



CHOBHAM PARISH COUNCIL

The Clerk, Chobham Parish Pavilion, Recreation Ground, Station Road
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21st November 2018

Development Control
Surrey Heath Borough Council
Knoll Road
Camberley
Surrey GU15 3HD

By email: development.control@surreyheath.gov.uk

Dear Sir/Madam

LETTER OF OBJECTION

18/0642 and 18/0919: FAIROAKS AIRPORT, CHERTSEY ROAD, CHOBHAM, WOKING, GU24 8HU

Chobham Parish Council considered the above planning application (and adjoining Borough consultation) at its Extraordinary Planning Committee meeting on 6th November 2018 and regular Planning Committee meeting on 13th November 2018 and resolved to **OBJECT** to the proposals.

The statutory consultation period allows insufficient time to consider the large volume of supporting material associated with this application. Chobham Parish Council has set out this initial response in order to meet the consultation deadline of 21st November 2018, but has been advised by the case officer that later responses will still be considered. It therefore intends to follow up with further representation in due course.

A) OBJECTION in respect of part (a) of the hybrid application (means of site accesses):

The proposal would adversely affect the safe and efficient flow of traffic movement on the highway for reasons including the following:

1. The A319 and A320, both of which are main ambulance routes, have a poor accident record, which includes fatalities. Further accesses and the purpose for which they are proposed would have a detrimental effect on the highway network by intensifying the existing inadequacies of these roads.

2. The village of Chobham is a notorious pinch point and suffers from congestion and delays for road users on a daily basis. The situation becomes even more severe on frequent occasions when there is a highway incident (e.g. accidents, road closures, problems on the M25 or M3 motorways). A main priority of any new junction work should be to help alleviate the current situation. This proposal for creating further accesses for the purpose of introducing a significant volume of additional highway traffic does nothing to address the well documented existing problems.
3. There is an obvious risk of the proposed accesses, in conjunction with the cumulative impact of other proposed or projected developments in the area, creating “rat runs” and adversely affecting traffic flow and safety throughout Chobham and neighbouring areas. Philpot Lane is judged to be particularly vulnerable and must be protected from further pressure.
4. The proposed Chertsey Road (A319) / Youngstroat Lane junction as existing is close to a sharp bend and it is already unsafe for horses, horse riders, cyclists and pedestrians crossing and navigating a 100 metre stretch of the busy A319 to link from Bridleway 3 to Bridleway 2 to the north. The proposed remodelled access to a substantially expanded employment site would exacerbate this already dangerous situation to an unacceptable level. The needs of non-motorised highway users must be given priority at this location.
5. The proposed two pedestrian accesses from Youngstroat Lane link up to public rights of way towards Chobham which are extremely poorly maintained with multiple reported hazards and are not safe or suitable for an increase in footfall. No planning permission should be given for accesses at these locations unless the onward route can be kept clear and safe for members of the public to use.
6. It is unclear why the roundabout access onto the A319 is to be considered the “main” access for the site, when the junction onto the A320 is closer to the nearest town (Woking) and likely to be equally or more heavily used. While both A-roads encounter long tailbacks and sometimes gridlock at peak times, traffic entering the Ottershaw roundabout from the A320 has a degree of priority over the A319, which may make the A320 junction the more desirable route for exiting the site.
7. The visibility sightlines on the northernmost access (from the proposed primary vehicular route) and the access onto the A320 appear to be less than optimal for typical traffic conditions.

B) OBJECTION in respect of part (b) of the hybrid application (outline application) and the other elements of the application:

The proposal is contrary to multiple policies in the National Planning Policy Framework and SHBC Core Strategy and Development Management Policies 2011-2027 and would have unacceptable negative impacts on the Parish of Chobham and the surrounding area.

1. **Green Belt**

The proposal fundamentally conflicts with the purposes of Green Belt.

- a. None of the claimed circumstances constitute “very special circumstances” that would outweigh the potential harm to the Green Belt. Circumstances relating to the provision of housing are not “very special circumstances” and the other proposed benefits can be achieved without the site being used for housing.
- b. It creates a sprawl of large built-up area with disproportionate expansion over the existing built form of the site.
- c. It contributes to the merging of Chobham, Ottershaw and Woking.
- d. It encroaches on the countryside and openness by proposing to build on a large part of the site which is currently green and open and cannot be considered “previously developed land.”
- e. It undermines the setting and special character of the Parish of Chobham.

2. **Sustainability**

The proposal is contrary to the principles of sustainable development and sustainable transport, which seek to direct development to the most sustainable locations and to protect and enhance our natural, built and historic environment. The site is being promoted as a standalone and sustainable community, but certain key community services appear to be either not provided or are insufficient for the proposed new community to meet its own day to day needs (e.g. secondary education, standard GP surgery, burial ground).

3. **Aviation**

National policy is clear in its objective that the importance of general aviation should be recognised, and both current and historic local policy supports the use and growth of Fair Oaks as an airport. Fair Oaks is strategically well-located and plays a vital role in the training of pilots, air traffic controllers and engineers. Significant weight should be given to the Government’s General Aviation Strategy and the potential impacts at regional and national level of another airport closure. The Parish Council recommends that the Minister for Aviation is consulted before a decision on this application is taken.

4. **Highways and traffic**

The proposal would have an unacceptable impact on highway safety and traffic flow.

- a. The introduction of a high volume of additional traffic in a location that already suffers from extreme congestion would constitute a “severe” cumulative impact, even when taken as a standalone scheme.
- b. The combined highway impact of this application with other planned or projected large-scale developments in the area would represent a wholly unacceptable increase in traffic volume and road safety.
- c. The poor accident record of the A319 and A320 is testimony to the existing inadequacy of these roads.

- d. There is an obvious risk of “rat runs” being created throughout the local area, with Philpot Lane particularly vulnerable.
- e. It appears no mitigation or improvements are proposed for the weight-restricted Philpot Lane, its junctions with the A319 and A3046 or its blind single-lane humpback bridge. Multiple factors make this lane unsuitable and unsafe for the inevitable increase in traffic load which would be created by this development.
- f. There are safety issues associated with the proposed bridleway and footpath linkages, where existing problems would be exacerbated.

5. Chobham Village

The proposed development would have significant negative impacts on Chobham and the quality of life of its residents, including:

- a. Highway and traffic impacts as set out above.
- b. Potential mitigation schemes within Chobham at the A319 junctions are unlikely to alleviate the present situation or mitigate the additional traffic. In addition, they represent unsuitable urbanisation of the Conservation area and would increase pressure elsewhere (e.g. Delta Road and Mincing Lane). The proposed remodelling would also appear to be for the benefit of through traffic to the detriment of the daily lives of Chobham residents.
- c. The HGV weight limit on Chobham High Street is routinely contravened, causing queuing and frustration. While planning permissions may have construction traffic conditions, in practice these conditions are rarely enforced and policing of the weight limit appears to be a low priority.
- d. Greater pressure on already stretched services, e.g. education, healthcare, cemetery, mains water, sewage and communications technology.
- e. Undermining the identity of Chobham by the creation of an out-of-context new village with “its own unique identity” with no sense of place within the Parish boundary. The Core Strategy recognises the rural and historic character of Chobham and states that limited development will be permitted only provided it is small in scale and respects the historic and village character.

6. Employment

Fairoaks Airport is seen as strategically important to the local and regional economy. It has a unique niche in the market in a convenient location and has been part of Chobham for many decades. Should the airport close, Surrey would lose one of only two general aviation airfields in the county, and this loss is likely to be permanent. The proposed development would cause the loss of all runway-dependent employment on the Fairoaks site. This is a prestigious specialist employment sector, unique in the Borough, with strong evidence supporting its active aviation operations, viability and growth potential as an airport.

7. Flood risk

Approximately one quarter of the site is in flood zone 2 and 3. This area of

functional floodplain must be allowed to fulfil its purpose and not be compromised by development. Flooding incidents occur at a rate higher than the published estimated probability in nearby Philpot Lane, causing damage to dwellings and property, and disruption on the roads. This area is an inappropriate location for large-scale development.

8. Natural environment

The site lies between the Thames Basin Heaths Special Protection Areas of Chobham Common and Horsell Common. It is unlikely that the proposed Suitable Alternative Natural Greenspace (SANG) would take the pressure off either Common. In fact, the neighbouring Commons are likely to be a more attractive alternative for dog walking and leisure by virtue of their unique nature, close proximity, larger scale and opportunity for a greater variety of walks and scenery to enjoy. This would present an obvious threat to this sensitive location which cannot be mitigated. In addition, the existing expanse of green space of the Fair Oaks site between the two Commons allows wildlife populations to naturally disperse and colonise.

9. Housing distribution

The proposed development is contrary to current policy on scale and distribution of new housing, which promotes development within settlement areas and states that if insufficient sites have come forward then release of sustainable sites in the Countryside beyond the Green Belt (not the Green Belt itself) will be the next option. Housing policy reiterates that development which would have an adverse effect upon the integrity of the European Sites will not be permitted. The Surrey Heath draft new Local Plan does not include Fair Oaks as a strategic site in its preferred approach, and is clear that it expects to meet its housing requirements without any housing development on the Fair Oaks site.

10. Design and character

The proposed design fails to respect and enhance the rural character of the area and the approach to Chobham village. There are sweeping views of the countryside throughout the larger non built part of the site, and this openness and green space helps maintain the overall rural character of the area. The design appears to aim to create an "island community" rather than encouraging links with the surrounding area and local services, and is unneighbourly in terms of its scale and density. The rural character of the surrounding network of footpaths and bridleways would be lost. The public right of way extending south from Bonsey's Lane has not been well safeguarded in the plans and appears to be particularly adversely affected, by becoming an urbanised route through a built area and crossing the main link road.

11. Heritage

It is felt that the airport's contribution to the heritage of Chobham has not been recognised in the application. The airport has been part of Chobham, its identity and economy for the greater part of 100 years and this value goes well beyond its buildings and WWII connections. Notwithstanding the fact that there is strong

local and wider support for retaining the site as an airport, it is felt that other buildings on site better represent the airport's heritage than those few chosen for retention.

12. "Garden Village"

The site is not a designated "Garden Village" and does not conform to the Garden Village principles as defined by the government, most notably with reference to the size of development and failure to secure meaningful community involvement and local support. The Planning Authority officers are on record as stating that in their view housing development would only be acceptable if it came forward as a Garden Village, which this is not. The widespread appropriation of the term "Garden Village" in the application documentation is deceptive.

13. Community engagement

Pre-application community engagement was ineffective and flawed, with the views of the community being misreported in feedback sessions and not reflected in the application documentation. The Parish Council also received various reports of residents being poorly treated at the community events. It is understood that active involvement of the community is a fundamental consideration and as such there should be no justification for approving the application without this element. The public's petition of over 5,000 signatures against housing development and in favour of encouraging airport operations on the Fair Oaks site must also be taken into account when assessing the views of the community.

14. Changes of use

The Parish Council objects to the proposed changes of use of the Blister Hangar, Pillbox and Gamekeeper's cottage. It is felt that the existing use of these elements better reflects their heritage value. The proposed change of use of the Blister Hangar to equestrian use is completely inappropriate given its position next to a proposed helipad and on the cusp of Flood Zone 3. The proposed change of use of the Gamekeeper's cottage to equestrian use is also completely inappropriate due to its position in a proposed high density housing area. Neither of the two buildings proposed for equestrian use appear to include any designated grazing land and the two buildings are remote from each other on the site. Greater detail about the equestrian strategy for the site is required in order for this part of the application to be properly assessed.

15. Helipad

The Parish Council objects to the proposal to include a helipad on the site. The plans show the proposed helipad to be within a few metres of housing and is therefore unacceptable from a design and noise perspective and akin to siting a new helipad within a settlement area. Residents of Chobham and the surrounding area are unlikely to gain much, if any, benefit of noise reduction if helicopter flying were to become the sole aviation use on the site. The reason for the inclusion of a helipad to retain some existing businesses on site is also disputed, as it is believed the majority of aviation-related businesses are runway-dependent (fixed

wing aircraft). As mentioned above, the helipad is also sited next to the Blister Hangar, which is proposed for equestrian use and these two uses are not compatible when sited together.

16. Community Trust

It is stated that a village management body or Community Trust would be established at hybrid application planning stage. The Parish Council is unclear as to whether this Trust has now been set up, but notes that it is proposed that the Trust will have far reaching duties, including being responsible for the SANG and open areas, bus services, financial management, asset management and community services. While the documentation sets out many aspirations for the Community Trust, there appears to be little practical information to enable an assessment of whether the model would be viable for this site.

It is anticipated that further representation will follow when the Parish Council has had chance to evaluate the documentation and other evidence in greater detail. In the meantime, if there are any questions or if further clarification can be provided on the above points please do not hesitate to contact me.

Yours faithfully



C L Cooper
Planning Administrator