



# CHOBHAM PARISH COUNCIL

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Development Control  
Surrey Heath Borough Council  
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Surrey GU15 3HD

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Dear Sir/Madam

## LETTER OF OBJECTION

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

Further to Chobham Parish Council's letter of 21<sup>st</sup> November 2018 setting out its initial objections to the above applications, further consideration has now been given to the application documentation and the potential impact of the proposed development. This letter sets out in greater detail the Parish Council's objections.

**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:

- A1) The A319 and A320, both of which are main ambulance routes, have a poor accident record, which includes fatalities in the last five years. Two fatalities have occurred at the point where the new junction onto the A320 is proposed. The proposed new 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. The A319 has had some 26 reported collisions (6 serious) between Chobham and Ottershaw in the past three years, and the A320 has had 32 collisions (6 serious) between the Six Crossroads and Ottershaw in the same time period.

- A2) 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 or 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.
- A3) There is an obvious risk of the proposed accesses, either alone or in conjunction with the cumulative impact of other proposed or projected developments in the area (further detailed in B4 below), 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.
- A4) The proposed Chertsey Road (A319) / Youngstroat Lane junction as existing is close to a sharp bend and 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 clear priority at this location.
- A5) 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.
- A6) 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.
- A7) The priorities for the pedestrian/cyclist crossings on the proposed junction to the A320 are unclear. No information appears to be given about what type of controls this junction would have for non-motorised traffic.
- A8) The proposed A320 access should be delivered in phase 1 rather than phase 2 of the development. The proposed link road is a key element of the plan, critical for construction traffic and the flow of traffic in and around the site from the start. The lack of priority given to the link road raises concerns regarding the risk of its non-delivery, which would have wide-ranging consequential impacts.
- A9) 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.

A10) The Review of Transport Matters submitted as part of the objection lodged on behalf of Fairoaks 2020 sets out a number of concerns in detail regarding the site accesses, including (in summary):

- a. Insufficient overall information to demonstrate that the designs comply with relevant design standards, with certain elements of the proposed junction designs cited as positively non-compliant.
- b. No demonstration that the accesses and junctions can accommodate all vehicle types that would use them, e.g. no information showing that swept paths for rigid/articulated vehicles can be accommodated.
- c. Lack of detail around the timetable for implementation.
- d. No evidence that the highway accesses have been approved by relevant highway authorities.
- e. Inadequate information regarding visibility sightlines at the proposed junctions, street lighting, signage, signalling and road surfacing.

The Parish Council recommends that all of the concerns relating to site accesses raised in this report are sufficiently considered and any missing/incomplete information be supplied before a decision is taken on this application. If this or any other required information is not supplied, inadequate or non-compliant, the application should be refused.

**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 (NPPF) and Surrey Heath Borough Council (SHBC) Core Strategy and Development Management Policies 2011-2027 and would have unacceptable negative impacts on the Parish of Chobham and the surrounding area.

**B1) Green Belt**

The proposal fundamentally conflicts with the purposes of Green Belt. The construction of buildings other than those allowed under paragraph 145 (exceptions) of the NPPF should not be approved except in very special circumstances.

The applicant has not demonstrated very special circumstances in support of this application. Each of the following six claimed circumstances as set out in the document "OPA10 Green Belt Assessment and Very Special Circumstances" do not constitute very special circumstances and, individually or cumulatively, would not outweigh the potential harm to the Green Belt:

- "Utilisation of Previously Developed Land within the Green Belt" – Existing policy (M21) allows for sensitive infill and redevelopment of the Major Developed Site (MDS) section of Fairoaks Airport, which is the only part of the site that can be considered as "previously developed". Since policy already allows for this utilisation, it cannot be considered a very special circumstance.
- "Enabling a continued and enhanced economic role of the Site" – The economic role of the site already has potential for limited growth. Beyond the

Green Belt constraints of the site, business and employment development can be directed to more appropriate sites. This is not a very special circumstance.

- “Creating a mixed residential community with no affordability gaps” – The creation of housing, or housing need, is not a very special circumstance. Ministers’ statements have made it clear that a lack of housing land does not constitute very special circumstances for enabling development on Green Belt land where it would not normally be permitted.
- “Provision of strategic open space providing wider local benefits” – The provision of Suitable Alternative Natural Greenspace (SANG) is a requirement of relevant housing developments and not a very special circumstance. The provision of SANG and restoring lost heathland habitats would in any case be unlikely to conflict with the purposes of the Green Belt.
- “Significant surface water drainage betterment and hydrological management” – This represents mitigation for the proposed development. Development mitigation is a requirement of relevant planning applications and does not amount to very special circumstances.
- “Creation of a new sustainable community enshrining Garden Village principles” – Garden Village principles are irrelevant to applications other than those for Garden Villages, which this proposal is not. The creation of a “new sustainable community” is essentially the same as the above “Creating a mixed residential community with no affordability gaps” and is not a very special circumstance for the reason already outlined.

Without very special circumstances, the proposal should be outright refused as it is clearly contrary to national planning policy. Notwithstanding this, the application also fails to accord with the fundamental aim of the Green Belt and all of its five purposes:

- a. It would create a sprawl of large built-up area with disproportionate expansion over the existing built form of the site.
- b. It would contribute to the merging of Chobham, Ottershaw and Woking.
- c. It would encroach on the countryside and bring about a significant loss of openness by building on a large part of the site which is currently green and open and which does not meet the definition of “previously developed land.”
- d. It would undermine the setting and special character of the Parish of Chobham.
- e. It would fail to assist in urban regeneration by the regeneration of derelict and other urban land, and in fact would do the opposite, by developing open countryside instead of derelict and other urban land.

## **B2) Sustainability**

The proposal is contrary to the principles of sustainable development, which seek to secure net gains across each of the overarching objectives, to include directing development to the most sustainable locations and planning in an environmentally responsible manner.

- a. In order for development of this scale to be sustainable, it should favour more central urban areas with existing transport links rather than designated Green Belt and out of town sites.
- b. The sustainable transport plans for the site appear unrealistic. In reality, residents will almost certainly use private cars for everyday journeys as is the case in nearby comparable settlements. Proposals for cycle schemes, club cars etc. are merely mitigation measures for the proposed development not being in a sustainable location, and uptake of such schemes can be neither guaranteed nor enforced.
- c. The site is not within walking distance of rail services and without frequent direct feeder bus services (no less than every 15 minutes) it cannot be considered properly sustainable. An employment centre of the scale proposed should be in a location with excellent public transport links to support sustainable commuting.
- d. It is understood that there are concerns around rail track constraints at Woking Station and its capacity to cope with additional passengers. At Woking Borough Council's Planning Committee meeting on 15<sup>th</sup> January 2019, letters from train networks to the Leader of the Council were mentioned, stating that there was no room to increase capacity due to restrictions at London Waterloo and platforms.
- e. It should be noted that as a comparator, Chobham does not generate sufficient demand for a high-frequency bus service, which would be required to make bus services compete effectively with the convenience of using a car. The limited bus service between Chobham and Woking is of little or no use for shift workers, chain journeys, evening journeys, short notice journeys or on Sundays and bank holidays.
- f. The site is being promoted as a standalone and sustainable community, but key community services and facilities appear to be either not provided or are insufficient for the proposed new community to meet its own day to day needs. For example, no on-site provision has been made for secondary education, standard GP surgery, places of worship, burial ground or supermarket. The applicant notes that the sports provision falls below the policy standard required for outdoor sports and proposes to potentially contribute to off-site sport provision. The applicant further proposes financial contributions for education and healthcare. It is noted that these would be considerable sums: £4,396,350 (in addition to the primary school proposed for the site) for education and £1,629,845 for new or extended healthcare facilities. No information appears to have been provided about the timetabling for these contributions.
- g. Great emphasis is placed on the expectation that many people will both live and work on the site, but there appears to be no priority schemes or supporting information about how this aspiration will be achieved. Without any way to guarantee or enforce a high level of self-containment, it is assumed that commuting habits will be broadly similar to those in the surrounding area which have a high reliance on private motor vehicles. Furthermore, it is unclear whether the types of jobs available on the site will be sufficiently well-paid for

employees to afford the housing on site together with the associated community trust fees.

- h. The proposed approximately 120-room hotel, with frontage on the A319 Chertsey Road, appears to be of an excessive size for a site designed to be predominantly self-sufficient, and in this location close to junction 11 of the M25 is likely to draw in additional motor vehicle traffic from the motorway network.
- i. The proposal fails to contribute to sustainable development's other environmental objectives by not protecting and enhancing the natural, built and historic environment. It urbanises a mostly green and open space and eradicates the existing built form and historical context of the setting.

### **B3) Aviation**

Fairoaks is strategically well-located and plays a vital role in the training of pilots, air traffic controllers and engineers. National policy is clear that the importance of general aviation should be recognised (NPPF paragraph 104f), and local policy continues to support the use and growth of Fairoaks as an airport and employment site, as it has done for many years.

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 Government's vision for General Aviation (GA) is clearly set out in its strategy document, which cites in an opening paragraph: "The Government's vision is of the UK being the best place in the world for GA as a flourishing, wealth generating and job producing sector of the economy." It further states that it intends to reverse the trend of decline in the sector and calls for encouraging planning authorities to "ensure that they take the economic and employment role local airfields play into account in their Local Plans and in all planning decisions." It is understood that the current network of GA airports in the UK is the minimum required to maintain and grow general and business aviation and flight crew training activity.

The Rt Hon Grant Shapps MP, on behalf of the All Party Parliamentary Group On General Aviation has noted in a letter dated 12<sup>th</sup> November 2018 that the Group considers that the loss of the airfield would fundamentally damage the network of GA airfields around London and have a devastating effect on general aviation in Surrey, as well as being contrary to national policy as outlined above. Amongst other concerns, it also highlights shortcomings and flaws in the York Aviation Report commissioned by the applicants and recommends an alternative plan to include retention of the aviation facilities. Due to the potential ramifications at national level, the Parish Council urges that the Minister for Aviation is consulted before a decision on this application is taken.

It should be noted that despite a lack of investment in airport infrastructure and facilities, the airport is an active General and Business Aviation Airport with a level of flight activity similar to regional airports such as Southend and Farnborough, and airports further afield such as Cambridge, Swansea and Cardiff. Hangar parking is at capacity, with opportunity to expand. Fairoaks is also the only location close to

London that can operate medical emergency flights 24 hours a day, 365 days a year.

Based on evidence the Parish Council has heard from users of the airport and other professionals in the GA field, it does not accept that the current operations of the airport are unviable. Unviability claims appear to be based on the split site ownership, which can be overcome. Furthermore, there exists developer interest to redevelop Fair Oaks for aviation use within development plan policy.

**B4) Highways and traffic**

The proposal would have an unacceptable impact on highway safety and traffic flow. The objections received from hundreds of members of the public offer evidence of the traffic misery endured by road users on a daily basis and this already untenable situation cannot be allowed to deteriorate any further.

- a. The introduction of a high volume of additional traffic onto an area of the road network that already suffers from extreme congestion would constitute a severe cumulative impact.
- b. The highways impact of this application, both alone and in combination with other approved and projected large-scale developments in the area, would represent an unacceptable increase in traffic volume and road safety. As a guide, the following table shows numbers of approved new dwelling units since 2015 within an approximate 4-5 mile radius of the Fair Oaks site (6.5 miles in the case of the major development at Princess Royal Barracks), plus projected large developments for Longcross South and residential towers in Woking town centre. The figures do not include applications which are yet to be determined or other large sites in the immediate vicinity which have been identified as having potential for housing development of around 100-500 units each.

1932	Chobham and Woking area approved
944	Runnymede approved
1808	Longcross approved & projected (108 north + 1700 south)
1200	Princess Royal Barracks, Deepcut approved
<b>5884</b>	<b>Total approved + Longcross South projected</b>
940	Woking tower developments indicative figure
<b>6824</b>	<b>Total including Woking tower developments</b>

- c. The poor accident record of the A319 and A320 is testimony to the existing inadequacy of these roads (see accident figures in paragraph A1). There is an obvious risk of “rat runs” being created throughout the local area, with Philpot Lane particularly vulnerable.
- d. Recent press reports have noted excessive jams on the A320 caused by traffic from the neighbouring McLaren Technology Centre. McLaren has reportedly been working on a “range of ideas” to help alleviate the problem but it is apparent that this major employer is struggling to find solutions. On the

employment side alone, the 1,200 net additional jobs proposed for the Fair Oaks site is broadly comparable to the circa 1,000 currently employed at the McLaren site with potential to have the same or greater impact on local roads. It should be noted that the development of McLaren's new 57,000 square metre Applied Technology Centre is also reported to be creating around 250 new jobs on the site.

- e. 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.
- f. The proposal to ban right turns from the A319 Chertsey Road onto the B393 Windsor Road would inevitably cause rat runs through residential roads and u-turns on the mini roundabout to the south, which can already be chaotic. Additionally, the section of the High Street immediately following a left turn (the proposed only option) from Chertsey Road is markedly prone to flooding from the Mill Bourne river, including flooding events which have caused the road to become impassable. There can be no justification for removing road users' existing ability to turn right from one trunk road to another, when no alternative suitable route is available. This scheme is wholly unacceptable and unfit for purpose as a mitigation measure.
- g. The proposed option to install traffic signals on the junction of the A319 Chertsey Road and B393 Windsor Road fails to acknowledge that in 2017 Surrey County Council rejected an option for traffic signals for the junction on that grounds that "the modelling of the junction showed that signals would increase congestion in the area rather than reduce it". Furthermore the options proposed by the applicant for this junction and the scheme proposed for the Vicarage Road/High Street junction fail to take into consideration the setting of the listed buildings in these locations and the Conservation Area designation.
- h. 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.
- i. As set out in paragraph A4 there are safety issues associated with the proposed bridleway and footpath linkages, where existing problems would be exacerbated.
- j. Accessibility for pedestrians, horseback riders, cyclists and the needs of people with reduced mobility appear not to have been given suitable priority both within the scheme and in the proposed mitigation schemes for Chobham.
- k. The link road, a critical element of the overall development, appears not to have been given suitable priority in the plans. Its scheduling in Phase 2 of the development and exclusion from the environmental assessment raise a risk that it will not be delivered at all. The link road and associated A320 junction must be brought forward to an early stage in order to guard against the potentially substantial impacts of it not being delivered at all.

- l. The Review of Transport Matters submitted as part of the objection lodged on behalf of Fair Oaks 2020 raises multiple concerns, including issues around the validity of the trip generation figures, a lack of detail around the implementation timetable and other problems with the application documentation. It concludes that the submitted transport information is not fit for purpose. The Parish Council recommends that all of the concerns raised in this report are fully considered before a decision is taken on this application.
- m. The objections to the means of site accesses (A1-A10) above are reiterated as objections on highways and traffic grounds in respect of part (b) of the hybrid application.

#### **B5) Impact on Chobham and its residents**

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 in B4 above.
- b. 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 the weight limit is not policed due to lack of resources.
- c. Disruption and disturbance created during a decade-long construction project including noise, vibration, pollution, effects on local business and impact to livestock and wildlife. Residents of Bonsey's Lane, Philpot Lane and part of Chertsey Road would be particularly at risk of harm and significant negative impacts.
- d. Increased air pollution, noise pollution and light pollution from the creation of a new urban environment.
- e. Substantial additional pressures on already stretched and in some cases inadequate services, e.g. education, healthcare, cemetery, mains water, sewage, communications technology, waste and recycling. Chobham's Medical Practice has relatively recently spent months closed to registration of new patients and has noted its vulnerability in respect of increasing patient list size.
- f. 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 or integration within the Parish. 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.
- g. Further negative impact on the rights of way network. The long established footpaths and bridleways in Chobham are becoming increasingly marred and encroached upon by development. It is important these walks and routes are kept open and attractive for the exercise and wellbeing of current and future generations, and to continue to draw in visitors to Chobham's pubs, restaurants and local shops. Chobham's footpath links to Horsell Common which are among the most rural and unspoilt in the Parish would be irreversibly ruined.
- h. The unnecessary loss of a unique and valued local facility for residents and visitors involved in aviation for business or with an interest as a hobby. An

accessible local airfield such as Fairoaks also inspires children to take an early interest in aviation, technology and engineering, and helps raise their career aspirations for the future.

- i. Potential to undermine future planning for growth and development in Chobham at a strategic level.

#### **B6) Employment**

Fairoaks Airport is strategically important to the local and regional economy. It has a distinctive niche in the market in a well-located site 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 would almost undoubtedly 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. The majority of lost businesses are unlikely to be able to relocate in the wider south east area as claimed, for reasons such as lack of capacity, exclusivity of existing arrangements and unsuitability of facilities.

Employment growth can be achieved within the MDS part of the airport site without the closure of the airport and without the addition of housing. Current and emerging policy allows for enabling infill and/or redevelopment of employment land at Fairoaks Airport, with appropriate restrictions to avoid material harm to the Green Belt.

#### **B7) Flood risk and drainage**

Approximately one quarter of the site is in flood zone 2 and 3. Areas of functional flood plain within the site must be allowed to fulfil their 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.

The NPPF, through its sequential test, aims for development to be steered to areas with the lowest risk of flooding. The NPPF states: "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding". The applicant appears to have failed to demonstrate that there are no reasonably available alternative sites with a lower risk.

Notwithstanding that the sequential test should first be passed, the application also fails to accord with the requirements of the exception test. For the exception test to be passed, it should be demonstrated that "the development would provide wider sustainability benefits to the community that outweigh the flood risk; and "the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall." The applicant appears to have failed to demonstrate wider sustainability benefits or that it will be safe for its lifetime.

The Environment Agency objects to the proposal through its consultation response, citing an inadequate flood risk assessment (FRA) and concerns around risks to nature conservation (covered in point B8 below). The agency draws attention to the fact that parts of the site are within flood zone 3b, the functional flood plain, where no development other than water compatible and essential infrastructure should be allowed. Among its objections are a lack of compliance with the NPPF due to failure to assess the impact of climate change and loss of flood plain storage.

The drainage engineer's consultation response raises several concerns regarding the proposal and recommends refusal. It details shortcomings in the drainage plans for the link road through the site and recommends that adoptable access road details are submitted and approved independently, prior to the development application. Further concerns are raised around flood plain, ecology and general drainage issues, including that the ecology area and ponds are located in the area most likely to flood, with an associated risk that ecological enhancement could be partially or totally washed away by flooding.

A further concern around flooding has been raised above in paragraph B4(f) relating to one of the traffic mitigation schemes within Chobham which proposes to ban right turns from the A319 Chertsey Road onto the B393 Windsor Road, and route all traffic onto a section of the High Street which is in flood zone 3 and known to become impassable during severe flooding events.

**B8) Natural environment**

Outside of the MDS, the Fairoaks site is overwhelmingly green and worthy of continued protection within the Green Belt. It is high quality countryside, rich in rare species and habitats, and its destruction must be resisted.

The site lies between the Thames Basin Heaths Special Protection Areas of Chobham Common and Horsell Common. It is unlikely that the proposed SANG would take the pressure off either of the two Commons. 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 Fairoaks site between the two Commons currently allows wildlife populations to naturally disperse and colonise relatively free from threats including those from domestic animals, and should be protected.

The Parish Council supports Natural England's preference for SANGs to be handed over to local authorities to ensure that management is carried out fairly and effectively and funding is secured in perpetuity. SANG land should be accessible for all and not de-facto restricted to communities of the development to which it relates. The areas of proposed SANG already have recognised nature conservation importance, and the Parish Council is not satisfied that the site can accommodate the proposed recreational usage without adverse effect. The Council reiterates its concern that the close linkages into walks leading to the

Special Protection Area (SPA) may have the effect of driving additional visits to the SPA rather than mitigating against them. Furthermore the risks to the SPA from the proposed development are not limited to residential (and quasi-residential) development. The large increase in employees and visitor numbers represents additional associated risks to the SPA from littering and fires from cigarette butts etc. Overall it is contended that the proposal would cause a likely significant effect on the integrity of the SPA.

There is particular concern that the environmental effects of the proposed link road have not been evaluated at all. Since the link road is planned for Phase 2 of the development, the Council is concerned that there is significant risk that it may be delayed or not built at all. The environmental impacts should therefore be fully evaluated for all possible scenarios, including those arising from a delay or non-delivery of the link road.

It is noted that the Environment Agency objects to the proposal on the grounds of the assessment and mitigation of the risks to nature conservation being incomplete and insufficient information to show compliance with the NPPF paragraph 170. It details its reasons for objection as including:

- Fragmentation of green infrastructure (which includes watercourses and their river corridors) due to the proposed link road through the site;
- Failure to assess all impacts, particularly on watercourses (including potentially lost watercourses) within and adjacent to the site, and failure to identify enhancements to the watercourses;
- Potentially inadequate buffer zones to watercourses and lack of differentiation between the ecological buffer and the area of open space and sustainable urban drainage systems (SuDS).

The application also fails to comply with national and local policy due to damage and disturbance to ancient woodland and veteran trees. Attention is drawn to the consultation response from the Woodland Trust in this regard.

The report from Ethos Environmental Planning submitted as part of the objection lodged on behalf of Fair Oaks 2020 details omissions, shortcomings and flawed methodology in the applicant's submitted ecological surveys. The findings are extensive and it is urged that each of the points raised is investigated and addressed before a decision is taken on this application.

#### **B9) Housing need and distribution**

The proposed development is contrary to policy on scale and distribution of new housing, which promotes effective 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 (i.e. not the Green Belt itself) will be the next option.

- a. The proposal is located outside of existing settlement boundaries and does not conform to the spatial strategy. Local policy acknowledges that development in

accordance with its spatial strategy provides the most sustainable approach to accommodating growth.

- b. Housing policy reiterates that development which would have an adverse effect upon the integrity of the European Sites will not be permitted. The Parish Council maintains that the proposal would be likely to cause significant effect on the integrity of the SPA.
- c. SHBC already has a solution for its housing supply as set out in its emerging Local Plan. It does not include Fairoaks as a strategic or other allocated site in its preferred approach, and is clear that it expects to meet its housing requirements without any housing development on the Fairoaks site. There can be no justification for large-scale urban development of greenfield land within the Green Belt under these circumstances.
- d. This application potentially undermines the Local Plan-making process, by predetermining the scale of development.
- e. A significant number of new dwellings have been proposed for Chobham since this application has been lodged, including Castle Grove Nursery (40 units) and Mincing Lane Nursery (30 units). Should these developments be granted, then the remaining identified housing need should be recalculated accordingly.
- f. The “Young People’s Focus Group” summarised in the Statement of Community Involvement was said to have been attended by one young couple and a retired public sector worker. The findings from this exercise are anecdotal and cannot be considered to properly identify the needs of young people. No evidence is offered that housing on the Fairoaks site would be any more affordable for young people than properties currently available in the locality. It is widely recognised that young people require affordable housing in towns such as Woking and Camberley where services, social activities, retail hubs and transport are readily available.
- g. It is noted from the Housing Services Manager’s published comments that vacant existing affordable properties in the area have recently been cascaded out of Parish, Borough and neighbouring Boroughs, as it has not been possible to fill them. Claims that this application would contribute to meeting a very local need therefore appear to be unfounded.
- h. The Housing Services Manager also points out flaws in the “no affordability gaps” premise and raises a number of other issues regarding the mix and tenure of the proposed housing. It is noted that the proposal is for 58% 3, 4 and 5 bedroom homes, with a quarter being 4 and 5 bedroom homes. This does not appear to be addressing local need.
- i. There appears to have been no consideration of the accommodation needs of the Gypsy and Traveller and Travelling Showpeople communities in the application material.

#### **B10) Design and character**

The proposed design fails to respect and enhance the rural character of the area and the approach to Chobham village, and does not appear to have made suitable considerations towards its context in the landscape. There are presently sweeping views of the countryside throughout the main part of the site (that which is not

subject to the MDS designation), and this openness and green space is critical to maintaining the overall rural character of the area. The proposal would create harmful visual impacts from the surrounding public rights of way, and the views and vistas across the landscape from Chobham Common and other higher ground further afield would be significantly marred.

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. As mentioned above, 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 towards the McLaren Technology Centre is a unique open walking route with historic interest which has not been well safeguarded or treated with sensitivity in the plans. It is reduced to an indistinctive urbanised route through a fully built area, crossing the main link road.

The proposed creation of two discrete SANG areas separated by the main link road creates unnecessary fragmentation and loss of opportunity to maximise wildlife linkages. It is noted that at least part of the area proposed for SANG is prone to flooding which is likely to render it unfit for purpose at times.

The proposed sports pitches are poorly located in an area liable to flooding and local demand for the particular facilities proposed does not appear to have been adequately documented. Other design issues have been raised under separate headings in this response, e.g. proximity of helipad to equestrian facilities, fragmentation of equestrian facilities and ecology measures located in the area most likely to flood.

#### **B11) 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 and resisting the large-scale demolition of the majority of its buildings, the few buildings chosen for retention in this proposal would appear to do little to achieve the aim of providing a historical reminder of the site’s previous use as they would be minimised and out of context amongst the rest of the development.

The proposed site’s overall impression is of a placeless housing estate which has failed to reflect the site’s unique historic landscape and identity. Opportunities to restore and enhance significant buildings such as the existing control tower, WWII hangars, hangar café etc. have been dismissed with inadequate explanations such as “poor condition” and “not compatible”. The legacy of the airfield has been all but completely eradicated in the plans.

It is noted that the existing runway was considered to be brought forward as part of the alignment of the new village, but rejected as “detrimental to the planning”, again overlooking an opportunity to retain an important part of the site’s character. The Design and Access Statement’s note that the runway did not exist during WWII and was constructed in 1970s appears to show disregard for the importance of maintaining our historic linkages from more recent history such as the 1970s.

The Conservation Officer’s report, which recommends refusal, notes that the change of the use of the site has not been fully justified and raises multiple concerns around the site’s design, impact and lack of compliance with heritage policy.

The proposed wider traffic schemes for Chobham village show no consideration or sensitivity towards the Conservation Area and the many listed buildings around the junctions of Chertsey Road, Vicarage Road and the High Street, and seek to inappropriately further urbanise the setting.

**B12) “Garden Village”**

The site is not a designated “Garden Village” and does not conform to the Garden Village criteria and principles as defined by the government. It fails on most counts, including:

- size of the settlement;
- failure to secure meaningful community involvement and local support;
- failure to meet a local need;
- failure to make effective use of brownfield land (by proposing to build on mainly greenfield land);
- failure to demonstrate that it meets infrastructure needs.

The Planning Authority is on record as stating that in the view of its officers housing development would “only be acceptable if it came forward as a garden village, where the vision and principles have been developed in conjunction with the local community” (source: future of Fairoaks Airport briefing note for Councillors). This is clearly not the case in this application.

The widespread appropriation of the term “Garden Village” throughout the application documentation and the titling of the proposed development as “Fairoaks Garden Village” is deceptive and implies a certain level of government support when in fact the site previously failed to achieve backing as a Garden Village. The continued use of the term “Garden Village” in marketing, consultation and application material following the site’s rejection is unjustified and misleading. The proposal should be accurately and unambiguously described throughout in order for it to be assessed without the inference that it meets Garden Village standards.

**B13) Community engagement**

The local community has not been effectively involved in developing the vision for the future of the airport site, and fundamental issues important to local people have not been properly addressed in the application. 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 a number of reports of residents being poorly treated by agents of the applicant at the community events.

It is noted that active involvement of the community (not merely consultation) is considered by the Planning Authority to be a fundamental and foremost principle to be addressed, and as such there should be no justification for approving the application without this element being fulfilled. The public's petition of over 5,000 signatures against housing development and in favour of retaining airport operations on the Fair Oaks site plus the several hundred registered letters of objection must also be taken into account when assessing the views of the community.

It should be noted that the published letters of support are overwhelmingly not from residents in the vicinity of the site and appear to make no substantial representations on planning grounds. No letters of support from residents of neighbouring Chobham and Ottershaw appear to have been received to date. All but a small number of the representations in favour appear to be from employees of Harvey Water Softeners and potential customers of Prime Acrobatics. The potential relocation and/or expansion of a company is merely an indication of interest and cannot be guaranteed or enforced. In the case of Harvey Water Softeners, there appears to be some uncertainty over the future of its UK operations following recent changes of Directorships to individuals outside of the UK and an apparent new ownership of the company. Under the circumstances, these letters of support should not form part of the basis for the destruction of valued Green Belt land.

#### **B14) 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 and aviation context 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 entirely inappropriate due to its position in a proposed high density housing area.

The two buildings proposed for equestrian use are remote from each other on the site and both are remote from the two fields designated as grazing pasture land. This fragmentation of equestrian facilities represents an impractical and unworkable approach not well related within the proposed scheme.

#### **B15) Helipad**

The Parish Council objects to the proposal to include a helipad on the site. The plans show the proposed helipad to be adjacent to a residential area which is unacceptable from a design and noise perspective and akin to siting a helipad on

the border of a settlement area, which would be contrary to policy on residential amenity. The planning statement's finding that there would be a "negligible/not significant effect" (paragraph 7.477) in respect of the noise impact of the helipad is strongly disputed. Existing residents of neighbouring properties and in the vicinity 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 noise factor, in combination with other unneighbourly aspects of the application, would cause significant detrimental effects on the residential amenity of existing dwellings. As mentioned in B14 above, the helipad is also sited next to the Blister Hangar, which is proposed to be retained for equestrian use and these two uses would be mutually incompatible.

The stated 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), or may not be compatible with limited/reduced helicopter operations. Due to its constrictions the proposed helipad facility would also offer little opportunity for future development and growth, which is not the case for helicopter operations within the current wider airfield context.

The objection lodged on behalf of Fair Oaks 2020 details additional concerns regarding inappropriate siting, impracticality, safety issues and other constraints to helicopter operations as part of the proposed plan. It considers that an operation licence from the CAA is unlikely to be granted in the proposed setting. The Environmental Health Officer is also not satisfied that the noise impacts of the proposed helipad would be acceptable.

#### **B16) Community Trust**

It is stated that a village management body or Community Trust would be established at hybrid application planning stage. The Parish Council remains unclear as to whether the Trust has indeed 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 seems to be little practical and financial information to enable an assessment of whether the model would be viable for this site. The Parish Council has, for example, found no indication of the annual levy sums to be paid by residents and businesses.

There appears to be no suggestion as to how the Community Trust would integrate or work alongside the Parish Council within the Parish of Chobham, given that there may be an overlap in some of the proposed duties and responsibilities. In effect it appears designed to further segregate the proposed new community from the rest of the Parish and the neighbouring areas. No information can be found of opportunities to provide services, benefit or links to the wider community. The proposal that the Trust directorship includes short-term representation from "Chobham or Ottershaw Parish Council" (page 6, Community Trust Outline Business Plan) is confusing, since Ottershaw has no Parish Council. Chobham

Parish Council can confirm that it has to date received no approach to provide any representation or nominee for the Community Trust.

- B17) The Parish Council recommends outright refusal of the application based on what it believes to be overwhelming non-compliance on planning grounds as set out above and in the many other representations made by statutory bodies, organisations and members of the public. It recognises, however, that development of some form may come forward and be approved for the site. For any large-scale development that is approved, the Parish Council would expect a robust set of fully enforceable planning conditions, to include the following:
- a. Footpaths and bridleways to be kept open and safe for all users;
  - b. Ensure construction HGVs are routed away from Chobham village centre, and vehicles servicing the site are not allowed to cause obstruction by parking or waiting on the highway network;
  - c. Hoardings and signage to be of appropriate appearance in a rural setting with no internal illumination and not allowed to encroach onto public land;
  - d. Any damage affecting Chobham's land, infrastructure or its residents and businesses caused during development to be made good within a reasonable period;
  - e. Wildlife habitats to be appropriately safeguarded and disturbance to the SPA to be minimised;
  - f. Ditches and watercourses to be kept open and construction methods not to impede the flood plain;
  - g. Restrict or remove permitted development rights to ensure the openness and character of the area is not further undermined;
  - h. Materials to be of good quality and consistent with the local area;
  - i. Planting to be of native species consistent with the local area;
  - j. Fences, gates, walls and other built enclosures to be in keeping with the rural character of Chobham;
  - k. The predominance of trees and hedges lining the A319 Chertsey Road to be maintained and no material increase in urbanising features;
  - l. A requirement that if there is a change to the number of units (lower or higher density), employment floorspace, phasing order or other material change in the plans (e.g. the removal of a key feature such as the proposed primary school, any of the access junctions or the SANG visitor centre) then a fresh application for the whole site should be submitted.
  - m. A requirement that the accesses, link road and other main traffic routes are built prior to any new housing or employment space expansion being commenced, together with drainage, sewage and other essential infrastructure.

The Parish Council has noted that there have been some issues with the online publication of letters of representation on the SHBC website, which has resulted in anomalies in the reported number of representations received. The Council trusts that this problem has now been rectified and that no letters or responses have been lost or remained unpublished in the process.

It is also noted that a further time extension for determination of the application has been agreed until 15<sup>th</sup> November 2019, citing “continued delays with key consultees (including County Highways, Highways England and the EA)”. Additional information from the applicant has been requested by several consultees such as Highways England (request made 16<sup>th</sup> November 2018), the Environment Agency (3<sup>rd</sup> December 2018), Natural England (21<sup>st</sup> December 2018) and County Highways (28<sup>th</sup> February 2019), and without this information these consultees are unable to provide fuller responses.

It is understood that as well as the additional material requested by statutory consultees, further consultation material in respect of the Fair Oaks site is likely to follow. The Parish Council will consider any additional or replacement material and may submit further representation in due course. Please could the Parish Council also be notified of the date of the Planning Applications Committee meeting at which this application will be considered and of the deadline for registering with the Council its desire to speak.

On a final point, the Parish Council has read the update note published by Runnymede Borough Council (RBC) on 22<sup>nd</sup> March 2019 concerning matters relating to the A320 corridor in respect of its ongoing 2030 Local Plan examination. It has seen that RBC has gone on record stating that there is now increased certainty that the Fair Oaks development site “will not be progressed at all, or until after the Local Plan period”. The Parish Council is unaware of any new evidence which has brought about this increased certainty and has written separately to the Programme Officer for the examination seeking clarity in this matter, as the evidence behind this statement would appear to be a critical material consideration in the case and of significant public interest.

If there are any questions or if further clarification can be provided on any of the above points please do not hesitate to contact me.

Yours faithfully



Ms C L Cooper  
Planning Administrator