, or those areas that are most suitable for development, are those that will result in the highest harm to the Green Belt in the event of their release. Planning judgement will therefore be required to draw to a conclusion on whether the sustainability benefits and suitability of Green Belt release and the associated development outweigh the harm to the Green Belt designation."

3.2.48 Paragraph 5.13 goes on to qualify that:

"In view of this, when considering the risks and benefits of removing land from the Green Belt at the local level, consideration should be given to whether potential harm to the Green Belt can be reduced or ameliorated. This will be particularly relevant to cases where land identified within this Study has been identified as having a high level of function against the Green Belt purposes and/or a high risk to the integrity of the wider Green Belt in the event of its release. The extent to which harm can be mitigated will vary from site to site and will depend on the specifics of each case. Mitigation may include (but is not limited to):

- Addressing the nature of the boundary at the point at which rural and urban areas meet – for example, boundaries could be strengthened, and new landscaping integrated at weak points to reduce opportunities for sprawl and to enable a clear distinction between rural and urban areas;*
- Release of smaller or larger areas of land may result in more effective containment of development or more robust boundaries;*
- Considering the ownership and management of landscape elements – for Surrey Heath, requirements to provide Suitable Alternative Natural Green Space may provide an opportunity to secure areas of open land and would offer greater security of landscape features and screening beyond land in private ownership (for example, in back gardens); and,*
- Using building scale and density to create a transition from urban to rural in order to reduce the perception of urbanisation.*



3 Planning Context

3.2.49 Paragraph 5.14 notes that the Council's Landscape Sensitivity Assessment provides useful evidence which will assist in identifying site specific opportunities for mitigation of harm.

3.2.50 In addition, Paragraph 5.15 notes, with reference to [the previous NPPF 2023, now superseded] Paragraph 145 of the NPPF, enhancing the beneficial uses of the Green Belt, that:

“Consideration of the opportunities provided by each release to enhance the beneficial use of the Green Belt should be factored into decision making in respect of where to amend Green Belt boundaries. This is a requirement of the National Planning Policy Framework (NPPF), which advises at Paragraph 145:

3.2.51 As set out in Table 7 Of the 2022 Green Belt Review, this would include:

- Improving access;
- Providing locations for outdoor sport;
- Retaining and enhancing landscape and visual amenity;
- Increasing biodiversity;
- Climate Change mitigation and adaptation; and
- Improving damaged and derelict land.

Paragraph 151 of the NPPF, December 2024, now states that:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is released for development through plan preparation or review, the ‘Golden Rules’ in paragraph 156 below should apply.”

Surrey Heath Green Belt Review Addendum and Additional Assessment (2023)

3.2.52 Following the Regulation 18 consultation a number of concerns were raised in respect of the Surrey Heath Green Belt Review 2022, specifically in relation to:

- The omission of assessments for potential Gypsy and Traveller sites;
- That the methodology should not have excluded sites within the 400m buffer zone of the Thames Basin Heaths Special Protection Area, which although unsuitable for C3 residential development, may be suitable for other uses such as employment and C2 development, which should be considered for release from the Green Belt.
- That all Green Belt land should have been included within the Green Belt Review.
- Concerns regarding the conclusions reached in some assessments.

3.2.53 Consequently, the methodology of the Green Belt Review has been revised and, where appropriate, additional parcels of land have been assessed while the previously undertaken work has been reviewed and updated to reflect the change in methodology. However, PDL2 (within which the Site lies) remains unchanged.



Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19) Green Belt Exceptional Circumstances Topic Paper

- 3.2.54 The Topic Paper has set out the specific factors that the Council considers amount to the 'exceptional circumstances' needed to justify the amendments to the Surrey Heath Green Belt boundary that are proposed through the Pre-Submission Local Plan, including:
- 3.2.55 The purpose of this Topic Paper is to set out in clear terms the specific factors that the Council considers amount to the 'exceptional circumstances' needed to justify the amendments to the Surrey Heath Green Belt boundary that are proposed through the Pre-Submission Local Plan. The main areas covered by this topic paper are:
- An overview of relevant national planning policy and practice;
 - The Green Belt within Surrey Heath;
 - The case for Green Belt release in the Regulation 19 Pre-Submission Local Plan; and,
 - Conclusion.
- 3.2.56 In the absence of a definition of exceptional circumstances in national policy, SHBC have relied on case law considerations to determine whether the release of Green Belt in each instance was appropriate.
- 3.2.57 It is considered that this approach is justified, and responds to both the requirements of national policy as set out within the NPPF 2023 and the results of the Council's evidence base.
- The release of land to help meet identified needs for Gypsy and Traveller accommodation;
 - The inseting of Chobham within the Green Belt; and,
 - The release of land to provide a defensible and logical boundary at Longcross Garden Village.

Runnymede Borough Council Green Belt Review (2014)

- 3.2.58 As the eastern extents of the Site extend into Runnymede, the Runnymede Borough Council Green Belt Review (2014), undertaken by Arup, has been referred to, which considered whether the Green Belt still meets its purposes and whether alterations to boundaries could be made, forming part of the evidence base for the Local Plan.
- 3.2.59 The eastern extents of the Site falls within the General ID Area 27 as defined in the RBC's Green Belt Review (2014), as illustrated on **Figure 2: Green Belt Assessment Areas Plan**; and which covers an area of land, of 146.1ha, extending from the intersection of the Runnymede and Surrey Heath administrative boundaries (which cuts broadly north-south across the Site); the intersection of the Runnymede and Woking administrative boundaries (along the southern boundary of the Site) and extending north up to the A219, east to the A329 and north east to the settlement edge of Ottershaw, encompassing Ottershaw Park.
- 3.2.60 The detailed commentary relating to the scoring for General ID Area 27 against the purposes of the Green Belt can be seen in Appendix D. An overview of the Green Belt Review (GBR) is set out below:



3 Planning Context

- Purpose 1 – To check the unrestricted sprawl of large built-up areas
- Criteria 1 - Protects open land contiguous to or within close proximity to a large built up area = Score 0/5.
- Criteria 2 - Prevents sprawl of a large built up area where development would not otherwise be restricted by a durable boundary = Score 0/5.
- The total score equating to 0/10.
- Purpose 2 – Prevents development that would result in a merging of or significant erosion of gap between neighbouring towns and villages or between villages including ribbon development along transport corridors that link settlements = Score 1/5.
- The justification for this score is it:

“Forms part of a wider, less essential gap between Ottershaw and Woking to the south. Prevents ribbon development along the A320. The gap is of sufficient scale that development would be unlikely to result in the merging of the settlements.”

- Purpose 3 - Protects the openness of the countryside and is least covered by development = Score 5/5.
- The justification for this high score is:

“The land parcel has a largely open character, although Ottershaw Estate lies adjacent to the A319, and there are some dispersed farm buildings in the south east. Less than 10% of the land parcel is covered by development.”

3.2.61 The Runnymede GBR goes on to assess the General Areas against a series of absolute constraints, primarily floodplain and formal statutory designations. Any land covered by an absolute constraint was discounted as a potential location for release from the Green Belt and did not undergo further assessment. The remaining General Areas, (or parts thereof), were assessed against non-absolute constraints to identify more and less preferential parcels of land for development. Any land covered by a significant non-absolute constraint, was considered less preferential for development, and did not undergo any further assessment.

3.2.62 The Runnymede GBR identified that General ID Area 27 is affected by the following:

Absolute Constraint:

- Flooding - A narrow strip of land along the River Bourne, parallel with the southern boundary of the land parcel, lies within the functional flood plain;
- Ancient Woodland - Parts of the Ottershaw Park Estate, in the north west of the area, are designated as Ancient Woodland;
- SANG - Part of Ottershaw Park, in the north east of the land parcel, is an identified SANGS.
- **Significant Non-Absolute Constraints:** Flood Zone 3a, open space and steep topography cover some of the refined land parcel; however, the remainder of the area is not subject to such constraints and therefore may be more preferential for development.
- **Recommendation:** Consider further for potential Resultant Land Parcels.

3.2.63 It goes on to state in the Assessment of Further Refined Land within General Area – Annex Report 4 of the Runnymede GBR, as set out in Appendix D, that:

“A significant swathe of further refined land remains within the General Area. There may be scope for development of the two small areas which are adjacent to the urban area of Ottershaw. However, while they would not significantly compromise Purposes 2 and 3, they would not be natural extensions to the settlement and, furthermore might create urban sprawl due to the lack of permanent durable boundaries (Purpose 1). Development in



3 Planning Context

Ottershaw Park and south of here would compromise the ability of the Green Belt to meet Purpose 3 by risking the fragmentation of an area of Green Belt which currently possesses a rural character and a low level of built form. Development might also risk ribbon development along Chobham Road (A319) and Guildford Road (A320) potentially compromising the ability of the Green Belt to meet Purpose 2."

3.2.64 Notwithstanding the low scores against purposes 1 and 2 of the Green Belt and the limited absolute constraints and limited significant non-absolute constraints within this area, General ID Area 27 was recommended for continued retention within the Green Belt in its entirety based on the scoring for purpose 3 of the Green Belt in relation to openness of the countryside and relative low density of existing development.

3.2.65 Relevant extracts of the Runnymede GBR are included in **Appendix C**.

Fairoaks Garden Village Hybrid Planning Application (2018)

3.2.66 A Planning Application for Fairoaks Garden Village, submitted in 2018, covered the same extent as the Site as that assessed in this LVA. A Green Belt Assessment was carried out, by CBRE, in support of the Planning Application. The CBRE Green Belt Assessment also reviewed the RBC and SHBC Green Belt Reviews; and provided an assessment of the contribution of the Site to Purposes 1, 2 and 3 of the Green Belt, as set out in the NPPF.

3.2.67 The CBRE Assessment concluded that the Site makes no contribution to Purpose 1 or 2 of the Green Belt; and that, in "balancing the presence of some built form; the existence of the operational airfield; and the presence of a natural landscape character of large part of the Site (east and south), it is considered that on balance, the Site possesses a largely rural open character" and concluded that the Site makes a moderate contribution to Purpose 3 of the Green Belt. The Site was not considered to contribute to Purposes 4 and 5, and therefore, overall, the Site was considered to make a weak contribution to the five purposes of including land within Green Belt.

3.2.68 In recognition that the Site has varying characteristics, and this will result in different contributions to the purposes of Green Belt, the CBRE Assessment evaluates the Green Belt sensitivity to development and potential harm across the Site. The CBRE Assessment concludes that *"harm to the poorer quality Green Belt, and the limited 'other harm', is outweighed by the positive benefits of the development – which are in the public interest, and which are therefore 'very special circumstances'";* and stating that the proposals for the Site, which concentrated development on the previously developed part of the Site, would *"redefine the Green Belt in this location, making efficient use of 49 hectares of previously developed land and enhancing and protecting the remaining Green Belt in perpetuity for the enjoyment of the local and wider community and for the benefit of local wildlife",* with the *"substantial benefits and enhancements arising from the proposals provide a clear case for very special circumstances for development in the Green Belt, and which "would outweigh harm caused to the Green Belt".*

3.2.69 Section 7: Green Belt Review provides an independent Green Belt Assessment of the Site; and summarises the findings of the Runnymede and Surrey Heath Green Belt Reviews, and



the Green Belt Review accompanying the Planning Application for Fair Oaks Garden Village, for comparison.

- 3.2.70 Section 8: Development Potential and Landscape Strategy sets out how proposals for the Site have been brought forward, taking into account the relative contribution different parts of the Site make to the character, purposes and objectives of Green Belt. Section 8 also sets out a Landscape Strategy for the Site, demonstrating how the proposals respond to the landscape and visual context of the Site; and in particular responding to the varying landscape character across the Site, retaining key landscape characteristics and taking into account relevant strategies and guidance as defined and set out in published landscape character assessments.



4 Landscape Character

4.1 Overview

- 4.1.1 Landscape character is the combination of physical, perceptual, cultural and historic features of a particular area which together create the unique and distinctive experiential qualities of a given landscape.
- 4.1.2 Landscape Character Assessment is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country. This approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF.
- 4.1.3 This section of the LVIA describes the characteristics and landscape management guidelines of Landscape Character Areas (LCAs) identified in Landscape Character Assessments at national, regional and local level that are relevant to the Site and the study area. Only those LCAs considered to have the potential to experience appreciable effects as a result of the Proposed Development are included in this assessment.
- 4.1.4 The description and key characteristics of each LCA are used as a basis for evaluation in order to inform proposed mitigation of landscape and visual effects and to make judgements on the significance of those effects. The extent of published LCAs in the vicinity of the Site are illustrated on **Figure 1: Landscape and Visual Context Plan**, with relevant information summarised below.

4.2 National

- 4.2.1 As part of Natural England's responsibilities in delivering the Natural Environment White Paper, Biodiversity 2020 and the European Landscape Convention, Natural England has developed a series of National Character Area (NCA) Profiles. These NCA Profiles provide a broad range of information including an outline of the key characteristics of a given area, a description of the ecosystem services provided and how these relate to people, wildlife and the economy, and an array of opportunities for positive environmental change.
- 4.2.2 The site lies in the eastern portion of the Thames Basin Heaths National Character Area (NCA 129). Key characteristics of the Thames Basin Heaths NCA are stated as:
- *"Plateaux of Tertiary sands and gravels in the London Basin, with intervening river valleys floored by London Clay. In the far west, Chalk forms the Hampshire Downs escarpment and the river beds of the Kennet and Pang.*
 - *High woodland cover, offering an array of colour in the autumn. Conifers and large plantations on former heathland are dominant features in the east, while the west is scattered with small, semi-natural woodlands on ancient sites.*



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- *Acid, leached soils mean that farming on the plateaux is limited to rough pasture, and that alternative land uses (such as forestry, golf courses and horse paddocks) have emerged. Heather, gorse, oak and birch all thrive here. Arable land and improved pasture are found in the valleys, on alluvium.*
- *Beyond the large areas of heathland and woodland, there is a patchwork of small to medium-sized fields with woods. The legacy of historic hunting forests includes veteran trees, ancient woods, ancient hedgerows and parklands. Historic meadows remain as fragments along watercourses.*
- *Prehistoric earthworks such as barrows and hill forts mark promontories on the plateaux. Archaeology is well preserved on historic heathland. Mosaics of open heathland and grassland with scrub, secondary woodland and plantation. Valley bogs, ponds and streams enhance diversity. Large, continuous mosaics are found in the east: they include Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), and Chobham Common National Nature Reserve (NNR).*
- *Historic commons offer tranquillity and unenclosed views, while other rights of access are enjoyed across farmland, canals and downland. Ministry of Defence ownership restricts (but does not entirely prevent) public enjoyment.*
- *'Churring' nightjars, dragonflies and purple heather are all readily identified with heathland. The Thames Basin Heaths SPA protects internationally important populations of woodlark, nightjar and Dartford warbler.*
- *Valley floors are wet with ditches, numerous watercourses, ponds, waterfilled gravel pits, reedbeds and carr. Historic features include mills, relict water meadows, and canals such as the River Wey Navigations.*
- *20th-century conurbations, including Camberley, sprawl along the Blackwater Valley, with associated roads (including the M3) dissecting heathland and woodland into blocks. Elsewhere, there are winding lanes and historic dispersed villages and farmsteads of traditional, locally-made brick and tile."*

4.2.3 A series of environmental opportunities are noted and include:

- *"SEO 1: At a catchment scale, manage and create woodlands, highway verges, field margins, reedbeds and other features in urban and rural settings to intercept run-off and to filter pollutants. In the heavily developed flood plains of the Blackwater and Thames, adapt the urban environment to manage floodwaters, and restore or enhance modified watercourses.*
- *SEO 2: Maximise the variety of ecosystem services delivered by wooded features – from wet woodlands in the Kennet Valley to the large conifer plantations around Camberley and new woodlands. Conserve soils, water, biodiversity and the sense of place and history; enhance timber and biomass production; and provide for recreation and tranquillity as appropriate.*



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- *SEO 3: Enhance the sense of history and biodiversity by conserving, restoring and building the resilience of long-established habitats such as heathland, ancient woodland and meadows, and of archaeology such as hill forts. Work at a landscape scale to conserve and restore key attributes of the historic hunting forests (such as Eversley) and historic common land. Engage the public in enjoying this heritage.*
- *SEO 4: With a focus on the Blackwater Valley, Newbury and nearby major settlements such as Reading, provide good-quality green infrastructure (incorporating commons, woodlands and restored gravel pits) to facilitate people's sustainable engagement with the local landscape. In doing so, also seek benefits for wildlife, water quality, flood amelioration and climate regulation."*

4.3 County / District Landscape Character

Surrey Landscape Character Assessment, (Surrey Heath, Runnymede and Woking)

- 4.3.1 The Site lies within the SS: Settled and Wooded Sandy Farmland Landscape Character Type (LCT); and more specifically predominantly within the SS8: Chobham East Settled and Woody Sandy Farmland Landscape Character Area (LCA) with only a very small part located within the SS4: Wentworth and Sheerwater Settled and Wooded Sandy Farmland LCA, to the east: and within the RF: River Floodplain LCT: and more specifically RF5: Windlebrook and Southern Bourne River Floodplain LCA to the south. Refer to Appendices 5 and 6 for detailed information.
- 4.3.2 The key characteristics of the Settled and Wooded Sandy Farmland LCT are described in the study as follows (with most relevant attributes to the Site and its context underlined):

Settled and Wooded Sandy Farmland LCT

- *"Rolling landscape based on the sand solid geology formations..."*
- *Predominately farmland, with varying degrees of settlement and woodland, with the amount of these elements, along with varying field sizes, openness and the degree of other human influences including golf courses, horse paddocks, and nurseries, broadly defining the extent of each individual character area*
- *Urban influence and activity from settlement and transport, increases to the north*
- *To the south, settlement becomes more scattered, with dwellings often edging commons and rural roads*
- *Heavily wooded in places, with heathland commons, now largely regenerated with secondary woodland, or plantation woodland creating an enclosed landscape with glimpses to pastures, open heathland and water bodies*
- *A predominately intimate landscape, with intermittent views across farmland framed by woodland*



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- *Varied historical sites and designed landscapes including cemeteries and memorials with important local historic, architectural, cultural or military associations”*

4.3.3 The SS8: Chobham East Settled and Wooded Sandy Farmland LCA is described as being is located to the north of Woking, consisting of two parts, either side of the Bourne river floodplain, and being defined by the edges of river floodplain, the settlement edge of Chobham to the west, and areas of heathland and woodland to the north, south and east.

4.3.4 The Key Characteristics of the SS8: Chobham East Settled and Wooded Sandy Farmland LCA, relevant to the Site and its surroundings, are defined as:

- *“Underlain by Bagshot Formation Sand, and Windlesham Formation Sand, Silt and Clay solid geology, falling gently towards the The Bourne floodplain.*
- *Consists of pastoral and arable farmland with occasional areas of woodland. Fields sizes are often larger than other surrounding areas of Settled and Wooded Sandy Farmland.*
- *Fields and paddocks, particularly within the north-western part of the character area have a good hedgerow structure along their boundaries, but some fields, mainly the larger fields to the south and east have lost their hedgerows.*
- *There are scattered farmsteads, nurseries, and very occasionally groups of low density dwellings. There are larger buildings and hangers at Fairoaks Airfield and an extensive research and development complex at the McLaren Technology Centre.*
- *Views are often limited or framed by hedgerows and tree cover, but views become more open to the south.*
- *A good network of public rights of way cross the character area and link the two halves of the character area together via footbridges across The Bourne.*
- *An ‘A’ road and a minor road cross through the northern half of the character area, but elsewhere vehicle access is limited to private drives and tracks.*
- *There are two small areas of registered common land, including Little Heath at the north-western end of the character area, which is also designated as a site of Nature Conservation Interest.*
- *The character area abuts part of the Thames Basin Heaths Special Protection Area to the south.*
- *A pleasant landscape, part of the setting to The Bourne, with rights of way providing opportunities for interaction with the landscape including routes to the adjacent river itself. There are limited roads, but settlement, and large buildings reduce the sense of remoteness such as around the airfield and McLaren centre.”*



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4.3.5 The key characteristics of the SS4: Wentworth to Sheerwater Settled and Wooded Sandy Farmland LCA, relevant to the Site and its surroundings, are defined as:

- *“An undulating landscape, underlain by Bagshot Formation Sand solid geology, and small areas of Windlesham Formation Sand, Silt and Clay.*
- *Locally falls towards a number of watercourses and ponds, across the character area.*
- *There are watercourses and ponds throughout the character area, including The Bourne, which flows through the southern part of the character area.*
- *.... Elsewhere, particularly to the south of Ottershaw, the character area is more rural, with wooded interspersed with arable and pastoral fields, although uses including horse paddocks and nurseries are also present.*
- *Field boundaries are generally well vegetated with hedges and trees.*
- *Although dispersed, settlement in the form of areas of very low density large dwellings, scattered small groups of settlement and farmsteads, is spread across the majority of the character area, mostly hidden by surrounding tree cover.*
- *Occasionally there are views across fields to the nearest woodland, but long distance views are restricted by tree cover in most parts of the character area.*
- *There is a moderate network of public rights of way, but some areas have limited public access due to land uses such as golf.*
- *.... A limited number of ‘A’ roads cross the area and connect with minor roads and tracks to provide access to dwellings.*
- *...*
- *There are a number of Sites of Nature Conservation Importance, including woodland within the golf courses. The character area abuts the Thames Basin Heaths Special Protection Area to the west.*
- *Human influence, including settlement is obvious in places, and tempers the sense of remoteness. This is however, generally a secluded landscape, with woodland providing tranquillity.”*

4.3.6 The evaluation of the SS: Settled and Wooded Sandy Farmland LCT, notes that, with regard to key positive landscape attributes, relevant to SS8 and SS4 LCAs and the Site:

“The key positive features that contribute to the character of the area and that should be conserved and enhanced are:

- *Areas of rural, intimate and peaceful character*
- *Commons with their heathland vegetation of high biodiversity interest, and Open Access Land which function as both a recreational*



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resource for more built up areas to the north, and as a rural setting for villages and roadside settlement

- *Ponds and streams*
- *Varied woodlands including 19th century plantations and small belts and copses giving an enclosed secret character to parts of the area.*
- *Areas of pastoral farmland with intact field patterns.*
- *Remnant historic parkland.*
- *Historic villages centred on greens or commons, particularly to the south of the Settled and Wooded Sandy Farmland.*
- *Pattern of dispersed and small scale linear settlement facing onto commons or roads.*
- *Designed landscapes and buildings with important local historic, architectural or cultural associations, ..."*

4.3.7 The key characteristics of the River Floodplain LCT are described in the study as follows (with most relevant attributes to the Site and its context underlined):

- *"Low lying level areas of flood plain situated on alluvial deposits*
- *Presence of water in the form of rivers, with channels, open water bodies and drainage ditches*
- *Pastoral land use often with meadows grazed by cattle*
- *In character areas to the north, in particular the Thames River Floodplain (Area RF3), there are significant internal and surrounding urban influences including Built up Areas, roads and utilities.*
- *Character areas to the south of the Thames, have few buildings apart from those associated with the river, such as mills and lock keepers cottages, plus some encroachment by large industrial units in urban areas. There is a rich ecology with areas of wetland, unimproved meadows, riparian woodland and ditch line willows ..."*

4.3.8 The RF5: Windlebrook and Southern Bourne River Floodplain LCA is described as being defined by flood zone associated with the Windlebrook, The Bourne, and the Mill Bourne, and as being identifiable as river floodplain, separate and distinct from the surrounding heathland landscape type.

4.3.9 The key characteristics of the RF5: Windlebrook and Southern Bourne River Floodplain LCA, relevant to the Site and its surroundings, are defined as:

- *"Based on Bagshot Formation Sand, and Windlesham Formation Sand, Silt and Clay solid geology, with deposits of Alluvium superficial geology.*
- *Flat, low lying floodplain within the surrounding heathland landscape. The floodplain is dissected by settlement into four separate sections.*



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- *The character area is predominately pastoral, with wet meadows and the occasional arable fields. There are pollarded trees and riparian vegetation and woodland along the main watercourses and tributaries across the character area, and a good network of hedgerow field boundaries elsewhere.*
- *Small blocks of woodland and tree groups are scattered across the character area, No ancient woodland is recorded.*
- *Long distance views across are generally contained by vegetation, and woodland along watercourses.*
- *There are relatively few roads, and no railways in the area.*
- *There are a number of public rights of way within the character area, allowing good access to the many watercourses.*
- *The character area contains a small number of dwellings, farm buildings and a nursery, and there is limited urban influence overall. The area includes the edge of Chobham Conservation Area.*
- *A number of areas, including Broadford Meadows, Chobham Meadows, and Bourne Fields and Young Stroath Meadows, are designated as Sites of Nature Conservation Importance for their species-rich grassland, wet meadows, marsh and wet woodland.*
- *With its riparian vegetation, meadows, limited urban influence and low-key public access, the majority of the character area is relatively unspoilt and tranquil."*

4.3.10 The evaluation of the RF: River Floodplain LCT, notes that, with regard to key positive landscape attributes relevant to the RF5 LCA and the Site:

"The key positive features that contribute to the character of the area and that should be conserved and enhanced are:

- *Peaceful, often secluded, pastoral landscapes, along meandering watercourses ...*
- *Riparian vegetation and land use, such as waterside meadows, wet woodland (eg Alder), varied grassland and occasional marsh of biodiversity interest ...*
- *Areas of intact pattern of ditches with ditchline willows.*
- *Often grazed by cattle, particularly the Upper Wey River Floodplain (Area RF8).*
- *Largely unsettled, undisturbed ambiance with woodland belts screening development on the edges of the area ...*
- *Rural roads with narrow stone bridges. ...*
- *Provides amenity space for urban areas within the northern part of the County ...*



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- *Provides recreation opportunities for rural access through the river valleys."*

4.3.11 With regard guidance for the SS: Settled and Wooded Sandy Farmland LCT and the RF: River Floodplain LCT, the study sets out the following, relevant to the Site and its surroundings:

SS: Settled and Wooded Sandy Farmland LCT

Landscape Strategy:

The landscape strategy for the Settled and Wooded Sandy Farmland is to conserve peaceful enclosed areas with their mosaics of heathland, woodland, and pastoral farmland, and to conserve historic villages and small scale settlement set around greens and commons, including careful consideration of the impact from any further development and enhancement of recreation opportunities. There are opportunities for enhancement include management of the open heathlands and pastures to prevent encroachment by woodland and restocking hedgerows, as well as reducing visual impact of transport corridors locally.

Landscape Guidelines

Land Management

- *Encourage landowners to maintain an appropriate management regime using traditional farming techniques where these will conserve and enhance key landscape features such as the commons, woodlands and pastures*
- *Raise awareness of the historic dimension of the landscape to landowners including the commons, parklands and woodlands*
- *Conserve, manage and encourage the increase of the heathland habitats, continuing to promote local community and volunteer involvement, preventing further encroachment by woodland and taking opportunities to restore and extend these habitats*
- *Encourage sustainable and multi-purpose woodlands and promote traditional woodland management techniques with local landowners and the farming community*
- *Promote the use of locally appropriate species such as oak, birch and Scots pine*
- *Conserve and, where appropriate, encourage repair of the historic parkland to maintain and restore key elements such as parkland trees, avenues and woodland blocks*
- *Enhance the hedgerows by replanting and consistent management and resist development that will result in further loss/fragmentation of hedgerows and hedgerow trees*
- *Encourage sensitive design and management of horse paddocks for instance in retaining hedges and resist development of other facilities such as manège that would affect the rural character of the area*



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- *Seek appropriate siting of facilities for leisure and tourism (such as car parks, play areas or picnic sites on the commons). Through active visitor management plans to predict and support appropriate levels of circulation and movement patterns. Ensure recreation use and facilities respect the low key rural character of the commons*

Built Development

- *Retain the pattern of villages, hamlets, isolated farmsteads and short rows of houses facing onto roads or commons set within the matrix of woodland, heathland and open farmland*
- *Conserve the greens and commons that form the rural settings for villages*
- *Retain the individual settlements avoiding merging these through linear development along roads*
- *Ensure that new development is designed to retain tree cover that is essential to the character of this area and consider opportunities for new woodland planting to enhance existing and new development and integrate it within the landscape*
- *Improve understanding of the general pattern of settlements and their relationship to the landscape and maintain development control to ensure that new development is sympathetic to the wider pattern of settlement*
- *Conserve the rural roads minimising small-scale incremental change such as signage, fencing or improvements to the road network or bridges which would change their character*
- *Resist urbanisation of roads within settlement through encouraging appropriate surfacing of existing pavements, enhancing the immediate landscape setting and ensuring minimum clutter*
- *Ensure that lighting schemes are assessed for visual impact and encourage conservation of existing areas of 'dark skies'*
- *Promote the use of traditional signage features with particular regard to local style and materials*
- *Oppose the erection of new masts where they will be visually dominant and where they would adversely affect views of the wider landscape. Ensure sympathetic siting and design of any new tall features*
- *Refer to Surrey design guidance: Surrey Design (Surrey Local Government Association)"*

RF: River Floodplain LCT

Landscape Strategy

The strategy for River Floodplain is to conserve the rural, secluded areas of landscape with its river channels, pastures, wetlands and woodland, Elements to be enhanced are the management of the pastures, woodlands and ditchline willows associated with the river corridors, ...



Landscape Guidelines

Land Management

- *Encourage landowners to maintain an appropriate management regime using traditional farming techniques, to conserve and enhance key landscape features such as relatively small-scale irregular field pattern, hedgerows and hedgerow trees, ditches and ditchline willows, meadows and wetlands*
- *Conserve and enhance the waterside meadows and pastures with cattle grazing management, and resist the improvement of grasslands and drainage schemes which could disturb the characteristic landcover, vegetation or adversely affect ecological value ...*
- *Ensure physical and biodiversity links to river valley character areas (Type RV) are maintained.*
- *Seek to ensure infrastructure associated with horses is sympathetic to the landscape character, e.g. sensitively designed fencing, and resist intensification of paddocks within the area.*
- *Conserve, enhance and restore riparian woodland, the stock of individual field and riverbank trees, and the blocks and bands of woodland at the edge of the area that screen development.*
- *Promote traditional woodland management techniques with local landowners and the farming community*
- *Encourage sustainable and multi-purpose woodlands and the use of locally appropriate species such as willows, alder and oak trees*
- *Seek to conserve and enhance the distinctive low key, rural character of leisure facilities ... and other public footpath/bridleways or cyclepaths which cross the area, through the encouragement of appropriate surfacing, materials and signage*
- *Seek appropriate siting of facilities and new access links for leisure and tourism through visitor management to support appropriate levels of circulation and movement patterns of different user groups*
- *Encourage conservation of historic landscape pattern of meadows and waterways, and understanding of underlying archaeology.*

Built Development

- *Ensure any new development is sensitively sited and designed with, scale, form and detailing, including materials, which conserve the historic character and settlement pattern of the area. Refer to Surrey design guides; Surrey Design (Surrey Local Government Association) ...*
- *Avoid the location of any new large mass or bulky structures where overly visually intrusive on this character area. Subject any development to rigorous landscape and visual impact assessment, site carefully, and design to minimise impact and integrate with the rural context ..*



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- *Encourage the continuing provision of suitable native boundary tree belts to existing adjacent large scale development to reduce adverse impact on this sensitive character area and reduce glare and mass from long-distance viewpoints ...*
- *Promote appropriate scale and form of boundary treatment to avoid negative visual impact of inappropriate boundaries on the rural character of the flood plain.*
- *Encourage the retention of woodland planting that screens settlement and roads adjacent to the area and consider additional planting to screen existing or new development that intrudes in rural views.*
- *Conserve the rural roads and small bridges minimising small-scale incremental change such as signage, fencing or improvements to the road network or bridges which would change their character ...*
- *Resist urbanisation of roads through encouraging appropriate surfacing of existing pavements, enhancing the immediate landscape setting and ensuring minimum clutter*
- *Ensure that lighting schemes are assessed for visual impact and encourage conservation of the existing 'dark skies' in the largely unsettled floodplain*
- *Promote the use of traditional or rural signage features with particular regard to local style and materials*

- 4.3.12 Relevant extracts of the Surrey LCA for Surrey Heath: RF5 are included in **Appendix D**, and for Runnymede: SS4-SS8 are included in **Appendix E**.

Surrey Heath Landscape Sensitivity Assessment, July 2021

- 4.3.13 The Landscape Sensitivity Assessment sets out, at Paragraph 2.1 and 2.2, that the “approach to assessing landscape sensitivity” is a description of “landscape sensitivity, within the context of spatial planning and land management” which is:

“a measure of the resilience, or robustness, of a landscape to withstand specified change... without undue negative effects on the landscape and visual baseline and their value”.

“It is a term applied to landscape character and the associated visual resource, combining judgements of their susceptibility to the specific development type / development scenario or other change being considered together with the value(s) related to that landscape and visual resource.”

- 4.3.14 The assessment considers the “sensitivity to residential development, assumed to be of between two and three storeys in height” and also comments where there would be particular sensitivity, or lack of additional sensitivity, to taller or larger scale development.
- 4.3.15 The assessment sets out generic guidance for accommodating development in Surrey Heath, at Pages 34 to 35, stating that:

“All development should aim to:



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- *Be sensitively sited and designed with, scale, form, detailing, and materials to be in-keeping with existing settlement form and vernacular, and to avoid being overly visually intrusive.*
- *Be sited carefully to relate to the existing settlement pattern, retaining the individual identity of settlements and avoiding the perception of piecemeal development along roads and/or a sense of merging with other settlements.*
- *Promote the use of traditional materials and signage features, particularly in proximity to more historic parts of settlements such as conservation areas, and in order to limit urbanising effects along roads.*
- *Retain tree cover that is essential to the character of an area, and consider opportunities for new planting using locally appropriate species, to help integrate new development within the landscape.*
- *Ensure new landscape components are in character with the locality, form part of a coherent green infrastructure network and provide ecosystem services. The latter could include increasing pollinating insects, providing water storage, preventing soil erosion, enhancing water quality and enhancing sense of place.*
- *Enhance internationally, nationally and locally important habitats and species through appropriate management (for example by the control of woodland and scrub growth to minimise invasion into open heathland).*
- *Maintain, manage and expand priority habitats (including broadleaf woodland, species rich grassland and wood pasture) and hedgerow networks, aiming to link existing and new habitats to help minimise impacts on, and provide net gains for, biodiversity in the Borough.*
- *Encourage sustainable and multi-purpose woodlands and promote traditional woodland management techniques with local landowners.*
- *Preserve areas of historic field patterns and parkland as well as historic features and landscape elements that enhance their settings.*
- *Encourage landowners to maintain an appropriate management regime using traditional farming techniques to enhance key landscape features such as woodland, small-scale irregular field patterns, hedgerows, hedgerow trees, and meadows.*
- *Enhance areas of pastoral farmland and paddocks by retaining intact field patterns, restocking existing degraded hedges, replacing fencing with hedges using locally characteristic species, and through consistent management.*
- *Manage and enhance recreational resources to provide public enjoyment, while protecting areas of high ecological importance and appropriately siting any associated features (such as car parks and picnic areas) to avoid impacting the distinctive low-key rural character of public footpath/bridleways which cross the area.*



4 Landscape Character

- *Be designed with reference to the Surrey Landscape Character Assessment (2015) guidance.*
- *Use 3D visual representations to understand the landscape and visual impact of development proposals – as set out in Landscape Institute's Visual Representation of Development Proposals."*

4.3.16 The assessment appraises the LCAs set out in the Surrey Landscape Character Assessment (2015). The assessment therefore considers LCA RF5: Windlebrook and Southern Bourne River Floodplain and LCA SS8: Chobham East Settled and Wooded Sandy Farmland, sub-divides the LCAs with reference to areas of differing landscape sensitivity.

4.3.17 LCA RF5: Windlebrook and Southern Bourne River Floodplain is sub-divided into four sub-areas: RF5a: East of Bagshot (Moderate Landscape Sensitivity); RF5b: Between Lightwater/West End and Chobham/Shrubbs Hill (Moderate high Landscape Sensitivity); RF5c: Settlement edge south of Chobham (Moderate high Landscape Sensitivity); and RF5d: East of Mimbridge (Moderate Landscape Sensitivity).

4.3.18 LCA SS8: Chobham East Settled and Wooded Sandy Farmland is sub-divided in to four sub-areas: SS8a: Settlement edges east of Chobham (Moderate Landscape Sensitivity); SS8b: Settlement edge north of Mimbridge (Moderate Landscape Sensitivity); SS8c: Fair Oaks Airport (Low moderate Landscape Sensitivity); and SS8d: Wider landscape (Moderate high Landscape Sensitivity).

4.3.19 Low Moderate Landscape sensitivity rating is defined as:

"Landscape and visual characteristics/ values more resilient and of lower susceptibility to change. Likely to be able to accommodate the relevant type of development, although care is still required in siting and design to minimise landscape and visual effects. Thresholds for significant change are high."

4.3.20 Moderate Landscape sensitivity rating is defined as:

"Landscape and visual characteristics/ values susceptible to change. May have some potential to accommodate the relevant type of development if sited and designed sensitively. Thresholds for significant change are intermediate."

4.3.21 Moderate High Landscape sensitivity is defined as:

"Landscape and visual characteristics/ values susceptible to change. May be able to accommodate the relevant type of development but only in limited situations without adverse change or significant effects. Thresholds for significant change are low."

4.3.22 The assessment identifies absolute constraints, and with regard to the Site, absolute constraints only relate to Flood Zone 3b associated with part of the RF5: Windlebrook and Southern Bourne River Floodplain LCA.

4.3.23 Relevant to the Site, the SS8 Chobham East Settled and Wooded Sandy Farmland: SS8c Fair Oaks Airport is assessed as having Low Moderate Landscape Sensitivity. SS8c is described as:



4 Landscape Character

“The sub-area comprises several large-scale hangars and industrial units associated with Fairoaks Airport off Chertsey Road (A319) to the north-west, and landing strips set within open grassland elsewhere. The area has been cleared on almost all of its hedgerows meaning it has a uniform landscape pattern with little sense of time depth. It contains little semi-natural habitat coverage, limited to hedgerow vegetation defining its outer edge; and public access is limited to one footpath passing through the area between Bonsey’s Lane and the McLaren Technology Centre. The landscape is visually open and the existing large-scale development, traffic along the A319 and the intermittent taking off and landing of aircraft limits the sense of remoteness and tranquillity. However, the open grassland covering most of the sub-area retains some rural character.”

4.3.24 With regard to the potential for mitigation:

“Development proposals should:

- Consider opportunities for new woodland and hedgerow planting that are essential to the character of this area to help integrate new development into the landscape.*
- Be sited to ensure that it is perceived as being part of a single settlement rather than piecemeal development along Chertsey Road.*
- Avoid having further urbanising effect along Chertsey Road through the use of appropriate surfacing, the minimising of street clutter and the use of traditional signage with regard to local style and materials.”*

4.3.25 With regard to the potential for enhancement, these include:

- “Enhance areas of pastoral farmland by introducing hedgerows using locally characteristic species, and through consistent management.*
- Enhance the character of the landscape by promoting the use of locally appropriate species such as oak, birch and Scots pine.*
- Encourage landowners to adopt an appropriate management regime using traditional farming techniques where these will enhance key landscape features such as pastures.*
- Encourage sustainable and multi-purpose woodlands and promote traditional woodland management techniques with local landowners.*
- Enhance and increase recreational access to the landscape, while appropriately siting any associated features (such as car parks, picnic areas etc).”*

4.3.26 SS8 Chobham East Settled and Wooded Sandy Farmland: SS8d Wider Landscape (including a small part of SS4 to the east of Stanners Hill, north of the A319) covering the remainder of the Site within LCA SS8 is assessed as of Moderate High Landscape Sensitivity and described as:

“The wider LCA (including the small part of LCA SS4 to the east of Stanners Hill, north of the A319) comprises pastoral and arable farmland with occasional areas of woodland. Fields and paddocks generally display a mixture of complex and simple forms and retain some historic landscape pattern. Much of the woodland within the wider LCA is identified as Priority



Habitat (Deciduous Woodland). Built development is limited to scattered farmsteads, nurseries, and very occasional groups of low-density dwellings, and there are occasional grade II listed buildings that contribute to landscape character. There is a good network of public rights of way cross the area, linking adjacent settlements to the wider countryside. Apart from Chertsey Road (A319) and Stonehill Road, vehicle access within the wider LCA is limited to private drives and tracks. The landscape is also generally visually enclosed, with views often limited or framed by hedgerows and tree cover. This, results in a relatively secluded landscape with a strong rural character and sense of remoteness and tranquillity”.

4.3.27 With regard to the potential for mitigation:

“Development proposals should:

- Be designed to retain woodland and hedgerows that are essential to the character of this area and consider opportunities for new woodland planting to integrate new development within the landscape.*
- Conserve the greens and commons that form the rural settings for villages.*
- Be designed to fit with the pattern of villages, hamlets, isolated farmsteads and short rows of houses facing onto roads or commons set within the matrix of woodland, heathland and open farmland.*
- Be sited to ensure that it is perceived as being part of a particular settlement rather than piecemeal development along roads. This will also help retain the individual identity of settlements (or distinct areas of a particular settlement) and avoid a sense of merging,*
- Avoid having an urbanising effect along roads through the use of appropriate surfacing, the minimising of street clutter and the use of traditional signage with regard to local style and materials”.*

4.3.28 With regard to the potential for enhancement, these include:

- “Enhance areas of pastoral farmland and paddocks by retaining and restocking existing hedges and by replacing fencing with hedges using locally characteristic species, and through consistent management.*
- Promote the use of locally appropriate species such as oak, birch and Scots pine.*
- Enhance the varied woodlands that give an enclosed character to parts of the area by encouraging sustainable and multi-purpose woodlands and promoting traditional woodland management techniques with local landowners.*
- Encourage landowners to maintain an appropriate management regime using traditional farming techniques where these will enhance key landscape features such as woodland and pastures.*
- Enhance recreational access to the landscape, while appropriately siting any associated features (such as car parks, picnic areas etc).”*



4 Landscape Character

- 4.3.29 RF5 Windlebrook and Southern Bourne River Floodplain: RF5d: East of Mimbridge is assessed as having Moderate Landscape Sensitivity. RF5d is described as:

“Generally comprises a series of agricultural fields and meadows defined by a good hedgerow network, which retains some historic landscape pattern. The area includes land associated with Fairoaks Airport to the east, comprising open grassland surrounding a landing strip. It is generally more visually open than other areas of the floodplain with large-scale hangers and industrial units at Fairoaks Airport, and the intermittent taking off and landing of aircraft, having some influence on the perceived sense of remoteness and tranquillity. The area contains no nature conservation designations, has no heritage features that contribute to landscape character, and has relatively limited public access.

Sensitivity may be higher where land is more distant from Fairoaks Airport and is separated from it by hedgerow or woodland vegetation.

- 4.3.30 With regard to the potential for mitigation:

“Development proposals should:

- Be sensitively sited and designed with, scale, form and detailing, including materials, to avoid being overly visually intrusive in the flat floodplain and to conserve the historic character of the area.*
- Use suitable native boundary tree belts, including locally appropriate species such as willows, alder and oak trees, to help integrate new development within the landscape*
- Retain woodland planting and hedgerow vegetation that screens existing development from the area, as well introduce additional planting to screen new development that would intrude in rural views.”*

- 4.3.31 With regard to the potential for enhancement, these include:

- “Enhance and restore riparian woodland, individual field and riverbank trees, and blocks and bands of woodland that screen development.*
- Promote traditional woodland management techniques and use of locally appropriate species such as willows, alder and oak.*
- Enhance the distinctive low key, rural character of public footpath/bridleways which cross the area through the encouragement of appropriate surfacing, materials and signage, while managing and enhancing important habitats and species.*
- Encourage landowners to maintain an appropriate management regime using traditional farming techniques to enhance key landscape features such as relatively small-scale irregular field patterns, hedgerows, hedgerow trees, and meadows.*
- Enhance the waterside meadows and pastures with cattle grazing management and resist the improvement of grasslands and drainage schemes which could disturb the characteristic landcover, vegetation or adversely affect ecological value.*



- *Ensure infrastructure associated with horses is sympathetic to the landscape character, for example sensitively designed fencing, and resist intensification of paddocks within the area.”*



5 Site Appraisal

5.1 Overview

- 5.1.1 The Site and the surrounding environment was visited in June 2020, with **Site Appraisal Photographs A - X** illustrating the existing character of the Site and immediately surrounding landscape. The locations from which the **Site Appraisal Photographs** were taken are shown on **Figure 3: Site Appraisal Plan**.
- 5.1.2 An appraisal has been undertaken to ascertain the existing character of the Site. This is accomplished through recording and analysing the existing landscape features and characteristics, the way the landscape is experienced, and the value or importance of the landscape and visual resources in the vicinity of the Site. The elements of the landscape that contribute to landscape character include the built and natural form, the pattern of features, detailing, scale, planting, land use and human perception. In this regard, landscape character is derived as a result of the perception of, and action and interaction of, natural and human factors.
- 5.1.3 The majority of the Site, that is the northern parts of the Site, lies within a Settled and Wooded Sandy Farmland LCT, with the southern fringes of the Site lying within the River Flood Plain LCT, as illustrated on **Figure 1: Landscape and Visual Context Plan**.
- 5.1.4 Fair Oaks airport is predominantly located in the north-western part of the Site and is comprised of aviation buildings, and the industrial buildings of the associated industrial/business park. The character of this part of the Site is illustrated by Site Appraisal Photographs A, B, and C, and Site Appraisal Photograph X, which is an enlarged extract of Site Appraisal Photograph F.
- 5.1.5 The runway, taxiways, hardstandings and mown grass reserves and verges of the airfield, that also form part of the functional airport, characterise the central-western part of the Site, as illustrated by Site Appraisal Photographs D, E, F, G, H, U and V.
- 5.1.6 These areas of the Site do not reflect the key landscape or settlement characteristics of the Settled and Wooded Sandy Farmland LCT.
- 5.1.7 The eastern parts of the Site are undeveloped, and comprise a rolling agricultural landscape with parkland trees, which was formerly parkland associated with Ottershaw Park, the remnants of which, along with the Grade II Listed Mansion, are located to the north of, and adjoin, the northern boundary of the Site, as illustrated by Site Appraisal Photographs P and R. This area exhibits a few of the key landscape characteristics of the Settled and Woody Sandy Farmland LCT, with regard to the rolling landform, and the designed landscape of former parkland.
- 5.1.8 The central part of the Site is comprised of pastoral fields, varying in shape, size and degree of enclosure provided by intermittent field boundary vegetation, scattered trees and some woodland, and emerging native scrub.



- 5.1.9 Site Appraisal Photographs I, K, L and M illustrate the relatively open fields within the central-southern parts of the Site; however, containment and enclosure is still provided by the vegetation associated with the River Bourne Valley, the adjoining agricultural former parkland, and intervening woodland and scrub, between the central fields and the former parkland; and the wider substantial network of woodlands, copses and tree belts, such that the open character is confined to the Site.
- 5.1.10 Site Appraisal Photographs N and O illustrate the transition between the fields within the centre of the Site and the agricultural former parkland landscape within the eastern part of the Site, with the subtle change in both landform, and character and form of vegetation.
- 5.1.11 Site Appraisal Photographs Q, S and T illustrate the relatively more enclosed fields within the centre of the Site, where field boundary vegetation, woodland and scrub provide a higher degree of enclosure.
- 5.1.12 Site Appraisal Photograph W illustrates the relatively open character of the central field to the north of the airfield; however, this is again contained by woodland and treebelts along the eastern field boundary and along the A319 Chertsey Road, such that the open character is generally confined to within the Site.
- 5.1.13 The southern fringes of the Site are associated with the River Bourne and, as such, reflect some of the key characteristics of the River Floodplain LCT, such as being low lying, with water in the form of rivers, channels, and drainage ditches, meadows grazed by cattle, and having a rich ecology with areas of wetland, unimproved meadows, riparian woodland and ditch line willows.
- 5.1.14 The character of the southern areas of the Site, associated with the River Bourne, is illustrated by Site Appraisal Photograph J.
- 5.1.15 The Site therefore exhibits the transition from an urban, Industrial/Business Park, to flat open airfield with associated runway, taxiways, hardstanding and mown grass and verges, devoid of any other vegetation (that comprises part of the previously developed nature of the site); to agricultural fields of varying size and enclosure and former parkland, and the River Bourne Valley, to the east and south respectively.
- 5.1.16 The central and eastern areas of the Site, beyond the airport and airfield, exhibit a few of the characteristics of the Settled and Wooded Sandy Farmland LCT, having a rolling landform, and being predominantly farmland with some limited woodland, with a component of designed former parkland; and the southern part of the Site exhibits more of the River Floodplain characteristics. However, much the Site exhibits a considerably lesser extent of key characteristics and associated vegetation, both within the airport and airfield, and the wider areas of the Site, than that of the surrounding landscape.
- 5.1.17 The Site is set within an immediately surrounding landscape more characteristic of the Settled and Wooded Sandy Farmland LCT to the immediate north and east, and south of the River Floodplain LCT, being *“heavily wooded in places, with heathland commons, creating an enclosed landscape with glimpses to pastures, open heathland and water bodies, and an intimate landscape”*, *“with intermittent views across farmland framed by woodland”*; with a



further more wooded landscape beyond associated with the Sandy Woodland LCT, as illustrated on **Figure 1: Landscape and Visual Context Plan**.

- 5.1.18 Therefore, whilst the much of the Site is open in character the appreciation of this open character is limited to within the Site, and is influenced by the urban built development associated with the airport, with the surrounding well-wooded and vegetated landscape providing substantial physical enclosure for, and containment to, the Site, as demonstrated by the Site Appraisal Photographs.



6 Visual Appraisal

6.1 Existing Visual Context

- 6.1.1 A visual appraisal has been undertaken to determine the relationship of the Site with its surroundings and its approximate extent of visibility within the wider landscape from publicly accessible locations.
- 6.1.2 The potential visibility of the Site is largely determined by the intervening landform, as topographic features such as ridgelines and subtle undulations may block or curtail views towards the Site. In addition, land cover has an important role in determining potential visibility; woodland, tree belts or built forms may contribute to additional blocking, filtering or curtailing of views.
- 6.1.3 The combination of the substantial network of woodlands, copses, tree belts, and parkland, and very gently undulating topography provide a high degree of physical and visual enclosure to the landscape. Whilst the Site has a large expanse of open, featureless landscape, it is influenced by the urban built development associated with the airport; and the surrounding topography and vegetation substantially limit views of, and into, the Site. As such, views are generally restricted to limited to partial views from immediately adjoining the Site, or glimpses from distant more limited elevated locations around the Site; with this being characteristic of the SS8: Chobham East Settled and Wooded Sandy Farmland in that *“Views are often limited or framed by hedgerows and tree cover, but views become more open to the south”*, and the RF5: Windlebrook and Southern Bourne River Floodplain in that *“long distance views across are generally contained by vegetation, and woodland along watercourses”*.
- 6.1.4 A series of **Site Context Photographs** have been taken to demonstrate the availability and nature of existing views towards the Site. The locations of **Site Context Photographs 1 – 28** are illustrated in **Figure 4: Site Context Photographs Location Plan**.
- 6.1.5 Site Context Photograph 1 illustrates the view from the A319 Chertsey Road, at the western entrance to the Site, and illustrates the built form partially visible on the northern part of the Site, set behind and filtered by the vegetation on the northern boundary of the Site along the Chertsey Road, and which generally curtails views into the wider Site.
- 6.1.6 Site Context Photographs 2, 3, 4, 5 and 6 illustrate the sequence of views from PRoW 3 that runs south from the A319 Chertsey Road to connect with Horsell Common Open Access Land and the A245 Chobham Road to the south. These views demonstrate the well vegetated and enclosed character of the PRoW, the extent of boundary vegetation which generally curtails views into the Site, and the subsequent limited frequency of partial glimpses into or across the Site; with the exception of where PRoW 3 runs through the Fair Oaks Airport/Industrial/Business Park, as illustrated by Site Context Photograph 2, and the short length of PRoW 3 that passes the end of the airport runway, as illustrated by Site Context Photograph 4.



- 6.1.7 Site Context Photograph 7 is taken from a track running parallel to the southern boundary of Site, within the northern edge of Horsell Common Open Access Land. It demonstrates the densely vegetated and wooded boundary between the Site and Horsell Common, and is one of the very few glimpses through to the Site. It therefore illustrates the very limited visibility of the Site from within the Horsell Common Open Access Land.
- 6.1.8 Site Context Photographs 8, 10, 11, 12 and 13 illustrate the sequence of views from PRoW 1, which runs north from the A245 Chobham Road, through Horsell Common Open Access Land, McLaren Park associated with the McLaren Technology Centre, and through the Site along the eastern edge of the airfield, to the A319 Chertsey Road.
- 6.1.9 Site Context Photograph 8 is taken from PRoW 1 within McLaren Park, and illustrates the combination of the relative low-lying valley landform and the density of intervening vegetation, such that views of the Site and its associated built development is screened. Site Context Photograph 9 is taken from an identified viewing point on a more elevated location within McLaren Park. It again illustrates the intervening relative low-lying valley landform and dense vegetation, such that the Site is generally screened, with views limited to filtered glimpses of the upper parts of built form on the northern boundary of the Site.
- 6.1.10 Site Context Photograph 10 is taken from PRoW 1 at the footbridge over the River Bourne; and illustrates the well-vegetated character of the river valley, which screens and curtails views to, and of, the Site. Site Context Photographs 11 and 12 are taken from PRoW 1 where it passes to the east of the airfield. There are, by virtue of the function of the airfield, open views to the west, to the existing building associated with the airport and industrial/business park in the north-western part of the Site. Site Context Photograph 12 is taken from the point at which the northern length of PRoW 1 then passes into a more wooded context such that views of the Site are restricted.
- 6.1.11 Site Context Photograph 13 is taken from PRoW 1 where it emerges onto the A319 Chertsey Road, and again illustrates the well-vegetated character of both the northern part of PRoW 1 and the A319 road corridor, generally screening views of the Site.
- 6.1.12 Site Context Photographs 14, 15 and 16 illustrate the views from the PRoWs to the north of the A391 Chertsey Road, with Site Context Photographs 14 and 15 from PRoW 2, and Site Context from PRoW 104. Site Context Photograph 14, taken from the A319 Chertsey Road illustrates the existing influence of the industrial buildings which front on the A319. Site Context Photographs 15 and 16 illustrate that, even from rising ground to the north of the Site, the combination of topography and intervening vegetation curtails views of the Site.
- 6.1.13 Site Context Photographs 17 and 18 illustrate the views from PRoW 4, on approach to the Site from the east, and joining with PRoW 3 running along the western boundary of the Site. These views illustrate how the relative flat topography and existing layers vegetation between the Site and PRoW 4 combine to screen views of and into the Site.
- 6.1.14 Site Context Photographs 19, 20, 21 and 22 illustrate the views on approach to the Site from the east, along PRoW 113, again joining with PRoW 3 running along the western boundary of the Site. These views generally illustrate how the relative flat topography and existing layers vegetation between the Site and PRoW 4 combine to screen views of and into the Site,



with the exception of glimpses into and across the Site, where there are breaks in the western boundary vegetation, in particular at the western end of the airport runway, as illustrated by Site Context Photographs 21 and 22.

- 6.1.15 Site Context Photographs 23 and 24 illustrate the views along PRoW 404, to the south-east of the Site, travelling east into and connecting with the Horsell Common Open Access Land. Again, views of, and into, the Site are curtailed by the combination of the intervening topography and layers of vegetation, within the River Bourne Valley.
- 6.1.16 Site Context Photograph 25 illustrates the views from PRoW 7 to the west of the Site, on slightly more elevated land. However, the combination of the intervening topography and layers of vegetation to the west of the Site still screens and curtails views of, or into, the Site. Site Context Photograph 26 illustrate the views from PRoW 51 to the further north-west of the Site, on slightly more elevated land. The immediately surrounding existing vegetation and residential development, and the intervening vegetation, screen views towards the Site.
- 6.1.17 Site Context Photographs 27 and 28 are taken from the A320 Guildford Road, in the vicinity of Wey Farm, and the eastern access into the Site. Site Context Photographs 27 and 28 illustrate the visual well-contained character of the A320 Guildford Road corridor, and the limited views into the Site.
- 6.1.18 In summary, whilst much of the Site is 'open', mainly arising from its function as an airfield, the open character is influenced by the urban built development associated with the airport. Notwithstanding the extent of the Site and the 'open' character of much of the Site; the substantial network of woodlands, copses, tree belts, and parkland, throughout the valley floor and on the surrounding valley sides to the north, east, south and west, provide significant physical and visual enclosure around the Site. As a result, the visibility of the Site is very restricted, with generally no open or expansive views of the Site, except for a short length of PRoW 1 where it passes the eastern edge of the airfield; and with infrequent filtered glimpses of the Site from the immediate surrounding area, primarily limited to where breaks in the western boundary vegetation at the western end of the runway views allow views into, or across, and from the elevated viewpoint in McLaren Park.



7 Green Belt Review

7.1 Contribution to the Green Belt

Assessment against the purposes of the Green Belt

- 7.1.1 An assessment of the contribution of the Site to the first four purposes of the Green Belt, as set out in Paragraph 143 of the NPPF, has been undertaken as set out in the table below. The assessment acknowledges that the Surrey Heath and Runnymede published Green Belt assessments, notably the Green Belt ‘parcels’ do not share the same boundaries as the Site, however findings that relate to the Site have been included for comparison below within Table 7.1. The locations and boundaries of the Green Belt Assessment Areas are shown on **Figure 2: Green Belt Assessment Areas Plan**.
- 7.1.2 As previously noted, a Planning Application for Fair Oaks Garden Village, submitted in 2018, covering the same extent as the Site, was supported by a Green Belt Assessment, carried out, by CBRE. Whilst the conclusions of the CBRE Green Belt Assessment are noted, this independent review, on behalf of Vistry Group, draws its own conclusions and relates these to the Council published Green Belt assessments.

Table 7.1 – Contribution of the Site to the Purposes of the Green Belt

Purpose	Critique	Contribution
Check the unrestricted sprawl of large built-up areas	<p>The closest settlements are Chobham, Ottershaw and Woking, of which only Woking comprises a ‘large built-up area’. The distance between the southern boundary of the Site and closest properties in Woking is circa 0.9 miles.</p> <p>The Site is therefore not adjacent to a large built-up area, and furthermore, the land between the Site and Woking is Green Belt and comprises Horsell Common as part of the Thames Basin Heath SPA and Heather Farm SANG. These designations provide an in-perpetuity area permanently containing the settlement of Woking.</p> <p>This assessment aligns with the Surrey Heath and Runnymede Green Belt assessments which note that the identified parcels are not adjacent or close to a defined large built up area and therefore do not serve Purpose 1, to check the unrestricted sprawl of large built-up areas.</p>	None
	Runnymede Area 27 (2014)	0/5
	Surrey Heath 2017 Area G52	None
	Surrey Heath 2018 Site CH011	Not assessed
	Surrey Heath 2022 Parcel PDL2	None
	CBRE Assessment of the Site	0/No Contribution
Prevent neighbouring	The site contains 49ha of previously developed land which is largely urban/industrial in character, comprising Fair Oaks airport, associated buildings and	Moderate to None



Purpose	Critique	Contribution	
towns from merging	<p>industrial/business park, and associated runway, taxiways and mown grass verges and surrounds. The buildings/business park is designated a Major Developed Site within Green Belt.</p> <p>The Site is therefore in part previously developed land, so not free from existing development, and whilst located in a gap between the neighbouring settlements of Ottershaw and Chobham, there is clear separation of the Site from Ottershaw and Chobham, with the land between them being Green Belt. The Site does not physically, nor appear visually to, adjoin these settlements, and the Site could be developed without the loss of visual separation between towns due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation.</p> <p>The Runnymede Green Belt assessment (2014) notes that Area 27“Forms part of a wider, less essential gap between Ottershaw and Woking to the south. Prevents ribbon development along the A320. The gap is of sufficient scale that development would be unlikely to result in the merging of the settlements.”</p> <p>The Surrey Heath Green Belt assessment (2017) notes that Parcel G52b, which forms the majority of the Site, makes “only a limited contribution to the gap between settlements, being extensively built up and, alongside land at Chobham Business Centre, interrupting the otherwise broad gap between Chobham and Ottershaw and Chobham and Woking” and scores weakly against Purpose 2, to prevent neighbouring towns from merging.</p> <p>The Surrey Heath Appraisal of Sites: Green Belt (2018) does not set out a justification for differences in weighting of the scores beyond the text in para 5.141 which states: “despite the presence of commercial buildings, the central airfield part of the Site (G52b) makes a weak contribution to Purpose 2Open land to the northeast (G52c) and south (G52a) has a more rural character and makes a stronger contribution to Green Belt purposes. G52c makes a strong contribution to Purpose 2 ... and G52a makes a moderate contribution to Purpose 2....”</p>		
	Runnymede Area 27 (2014)	1/5	
	Surrey Heath	2017	2018
	Area G52a	Moderate/strong	Moderate
	Area G52b	Weak	Weak
	Area G52c	Moderate/strong	Strong
	Surrey Heath 2022 Parcel PDL2	Weak	
	CBRE Assessment of the Site	0/No Contribution	
Assist in safeguarding the countryside from encroachment	The Site contains 49ha of previously developed land which is largely urban/industrial in character, comprising Fairoaks airport, associated buildings and industrial/business park, and associated runway, taxiways and mown grass verges and surrounds. The buildings/business park is designated a Major Developed Site within Green Belt. This part of the Site makes no	Moderate - None	



Purpose	Critique	Contribution	
	<p>contribution to assisting in the safeguarding of the countryside from encroachment.</p> <p>The agricultural land and former parkland within the eastern parts of the Site are more rural, and open character in so far as there is no built development. This part of the site therefore performs provides a moderate contribution in relation to this purpose.</p> <p>The Site therefore make a varied contribution to safeguarding the countryside from encroachment, increasing from none in the north-western part increasing to moderate in the southern and eastern parts.</p> <p>The Runnymede Green Belt assessment (2014) gives the following justification for the high score for Area 27 "The land parcel has a largely open character, although Ottershaw Estate lies adjacent to the A319, and there are some dispersed farm buildings in the south east. Less than 10% of the land parcel is covered by development."</p> <p>The Surrey Heath Green Belt assessment (2017) notes that Parcel G52b also scores weakly against purpose 3, to assist in safeguarding the countryside from encroachment, because of the "urbanising" features of Fair Oaks airport which "impact upon the openness of the Green Belt in this location".</p> <p>The Surrey Heath Appraisal of Sites: Green Belt (2018) increases the scoring for Area 52b from Weak to Moderate. However the appraisal does not elaborate upon the rationale for this change. Para 5.141 state: "With regard to Green Belt, despite the presence of commercial buildings, the central airfield part of the Site (G52b) makes a weak contribution to Purpose 2 and a moderate contribution to Purpose 3 of the Green Belt." It also notes: "Open land to the northeast (G52c) and south (G52a) has a more rural character and makes a stronger contribution to Green Belt purposes. G52c makes a strong contribution to Purpose 3 and G52a makes astrong contribution to Purpose 3."</p>		
	Runnymede Area 27 (2014)	5/5	
	Surrey Heath	2017	2018
	Area G52a	Moderate/ Strong	Strong
	Area G52b	Weak	Moderate
	Area G52c	Moderate/ Strong	Strong
	Surrey Heath 2022	Weak	
	CBRE Assessment of the Site	3/Moderate	
Preserve the setting and special character of historic towns	<p>There are no historic towns in the vicinity of the Site</p> <p>Whilst the surrounding settlements of Chobham, Ottershaw and Woking contain historic cores, existing modern development occurs between, and thus intervening between, the historic cores of these settlements and the Site. Therefore, the Site does not form part of the setting of a historic town and does not have a physical, visual, character or experiential connection with the historic part of any town.</p>	None	



Purpose	Critique	Contribution
	The Runnymede Green Belt assessment (2014) concludes that there are no historic settlements within Runnymede that have not been surrounded by modern development.	Not assessed
	The Surrey Heath Green Belt assessment (2017) notes that parcel G52 "is not considered to form part of the setting of, or contribute to the special character of any historic town".	Not assessed
	Surrey Heath 2022 Parcel PDL2	None
	CBRE Assessment of the Site	No contribution

7.1.3 In addition to the above, the Surrey Heath Green Belt Review 2022 Part 1 Assessment, PDL2: Fair Oaks Airport is assessed as having a rating of Low Function, when considering the overall combined contribution to the purposes of the Green Belt.

7.1.4 With regard to the Part 2 Assessment: Wider Impact Study, PDL2: Fair Oaks Airport is assessed as being of **Higher Risk** to wider Green Belt.

Assessment against the characteristics of the Green Belt

7.1.5 The NPPF states that the key characteristics of the Green Belt are "*their openness and their permanence*". The Site has varying degrees of openness, in terms of presence and extent of development, increasing in openness from north-west to the south and east.

7.1.6 There would inevitably be a reduction in 'technical openness' on the Site compared to the existing character of the Site arising from the development of the Site. However, the surrounding substantial network of woodlands, copses, tree belts, and parkland, throughout the valley floor and on the surrounding valley sides to the north, east, south and west, provide significant physical and visual enclosure around the Site, such that the appreciation of the openness of parts of the Site are very restricted, generally limited to within the Site itself.

7.1.7 Paragraph 149 clearly stipulates that Green Belt boundaries should be defined clearly "*using physical features that are readily recognisable and likely to be permanent*". The boundaries of the Site are clearly and robustly defined by recognisable physical features.

Proposed development within the Site would be well contained by the existing robust and defensible boundaries, and the surrounding well vegetated context; with the areas of more rural in character in parts of the Site, that is associated with the Bourn River Valley to the south and the remnant parkland to the east, would be retained free from built form, retaining the openness of these areas.

7.1.8 Therefore, the Site, overall, makes a moderate to no contribution to the purposes of the Green Belt and accordingly is suitable for release, on the basis of function. With regard to the risk to the integrity of the wider Green Belt, the Site provides the opportunity for adopting strategies and approaches, as recommended in the 2022 Green Belt Review, to substantially reduce the risk to the integrity of the wider Green Belt; and would offer the potential to contribute to a suitable pattern of development for Surrey Heath, with numerous benefits arising from the proposed development of the Site. Furthermore, through the provision of



enhanced, robust, and clearly distinctive boundaries, the development of the Site would not affect the open character or permanence of remaining surrounding Green Belt, nor would it prejudice the ability of the remaining surrounding Green Belt to perform the purposes, and functions, of Green Belt, across Surrey Heath or Runnymede.

7.2 Grey Belt

Assessment of the Site, based on its contribution to Purposes (a), (b) and (d), with regard to whether the Site can be considered as “Grey Belt”

7.2.1 ‘Grey Belt’ is defined in the Glossary within the NPPF as:

“Grey Belt: For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

7.2.2 As noted, the Site contains 49ha of previously developed land which is largely urban/industrial in character, comprising Fair Oaks airport, associated buildings and industrial/business park, and associated runway, taxiways and mown grass verges and surrounds. The buildings/business park is designated a Major Developed Site within Green Belt. The remainder of the Site does not contribute ‘strongly’ to Purposes (a), (b) and (d), i.e. the Site contributes to Purpose (a): None, Purpose (b): Moderate to None, and Purpose (d): None; and the Site is not covered by any landscape designations or policies relating to Footnote 7, therefore, the remainder of the Site which is not previously developed land can be considered Grey Belt.

Assessment against the characteristics of the Green Belt to determine whether the development of the Site should not be considered ‘Inappropriate’

7.2.3 To satisfy NPPF Paragraph 155 for the development to not be regarded as inappropriate, it will be necessary to demonstrate that the Site is Grey Belt land and that its development would not fundamentally undermine the purposes (taken together) of the Green Belt across the area of the plan.

7.2.4 Therefore, subject to determining that the Site is Grey Belt, it is then necessary to establish the degree to which, should the Site be developed, the extent to which it would fundamentally undermine the purposes, taken together, that is Purposes (a), (b), (c), (d) and (e) of the Green Belt, of the remaining Green Belt across the area of the plan, that is within Surrey Heath and Runnymede, and at the strategic level of function regarding purposes of the Green Belt.

7.2.5 With respect to the fifth purpose of the Green Belt “to assist in urban regeneration by encouraging the recycling of derelict and other urban land”, should the Site be brought forward for development it would not prejudice derelict or other urban land being brought forward for urban regeneration. However, the principle of retaining land within the Green Belt holds true for all areas within the Green Belt, therefore the Site is considered to make the same contribution to this purpose of the Green Belt as any other land parcel within the Green Belt. Accordingly, no additional specific assessment is undertaken.



- 7.2.6 Proposed development within the Site would be well contained by the existing robust and defensible boundaries, and the surrounding well vegetated context; with the areas of more rural in character in parts of the Site, that is associated with the Bourn River Valley to the south and the remnant parkland to the east, would be retained free from built form, retaining the openness of these areas.
- 7.2.7 A landscape-led approach to proposed development within the Site would seek to ensure that any development provides a landscape framework of green infrastructure, which combined with containment provided the existing robust and defensible boundaries of the Site, will create a well vegetated context within which to accommodate the proposed development.
- 7.2.8 While there would be a very slight reduction in the extent of countryside as a result of development within the Site, as proposed development would be predominantly focussed on the previously developed parts of the Site, with the majority of the more rural areas of the Site remaining free of built development, and contributing to Natural Greenspace. Again, the increase in development in the countryside would be localised; and would be contained by the retained rural areas of the Site and existing vegetation on the boundaries of the Site.
- 7.2.9 As noted, the parts of the Site that are not previously developed land do not contribute 'strongly' to Purposes (a), (b) and (d); and do not contribute strongly to Purpose (c), making at most a moderate contribution. Whilst there would be a very limited loss of 'countryside', limited to the open areas of retained as areas free from built form, beyond the areas of previously developed land, the appreciation of this loss, and the introduction of the development, on the Site, would be very limited.
- 7.2.10 The risk to the integrity of the wider Green Belt, as identified in the 2022 Green Belt Review, from the proposed development of the Site would be more limited than assessed, in that the Site is 'well contained by the landscape', and a 'strong boundary would be created to provide a robust distinction between the proposed development on the Site and the wider Green Belt', and proposed development would be well planned and 'well contained such that it would not contribute to, or appear as, sprawl'.
- 7.2.11 In addition, whilst there is an acknowledgement that all Previously Developed parcels identified in the 2022 Green Belt Review are located some distance from neighbouring settlements and, by virtue of the assessment criteria, pose a higher risk to the integrity of the Green Belt in event of release from Green Belt, the proposed development of the Site provides the opportunity, through the landscape-led design and distribution of proposed built form and open space, to reduce the risk to the integrity of the wider Green Belt, and to provide benefits to the remaining and wider Green Belt. This includes 'addressing the nature of the boundary' with 'boundaries strengthened' and 'new landscaping integrated to reduce opportunities for sprawl and to enable a clear distinction between rural and urban areas'. The creation of a broad swathe of Natural Greenspace on the southern and eastern edges of the Site would contribute to securing areas of accessible open land, and offer security of the retention, enhancement and management of landscape features, to ensure their contribution to screening proposed development; and, in addition, with the sensitive approach to building scale and density, create an appropriate transition between built form and the wider Green



Belt and countryside, or urban to rural character, in order to reduce the perception of urbanisation.

- 7.2.12 Furthermore, the proposed development of the Site would provide enhancement of the area retained free from built form, including providing benefits such as improving public access and connectivity, providing locations for outdoor sport, enhancing biodiversity, and retaining and enhancing landscape and visual amenity.
- 7.2.13 Therefore, with regard to the risk to the integrity of the wider Green Belt, the Site provides the opportunity for adopting strategies and approaches, as recommended in the 2022 Green Belt Review, to substantially reduce the risk to the integrity of the wider Green Belt, including the enhancement of the area retained free from built form, providing benefits such as improving public access and connectivity, providing locations for outdoor sport, enhancing biodiversity, and retaining and enhancing landscape and visual amenity; and would offer the potential to contribute to a suitable pattern of development for Surrey Heath, with numerous benefits arising from the proposed development of the Site. Furthermore, through the provision of enhanced, robust, and clearly distinctive boundaries, the development of the Site would not affect the open character or permanence of remaining surrounding Green Belt, nor would it prejudice the ability of the remaining surrounding Green Belt to perform the purposes, and functions, of Green Belt, within Surrey Heath or Runnymede.
- 7.2.14 As the Site is considered as previously developed land and Grey Belt, 'openness' is not required to be considered. However, for completeness, the effect on openness has been assessed. There would inevitably be a reduction in 'technical openness' on the Site compared to the existing character of the Site. The Site has varying degrees of openness, in terms of presence and extent of development, increasing in openness from north-west to the south and east. As noted, proposed development would be predominantly focussed on the previously developed parts of the Site, with the majority of the more rural areas of the Site remaining free of built development and therefore open. In addition, the surrounding substantial network of woodlands, copses, tree belts, and parkland, throughout the valley floor and on the surrounding valley sides to the north, east, south and west, provide significant physical and visual enclosure around the Site, such that the appreciation of the openness of parts of the Site are very restricted, generally limited to within the Site itself.
- 7.2.15 Importantly, there would be no effect on the openness of the wider Green Belt.
- 7.2.16 With regard to meeting the 'Golden Rules' as required by Paragraph 155 of the NPPF, the proposed development of the Site would accord with Paragraph 156 (c) of the NPPF with regard to *"major development involving the provision of housing is proposed on sites released from the Green Belt"* in that it would deliver *"provision of new, or improvements to existing, green spaces that are accessible to the public... new residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces"*; and with Paragraph 159 of the NPPF which states that *"the improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan"*.



- 7.2.17 In conclusion, the Site is in part previously developed land, and the remainder of the Site is considered Grey Belt; and development of the Site would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan, that is within Surrey Heath and Runnymede, and at the strategic level of function regarding purposes of the Green Belt.



8 Development Potential and Landscape Strategy

8.1 Redevelopment Opportunity

- 8.1.1 The Site provides the opportunity for the redevelopment of Fairoaks, creating a vision and set of design principles for the proposed development.
- 8.1.2 Proposed development would be landscape-led from the outset, specifically responding to the findings of the independent Green Belt Assessment; and respecting the findings and recommendations of Green Belt assessments for Surrey Heath and Runnymede. The proposed development would take into account the key positive features of the SS8 Settled and Wooded Sandy Farmland LCA, SS4 Wentworth to Sheerwater Settled and Wooded Sandy Farmland LCA and the RF5: Windlebrook and Southern Bourne River Floodplain LCA, and the drawing on landscape strategies and guidance for these LCAs; and would reflect the finding of the 2021 Landscape Sensitivity Study, with regard to the relative landscape sensitivities of the SS8 Chobham East Settled and Wooded Sandy Farmland: SS8c Fairoaks Airport and SSd Wider Landscape, and the RF5 Windlebrook and Southern Bourne River Floodplain: RF5d: East of Mimbridge.
- 8.1.3 Proposed development would be predominantly concentrated on the previously developed area of the airport, its airfield and taxiways, taking advantage of physically and visual enclosed character of the Site, and being set within an enhanced green infrastructure framework that responds to the varying character across the Site; reflecting the relative contribution that parts of the Site makes to the purposes of the Green Belt; and providing an appropriate transition from the development of the new settlement to wider countryside.
- 8.1.4 Proposed development would therefore be concentrated on areas of least openness and areas already influenced by built development within the Site. Retaining land predominantly free from built development on the southern and eastern edges of the Site, enhanced to provide a broad swathe of Natural Greenspace, would successfully contain the extent of development; and would contribute to retaining the existing pattern of settlement, providing sufficient gaps between Chobham, Ottershaw and Woking, with regard to Purposes 1 and 2 of Green Belt. This would also concentrate development on areas exhibiting lesser attributes of countryside, and avoid development in and south of Ottershaw Park, which is acknowledged as possessing a rural character; and enhancements associated with proposed Natural Greenspace would reinforce and benefit the remaining areas of countryside within southern and eastern parts the Site; thus limiting the encroachment into countryside, with regard to Purpose 3 of the Green Belt.
- 8.1.5 This responds positively to the findings of the Green Belt assessments for Runnymede and Surrey Heath, and the Surrey Landscape Character Assessment.
- 8.1.6 Firstly, the Runnymede Green Belt assessment acknowledges that the gap between Chobham and Ottershaw is of sufficient scale that development could be accommodated without resulting in the merging of settlements; and the proposed distribution of development



would accord with this, with a broad swathe of retained open space to the east and south of proposed built form, preventing the merging of settlements.

- 8.1.7 The proposed development is also concentrated on the Surrey Heath Green Belt land parcel G52b; which scored weakly against the purposes of the Green Belt, both in terms of making limited contribution to the gap between settlements, and with the existing Fairoaks airport having an urbanising influence and an impact on openness of the Green Belt. Land parcel G52b also has a reduced sense of remoteness, as acknowledged in the assessment of LCA SS8 Chobham East Settled and Wooded Sandy Farmland, and in the Surrey Heath Site Appraisal of Sites, for Fairoaks Airport, Site CH011.
- 8.1.8 Retaining land parcels G52a and G52c as open space acknowledges the more rural character of these areas, as identified in, and responding to, the Surrey Heath Appraisal of Sites, for Fairoaks airport, Site CH011; and also contributes to maintaining the gap between, and preventing the merging of, settlements.
- 8.1.9 Provision of open space on the eastern part of the Site also accords with the recommendations of Runnymede General ID Area 27, in the locality of Ottershaw Park, which scores strongly with regard to Purpose 3 of the Green Belt, due to its openness and low density of development (Annex 4 Report). It also reflects LCA SS4 Wentworth to Sheerwater Settled and Wooded Sandy Farmland which exhibits a “more rural” and “generally secluded” character south of Ottershaw. Further SANG and open space on the southern River Bourne corridor aligns with G52a which scores moderately to strongly against Purposes 2 and 3 and is physically constrained by flooding.
- 8.1.10 Furthermore, by avoiding development in Ottershaw Park and south of Ottershaw Park, fragmentation of an area of Green Belt which currently possesses a rural character would be avoided, with the and a low level of built form maintained, such that it would not compromise the ability of the Green Belt to meet Purpose 3, as recommended in the Runnymede Green Belt Assessment.
- 8.1.11 This also broadly accords with the approach to development set out in the proposals that accompanied the Planning Application for Fairoaks Garden Village, submitted in 2018, which concluded that *“harm to the poorer quality Green Belt, and the limited ‘other harm’, is outweighed by the positive benefits of the development”*; and that with concentrating development on the previously developed part of the Site, this would *“redefine the Green Belt in this location, making efficient use of 49 hectares of previously developed land and enhancing and protecting the remaining Green Belt in perpetuity for the enjoyment of the local and wider community and for the benefit of local wildlife”*, with the *“substantial benefits and enhancements arising from the proposals”*.
- 8.1.12 This also reflects the relative landscape sensitivities of the SS8 Chobham East Settled and Wooded Sandy Farmland: SS8c Fairoaks Airport and SSd Wider Landscape LCAs, and the RF5 Windlebrook and Southern Bourne River Floodplain: RF5d: East of Mimbridge LCA, as set out in the 2022 Landscape Sensitivity Study.
- 8.1.13 Proposed development would be predominantly located within the SS8c: Fairoaks Airport LCA, which is assessed as having a Low-Moderate landscape sensitivity to two and three



storey residential development, that is having 'landscape and visual characteristics/values more resilient and of lower susceptibility to change, and likely to be able to accommodate the relevant type of development, although care is still required in siting and design to minimise landscape and visual effects, and where the thresholds for significant change are high'.

- 8.1.14 Land on the southern and eastern edges of the Site would be predominantly retained free from built form, with these areas generally within the SSd Wider Landscape, and the RF5d: East of Mimbridge LCAs, which have a Moderate-High landscape sensitivity and a Moderate landscape sensitivity respectively.
- 8.1.15 Moderate-High landscape sensitivity is having 'landscape and visual characteristics/values susceptible to change, which may be able to accommodate the relevant type of development but only in limited situations without adverse change or significant effects, and where the thresholds for significant change are low'. Moderate landscape sensitivity is having 'landscape and visual characteristics/values susceptible to change, which may have some potential to accommodate the relevant type of development if sited and designed sensitively, and where the thresholds for significant change are intermediate'.
- 8.1.16 Therefore, proposed development has been predominantly located within the part of the Site most able to accommodate development.

8.2 Landscape Strategy

- 8.2.1 The Landscape Strategy for the proposed development, with reference to, and building on, the evaluations for the SS: Settled and Wooded Sandy Farmland LCT and the RF: River Floodplain LCT, Local Plan Policy and the Green Belt Assessments, would include:
- Retention of the key natural features of the Site, including the Bourne River Valley and its associated pastures, wetlands and woodland, in the south of the Site; the remnant parkland formerly associated with Ottershaw Park, in the east of the Site; and key vegetation, such as woodland, and treebelts along PRow, in the eastern-central part of the Site, conserving and enhancing the key positive features that contribute to the character of the area, as identified for the SS: Settled and Wooded Sandy Farmland LCT and the RF: River Floodplain LCT; this would also retain areas of more strongly performing Green Belt predominantly free from built development.
 - Creation of a broad swathe of Natural Greenspace on the southern and eastern edges of the Site, enhancing the existing retained natural features and landscape framework for proposed development; this would retain and enhance areas of the Site with more attributes of countryside, thus limiting encroachment into countryside, in line with the purposes of Green Belt.
 - Retention of the existing PRow across the Site, and provision of enhanced public access through the Natural Greenspace connecting through the proposed development, increasing attractive connectivity to the wider PRow network, areas of Open Access Land and countryside beyond the Site, for not only the new community, but for those existing communities surrounding the Site; also providing improved accessibility to the Green Belt.
 - Enhancement of recreation opportunities for a variety of different user groups; ensuring that recreational use and facilities respect the low key rural character of the surrounding commons, with appropriate siting of facilities and access, and the use of appropriate surfacing, materials and signage; also providing environmental improvements and increased accessibility to the Green Belt.



8 Development Potential and Landscape Strategy

- Promotion of walking and cycling within the proposed development, with a network of new cycle routes and footpaths linked to key destinations to encourage healthy living, help promote health and wellbeing, and improve accessibility to the Green Belt.
- Creation of a series of linked green spaces throughout the proposed development including equipped play areas for children and accessible natural green space; located to ensure that outdoor spaces become hubs for community integration and engagement.
- Provision of Suitable Alternative Natural Greenspace (SANG), as required by Natural England with regard to the proximity of the Site to the Thames Basin Special Protection Area (SPA), which would meet and exceed the requirement for the proposed development on the Site, and provide environmental enhancement to the Green Belt in the southern and eastern parts of the Site.
- Careful consideration of the landscape and visual impact from proposed development, including provision of a robust landscape framework within which to successfully accommodate the proposed development, and assimilate to into the immediate and wider landscape and settlement context; and including the consideration of the visual impact of lighting proposal and reduction of glare, and the sympathetic siting and design of any new tall features.
- Retention of tree cover that is essential to the character of the area and provision of new woodland planting to enhance proposed development, to screen and filter the edges of proposed development, and to integrate it within the landscape.
- Creation of a new settlement that has a distinct character and identity, with reference to Surrey design guidance: Surrey Design (Surrey Local Government Association).
- Creation of a new settlement that is physically and visually separate from the surrounding settlements, and sympathetic to the wider pattern of settlement; without resulting in sprawl, being well contained by the surrounding retained and enhanced Green Infrastructure, and without resulting in the merging of settlements, in line with the Purposes of Green Belt.
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8.2.2 Enhancement of the beneficial use of the remaining Green Belt, including opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land; and the provision of new, or improvements to existing, green spaces that are accessible to the public, with access good quality green spaces within a short walk of proposed homes, whether through onsite provision or through access to offsite spaces, in accordance with Paragraph 151 of the NPPF. These components of the Landscape Strategy for the proposed development would also align with the recommendations for potential mitigation and potential enhancement of the SS8 Chobham East Settled and Wooded Sandy Farmland: SS8c Fairoaks Airport and SSd Wider Landscape, and the RF5 Windlebrook and Southern Bourne River Floodplain: RF5d: East of Mimbridge, as set out in the 2022 Landscape Sensitivity Study.

8.2.3 For the SS8c Fairoaks Airport LCA, with regard to potential for mitigation and enhancement, the proposed development in the western part of the Site allows for:

- Opportunities for new woodland and hedgerow planting that are essential to the character of this area to help integrate new development into the landscape.
- Siting to ensure that proposed development is perceived as being part of a single settlement rather than piecemeal development along Chertsey Road.
- Avoiding having further urbanising effect along Chertsey Road through the use of appropriate surfacing, the minimising of street clutter and the use of traditional signage with regard to local style and materials.



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- Enhancement areas of pastoral farmland by introducing hedgerows using locally characteristic species, and through consistent management.
- Enhancement the character of the landscape by promoting the use of locally appropriate species such as oak, birch and Scots pine.
- Adopt an appropriate management regime using traditional farming techniques where these will enhance key landscape features such as pastures.
- Encouraging sustainable and multi-purpose woodlands and promote traditional woodland management techniques with local landowners.
- Enhancing and increasing recreational access to the landscape, while appropriately siting any associated features (such as car parks, picnic areas etc).

8.2.4 For the SSd Wider Landscape, with regard to potential for mitigation and enhancement, the proposed development in the eastern part of the Site allows for:

- Retaining woodland and hedgerows that are essential to the character of this area and considering opportunities for new woodland planting to integrate new development within the landscape.
- Sited development to ensure that it is perceived as being part of a particular settlement rather than piecemeal development along roads, to retain the individual identity of settlements (or distinct areas of a particular settlement) and avoid a sense of merging.
- Avoiding urbanising effect along roads through the use of appropriate surfacing, the minimising of street clutter and the use of traditional signage with regard to local style and materials.
- Enhancing areas of pastoral farmland and paddocks by retaining and restocking existing hedges and by replacing fencing with hedges using locally characteristic species, and through consistent management.
- Promoting the use of locally appropriate species such as oak, birch and Scots pine.
- Enhancing the varied woodlands that give an enclosed character to parts of the area by encouraging sustainable and multi-purpose woodlands and promoting traditional woodland management techniques.
- Adopting an appropriate management regime using traditional farming techniques where these will enhance key landscape features such as woodland and pastures.
- Enhancing recreational access to the landscape, while appropriately siting any associated features (such as car parks, picnic areas etc).

8.2.5 For the RF5d: East of Mimbridge LCA, with regard to potential for mitigation and enhancement, the proposed development in the southern part of the Site allows for:

- Sensitive sited and designed proposed development with, scale, form and detailing, including materials, to avoid being overly visually intrusive in the flat floodplain and to conserve the historic character of the area.
- Using suitable native boundary tree belts, including locally appropriate species such as willows, alder and oak trees, to help integrate new development within the landscape
- Retaining woodland planting and hedgerow vegetation that screens existing development from the area, as well introducing additional planting to screen new development that would intrude in rural views.
- Enhancing and restoring riparian woodland, individual field and riverbank trees, and blocks and bands of woodland that screen development.
- Promoting traditional woodland management techniques and use of locally appropriate species such as willows, alder and oak.
- Enhancing the distinctive low key, rural character of public footpath/bridleways which cross the area through the encouragement of appropriate surfacing, materials and signage, while managing and enhancing important habitats and species.



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- Adopting an appropriate management regime using traditional farming techniques to enhance key landscape features such as relatively small-scale irregular field patterns, hedgerows, hedgerow trees, and meadows.
- Enhancing the waterside meadows and pastures with cattle grazing management and resist the improvement of grasslands and drainage schemes which could disturb the characteristic landcover, vegetation or adversely affect ecological value.

8.2.6 Landscape Management opportunities, based on the landscape strategies and guidance for land management and built development, as set out in the SS: Settled and Wooded Sandy Farmland LCT and the RF: River Floodplain LCT, would include:

- Conserve and enhance the waterside meadows and pastures with cattle grazing management, and resist the improvement of grasslands and drainage schemes which could disturb the characteristic landcover, vegetation or adversely affect ecological value.
- Conserve and, where appropriate, encourage repair of the historic parkland to maintain and restore key elements such as parkland trees, avenues and woodland blocks.
- Enhance the hedgerows by replanting and consistent management and resist development that will result in further loss/fragmentation of hedgerows and hedgerow trees.
- Encourage sustainable and multi-purpose woodlands and promote traditional woodland management techniques.

8.2.7 The Site, therefore, provides the opportunity for the redevelopment of Fair Oaks, set within an enhanced green infrastructure framework that retains and enhances the key existing landscape features, and responds to the varying character and landscape sensitivity across the Site, and surrounding the Site; providing an appropriate transition from the development of a new settlement to wider countryside, taking advantage of its physical and visual enclosed character. It also provides the opportunity to provide enhanced attractive connectivity to the wider PRoW network, areas of Open Access Land and countryside beyond the Site, for not only the new community, but for those existing communities surrounding the Site.

8.2.8 The proposed development on the Site would create a new settlement that has a distinct character and identity taking reference from the local vernacular; and that would be physically and visually separate from the surrounding settlements, and sympathetic to the wider pattern of settlement.

8.2.9 The proposed development on the Site would therefore accord with Draft Policy E7: Landscape Character, in that it would:

- Respond to and where possible enhance the special character, key positive landscape attributes, value and landscape setting of settlements
- Be integrated with, and positively contribute to the landscape character of the area
- Be sited and designed so as to avoid any adverse impact on key positive landscape attributes identified in relevant Landscape Character Assessments and Landscape Sensitivity Studies;
- Be sited and designed to minimise landscape and visual impacts, in line with the analysis, guidance and strategies provided in relevant Landscape Character Assessments and Landscape Sensitivity Studies;
- Be sited and designed to avoid adverse impact on historic landscapes and registered parks and gardens
- Respect the role the landscape plays in the setting of settlements as set out in the landscape sensitivity study.



- 8.2.10 In addition, the comprehensive Landscape Strategy demonstrates how the proposed development on the Site would successfully integrate with the landscape and surroundings.
- 8.2.11 While there would be a very slight reduction in the extent of countryside as a result of development within the Site, proposed development would be predominantly focussed on the previously developed parts of the Site, on part of the Site with lowest landscape sensitivity, with the majority of the more rural areas of the Site remaining free of built development, and contributing to Natural Greenspace; therefore, the increase in development in the countryside would be localised within an area already largely influenced by development and on the most poorly performing Green Belt, as identified the SHBC and RBC Green Belt assessments. This accords with the Green Belt objectives, as set out Paragraph 182 in the NPPF, in that it channels development towards urban areas inside the Green Belt and utilises previously developed land, and then considers grey belt land.
- 8.2.12 Furthermore, the proposed development would be contained by the retained, and enhanced, rural areas of the Site and existing vegetation on the boundaries of the Site; thus using physical features that are readily recognisable and likely to be permanent, robust and defensible, in accordance with Green Belt objectives set out the NPPF, as set out Paragraph 149 (f).
- 8.2.13 The proposed extensive Natural Greenspace in the eastern and southern parts of the Site, including the enhanced public accessibility would relate to the areas of moderate-high and moderate landscape sensitivity respectively, and equate to the provision of new, or improvements to existing, green spaces that are accessible to the public... new residents would be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces, in line with Green Belt objectives set out in Paragraph 156 (c) of the NPPF, and that *“the improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan”*, as set out in Paragraph 159 of the NPPF.
- 8.2.14 The Site, therefore, provides the opportunity to redevelop previously developed land, some of which is designated as a Major Developed Site within the Green Belt and grey belt land; creating a new settlement of approximately 1,600 homes, in line with the recommendations of Surrey Heath Appraisal of Sites: Green Belt Sites; providing a substantial swathe of Natural Green Space connected to the wider network of Green Infrastructure and countryside, accessible to, and of benefit to, both new and existing communities; with limited harm to the Green Belt, and without affecting the open character and permanence of the remaining Green Belt, nor prejudicing the ability of the remaining Green Belt to perform the purposes, or functions, of Green Belt.



Figures

Figure 1: Landscape and Visual Context Plan

Figure 2: Green Belt Assessment Areas Plan

Figure 3: Site Appraisal Plan

Figure 4: Site Context Photographs Location Plan



Site Appraisal Photographs A – X



Site Context Photographs 1 - 28



Appendix A Extracts from Surrey Heath Borough Council Green Belt and Countryside Study 2017



Appendix B Extracts from Surrey Heath Local Plan Appraisal of Sites – Green Belt Sites 2018



Appendix C Extracts from Runnymede Borough Council Green Belt Review, 2014



Appendix D Extracts from Surrey Landscape Character Assessment, 2015: Surrey Heath



Appendix E Extracts from Surrey Landscape Character Assessment, 2015: Runnymede





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