



CHOBHAM PARISH COUNCIL

Clerk, Chobham Parish Pavilion, Recreation Ground, Station Road
Chobham, Woking, Surrey GU24 8AJ

Tel: 01276 856633

Email: planning@chobhamparishcouncil.org Website: www.chobhamparishcouncil.org

13th September 2022

Planning Policy
Surrey Heath Borough Council
Surrey Heath House
Knoll Road
Camberley
Surrey GU15 3HD

By email: planning.consultation@surreyheath.gov.uk

Dear Sir/Madam

Draft Surrey Heath Local Plan

Preferred Options (2019 - 2038) Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople Regulation 18 Consultation

Thank you for the opportunity to comment on the above consultation. Chobham Parish Council has reviewed and discussed the consultation material, listened to feedback from interested members of the public and taken into consideration both existing and historic planning situations in Chobham. This is reflected in the Council's response.

The Council extends its thanks to Surrey Heath Borough Council (SHBC) officers for holding an extended in-person public engagement event in Chobham on 7th September. It is noted that this was very well attended by local people with constant visitors throughout the 6-hour session, and a number of themes consistently raised as areas of concern.

In addition to this, and among other sources, while preparing its response the Council has given regard to the following policies and guidance:

- The National Planning Policy Framework
- National Planning Policy for Traveller Sites
- Draft Surrey Heath Local Plan 2019-2038
- Designing Gypsy and Traveller Sites Good Practice Guide (while noting that this publication was withdrawn in 2015, Surrey Heath's own 2022 Topic Paper recognises that it remains a useful resource).

The Council understands that for the new Local Plan to be legally sound, it is important that housing plans are fully explored for the whole of the Borough's community, including the Gypsy and Traveller and Travelling Showpeople communities. It supports a positive approach to allocating sites, and recognises that the planning constraints in the borough mean that the identification of suitable sites is particularly challenging. It notes that an extensive amount of work has been undertaken in connection with site identification.

Whilst being sympathetic to the challenges faced, a considerable number of concerns have been raised in response to the site allocation proposals, both from a general perspective and in specific relation to the two proposed allocated sites themselves at Land South of Broadford Lane and the Bonds Drive extension. The Council does not support these two site allocations in Chobham. The concerns are such that it is believed the realistic deliverability prospects of both sites is in question. The Council's comments are set out below in the consultation's prescribed format:

Question 1 – General Comments and Suggestions

- Do you have any general comments relating to the proposed Gypsy, Traveller and Travelling Showpeople Site Allocations?**
- Do you have any suggestions for site allocations that are not currently identified?**

Green Belt

- It is felt that the allocation of two further sites within Chobham (one being an extension) represents a significant weakening of the effectiveness of the Green Belt resulting in unnecessary fragmentation, both separately and in combination with the anticipated insetting of Chobham village. National commitments to protect and enhance the Green Belt should be made a priority and given great weight in the actions of local authorities.
- Protection of the Green Belt was reflected and precedent was set in the Inspector's Report on the Examination of the Runnymede 2030 Local Plan, which allowed a shortfall in provision of plots for Travelling Showpeople due to Green Belt and other constraints.
- There would appear to be no suggested measures to help offset the proposed loss of Green Belt land by way of environmental enhancements, increased access for the public or other improvements to land in Chobham's remaining Green Belt.
- There is a lack of detail in the consultation regarding the exceptional circumstances being proposed to warrant an alteration to Green Belt boundaries. It is understood that both strategic and local level exceptional circumstances are required. With housing need being a strategic circumstance, more information is required regarding local level exceptional circumstances. That information is fundamental to the allocating of sites within the Green Belt, and a key consideration for local people. If it was not possible to include it within this consultation, then it should be made available for consultation separately before the Local Plan progresses to Regulation 19 stage.
- It is unclear why it is proposed to remove the sites from the Green Belt. If "exceptional" circumstances can be demonstrated to remove sites from the Green Belt, then it is felt

that “very special” circumstances could be presented instead to make a case for allowing their development within the Green Belt as was the case with existing sites. It is felt that the removal of land from the Green Belt should be an absolute last resort.

- As stated in the Parish Council’s response to the May 2022 Draft Surrey Heath Local Plan consultation, there is concern that the amount of new housing proposed overall is unrealistically high when considered in terms of the constraints within Surrey Heath borough. This applies proportionately to the new housing requirements set out for the Gypsy and Travellers and Travelling Showpeople communities. The Parish Council would support the Borough Council should any opportunity arise to secure an overall reduction in targets to reflect the planning constraints.
- The Parish Council would support SHBC if it is minded to make further efforts to secure the release of unused or underused Ministry of Defence land in the borough. It is felt that this is an area where a good solution to providing appropriate sites in this heavily constrained borough could be found, particularly with the commitments to finding sites coming from government level.

Range and Mix of Housing

- The additional site allocations would result in a further over-concentration of the borough’s accommodation of this type within Chobham parish, with some 60.9% (min) to 64.8% (max) of the total pitches/plots compared to the current 56.8% which is already disproportionate for the parish in relation to the borough.
- Similarly, the site allocations would result in the ward of Windlesham and Chobham being scheduled to accommodate 90.6% (min) to 91.5% (max) of the borough’s total number of pitches/plots.

	Number of pitches or plots		
	Existing	Proposed min.	Proposed max.
Bonds Drive	6		
Bonds Drive extension		5	9
Broadford Lane		13	16
Diamond Ridge Woods		4	4
Kalima	15		
Land south of J3 of M3	2		
Swift Lane	14		
Swift Lane extension		5	5
<i>Total pitches or plots</i>	37	64	71
% in Chobham parish	56.8%	60.9%	64.8%
% in Windlesham and Chobham ward	94.6%	90.6%	91.5%

- These calculations are potentially underestimates in certain circumstances, for example if Diamond Ridge Woods were to fail to come forward, and/or if additional sites within Chobham are approved. There is currently a planning application in progress for a site in Highams Lane (and an enforcement notice appeal in progress for the same site) and there are other unauthorised sites in Chobham with the potential to become regularised. There are other existing and proposed sites very close to the Chobham boundary in the neighbouring boroughs of Woking and Runnymede.
- For local plan preparation, the planning authority is required to “relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density”. It is felt that the proposed resulting distribution of pitches/plots does not relate proportionately to the population size and density of Chobham (both as a parish and as part of the ward of Windlesham and Chobham).
- The February 2019 Government response to the consultation on powers for dealing with unauthorised development and encampments states “(...) the Secretary of State will be prepared to review cases where concerns are raised that there is too high a concentration of authorised traveller sites in one location”. The Parish Council urges that at submission stage a full Secretary of State review takes place in this regard.
- Notwithstanding the challenge of land availability, SHBC was previously of the view that smaller sites (4-6 pitches/plots) could be the way forward (Gypsy/Traveller Accommodation Plans public meeting October 2013). The proposed site allocations as they now stand would result in 3 relatively large sites in a single parish (4 in a single ward) which goes against the expected approach.
- In the Parish Council’s response to the May 2022 Draft Surrey Heath Local Plan consultation, it was raised that the Range and Mix of housing policy (H5) did not appear to include anything to manage possible undesirable effects of an over-concentration of any one type of housing in a localised area.
- With policy H5’s aim of building balanced and mixed communities, it would be expected that policy H11 should reflect this by having a requirement designed to prevent an over-concentration of any one type of housing accommodation in a localised area, and consequently an under-supply (or nil supply) elsewhere in the borough. The travelling community have virtually no options to live elsewhere in the locality than in or around Chobham, which goes against the principles of fair and equal treatment.
- Several residents have reported that at the time the Kalima site was built, SHBC gave its word that Chobham would not be required to accommodate any further sites. While it is accepted that this assurance would likely have been made in good faith at the time, and that development policies etc. have moved on, it must be recognised that for some members of the public this has undermined trust in the planning authority.

Housing needs

- With a significant proportion of the unmet need understood to be arising from existing sites, there is concern regarding the likely increased next generation of need and thereafter. Ensuring that sites become more evenly distributed throughout the borough

now would likely help avoid potential even greater planning and infrastructure challenges in future.

- If the sites were to go ahead for development, it is unclear whether prospective residents of the new pitches and plots would need to demonstrate a strong local connection, both upon first occupation and subsequent occupations. There is concern regarding a risk of people without local connections moving in to occupy the sites, leaving Surrey Heath with some or all of the unmet travelling community need that the allocated sites were intended to address.
- Although it is noted that there is an allowance for windfall sites, if other planning applications for Gypsy and Travellers and Travelling Showpeople sites are approved that help address the unmet need, it is felt that it would be reasonable to consider whether the extent or density of allocated sites could be reduced, particularly if it would result in an improved balance of range and mix of housing throughout the borough.
- It is noted that at examination stage of the Runnymede Local Plan (adopted 2020), the Inspector considered that the supply of pitches for Gypsies and Travellers could exceed the borough's need, while a shortfall in allocated plots for Travelling Showpeople was considered justified due to the Green Belt and other planning constraints. With pitches anticipated to be coming forward just outside of the Chobham parish boundary at Longcross Garden Village, has Runnymede been specifically asked to assist in meeting Surrey Heath's pitch shortfall under the duty to co-operate?

Planning and enforcement

- There is a lack of planning policy information regarding the type of measures proposed to "reduce tensions between settled and traveller communities", which is one of the Government's aims in its planning policy for traveller sites. It is clear from listening to feedback that this is an area of key concern from members of the settled community in Chobham.
- There has been previous difficulty in ensuring compliance with maintenance conditions at the existing site at Kalima, with both SHBC and Surrey County Council (SCC) each stating that the other is responsible for compliance. This situation where authorities' roles are unclear or conflicted must not be allowed to be repeated for any potential future sites. It is also felt that any enforcing body should be separate from site ownership/management.
- Concern is raised that the objective of reducing the number of unauthorised developments and encampments and making enforcement more effective would be likely to fail. By having a such closely-located cluster of sites and increasing the Gypsy and Travellers and Travelling Showpeople population within the same general area, it has the potential to make the locality and sensitive areas of land more at risk of unauthorised encampments and transit incursions.
- The Parish Council made a number of comments relating to infrastructure concerns in its response to the May 2022 Draft Surrey Heath Local Plan consultation, including concerns around local healthcare availability, school places, school transport, sourcing

of burial land, physical infrastructure, water stress and more. These concerns apply equally to the whole community, including the Gypsy and Travellers and Travelling Showpeople communities.

Suggestions for site allocations not currently identified

- The Parish Council supports meeting future needs by provision being made strategically through new housing developments of 100 homes or more, subject to that provision being via off-site land or commuted sum payment towards off-site land in instances where on-site provision would further increase the over-concentration of pitches/plots in one area. In areas of under-supply or nil supply, consideration could be given as to whether strategic provision should be required for developments of fewer than 100 homes.
- Any commuted sum payment should reflect the realistic cost of land purchase and developing sites. A calculation hierarchy should be published detailing how many pitches/plots are to be provided relative to the size of development, potentially with incentives for increased provision in areas with an under-supply or nil supply.
- It is felt that there have been missed opportunities in recent years to provide pitches and plots via strategic development sites in the borough, which has contributed to the current need. The provision of sites via this route should be non-negotiable as it is for affordable housing. Developers of major sites must also not be allowed to be split sites and develop them in a piecemeal manner to avoid policy obligations.
- A residents' group in Chobham is putting together an extensive list of suggested alternative sites and will be submitting this in response to the consultation. While the Parish Council is not in a position to advise on the potential suitability or the availability of any of the land, it is urged that the planning authority follows up each of the suggestions.
- It is noted that following the March to May 2022 consultation, elected Borough Council Members were asked to put forward site suggestions, but only 7 suggestions were made in total by 35 Councillors with combined fine-grain knowledge of the entire borough. It is felt that it would not have been unreasonable for each of the 35 elected Members to have been tasked with putting forward at least one suggestion for consideration.
- Chobham Parish Council was not approached during this process other than via the Call for Sites public consultation, but it has reviewed its own land and land it maintains, none of which is available for development. The following is a complete list of the land:
 - Chobham Burial Ground – in use as cemetery.
 - Chobham Burial Ground extension (previously allotments) – required for future burials.
 - Jubilee Mount – in active use as public woodland area and within the 400m Special Protection Area buffer where no new residential development is allowed.
 - Chobham Community Centre land – in active use as Community Centre and associated car parking.

- Benhams Corner (Chobham Museum to Stearns Bus Shelter) – small pocket of land in village centre unsuitable for residential development.
- Chobham Recreation Ground – owned by Chobham Recreation Ground Charitable Trust and in active use as the parish's only recreation ground.
- Cannon Corner, St Lawrence Churchyard and The Leat – small pockets of land in the Conservation Area maintained by the Parish Council, unsuitable for residential development.
- It is noted that the 154 Guildford Road site was assessed at Stage 3 as being potentially suitable, but not allocated due to being the subject of a current appeal. Online Planning Inspectorate records appear to show two linked appeals for this address as now having been withdrawn (APP/D3640/X/20/3255368 and APP/D3640/W/21/3276475).

Question 2 – Policy HA12/02: Swift Lane (Extension), Bagshot

- Do you have any comments on the proposed allocation of land at Swift Lane, Bagshot?

- Paragraph 4.4 refers to “Windlesham Ward”. This should be corrected to “Windlesham and Chobham Ward”.
- As already mentioned, the location of the site extension would contribute to an increased over-concentration of the borough's sites in the ward of Windlesham and Chobham.
- Chobham Parish Council has no further comments to make on this allocation due to it being outside the parish boundary.

Question 3 – Policy HA12/03: Land South of Broadford Lane, Chobham

- Do you have any comments on the proposed allocation of land south of Broadford Lane, Chobham?

General

- The proposed site allocation at Land South of Broadford Lane has significant constraints and sensitivities. The Council believes this is a highly unsuitable site for any form of residential development, and its realistic and cost-effective deliverability prospects are questioned.
- It is understood that while SCC is widely believed to own the land, SCC has reportedly said that SHBC may own the land. For full transparency, clarity on this matter is requested.
- It is noted that the Strategic Land Availability Assessment includes a separate site of partially previously developed land at Broadford (west of Castle Grove Road) as a realistic candidate for development for 15 homes during the plan period (site ID 548).

Should both sites come forward, the combination of the two sites and associated works would result in negative effects which would:

- permanently alter the low key approach to the High Street;
- harm the rural character of the south of the village outside the settlement area;
- cause a marked uplift in density of population in this area;
- exacerbate existing severe highway issues; and
- fail to enhance the setting of the Conservation Area.

Health and safety considerations

- The Parish Council fails to understand why the site's location directly adjacent to a sewage treatment works does not immediately rule it out of consideration for any form of residential development on health and safety grounds. The site would be an unpleasant place to live, with foul odours, pollution and highly probable vermin and insect issues.
- Health and safety issues associated with the adjacent sewage works and its sewage traffic would conflict with emerging policies E4(1)(a) and H11(2)(e). It would be a risk to both the site's residents and any animals kept on site. Furthermore, it is an unacceptable environment in which to raise children.
- As recognised in the consultation documentation, the site is understood to have been part of a landfill site in the past. A full soil assessment needs to be undertaken. The cost of remedial work to bring the land to a suitable standard could be substantial. Thorough health and safety investigations should be given the highest priority in assessing the site's suitability for allocation.
- It is unclear whether the local Gypsy and Traveller community has given its support in principle for this becoming an allocated future Gypsy and Traveller site, despite the obvious health and safety concerns and severe issues faced by residents on unsuitable contaminated and polluted sites elsewhere in the country. The allocation of this unhealthy site would appear not to amount to fair and equal treatment of the travelling community.
- The Parish Council urges that the detailed representations, photographic evidence and experiences from nearby residents and users of the bridleway are given great weight in this regard.

Green Belt

- The proposal to remove the site from the Green Belt goes against all five of the very purposes the Green Belt is intended to serve:
 - the release of the site for development would contribute to urban sprawl;
 - the site's development would contribute to the merging of neighbouring towns;
 - it would fail to assist in safeguarding the countryside from encroachment;
 - it would not preserve Chobham's historic setting and special character; and

- by not utilising brownfield land for the site, no contribution would be made to urban regeneration.
- The site's proposed removal from the Green Belt has not been fully justified. It has not been made clear why its Green Belt status could not be maintained even if it were to be put forward for development.
- The site and its surrounding land was included in the January 2022 Chobham Village Green Belt Study and was deemed to contribute significantly to the Green Belt, showing a high degree of openness. Its loss would likely be irrevocable, and it is this type of land that should be afforded the highest protection.

Public bridleway (Broadford Lane), highways and access

- The site has poor access for the proposed use. Broadford Lane is a public bridleway with a speed limit of 10mph and only wide enough for a single vehicle. The surface of the relevant part of the bridleway, while contributing to its rural and rustic character, is unsuitable for an uplift in large vehicles and increased traffic. The character and quietness of the lane is valued by its users and the local community.
- The bridleway has an unusually high number of warning and danger signs along its length, including risk of drowning and falling trees on adjacent land, risk of dogs scaring/harming farm animals, keep out of neighbouring land, multiple reiterations of the speed limit and caution signs of various types. It is gated and padlocked for motor vehicles beyond Broadford Farm. The implied risks and conflicts, some of which may have been in response to ongoing issues, do not appear to have been sufficiently acknowledged.
- The bridleway is well used by horse riders and pedestrians and provides the only relatively traffic-free rural link between Castle Grove Road, Station Road and Sandpit Hall Road. Its existing use and character would be at high risk of negative impacts, and would be contrary to emerging policy H11(2)(f). There is nothing in the development requirements that acknowledges the value of the bridleway and the importance of protecting and enhancing it for existing users, including cyclists who also have the right to use it (subject to giving way to other users).
- The negative impacts for existing bridleway users would include, but are not limited to, significantly increased conflict with motor traffic including large vehicles, loss of priority (regardless of bridleway hierarchy), visual impact (loss of adjacent greenfield site, urbanising of the lane: e.g. introduction of passing places and/or resurfacing) and noise, particularly if any industrial or other mixed use is proposed to be allowed on the site.
- The Draft Surrey Heath Local Plan contains an emerging policy aimed at not allowing equestrian development to "result in the over-use or deterioration of bridleways nor cause a hazard to other highway users" (GBC3(1)(f)). While the Parish Council has challenged this policy (preferring that bridleways are kept in good repair for their purpose), it fails to see how equestrian facilities should not be allowed to cause a

deterioration to bridleways, but other development may do so, as would be the case in Broadford Lane.

- The Parish Council has previously called for greater protection to be afforded to Chobham's footpath and bridleway network, and opportunities for enhancement to be maximised. The quality of Chobham's rights of way is gradually being eroded. Being able to take exercise in an attractive, safe natural environment is important for the health and wellbeing of the whole community, particularly for rural areas where there are limited other exercise opportunities that do not involve a car journey.
- The site has poor connectivity to the existing street pattern and only one access route for vehicles. Upon entering via the bridleway, there is no through route for motor traffic, and no turning point outside of the site boundary. The site being of a relatively backland nature approximately 400 metres from the main road would be a challenge for larger service vehicles including refuse collection, as well as for emergency services.
- Considering the narrowness of the bridleway, transporting mobile homes and caravans in and out of the site would be problematic, even if passing places were to be introduced.
- The access arrangements for the adjacent field to the south are unclear. It appears as though the field may currently be accessed via a track through the proposed allocated site.
- Castle Grove Road leading to Chobham High Street is a notorious pinch point which suffers from congestion, delays and often gridlock for road users on a daily basis. The introduction of more traffic onto this road and the inevitable junction intensification would adversely affect traffic flow and exacerbate an already severe situation. Congestion at any one of Chobham village's main junctions also tends to have a knock-on effect to the other junctions due to the compactness of the village centre.

Heritage assets

- The development requirements in HA12/03 fail to acknowledge address the potential severe impact on the Grade II listed building Pond House and its setting.
- The Broadford Lane and Castle Grove road junction, as well as the entire hard surfaced section of bridleway itself, would almost certainly require upgrading to the detriment of its historic character. These works would likely have a significant negative effect on Pond House and its setting.
- Pond House abuts the bridleway access and has several ground floor windows on its side (north) elevation directly adjacent to the bridleway. The bridleway is an intrinsic part of its setting. The north side of the building is particularly vulnerable to any intensification of use of the bridleway for traffic, including risks of damage from wide loads such as the transportation of mobile homes.

Public transport

- The nearest bus stop (on Station Road but labelled Sandpit Hall Road) is approximately 550 metres from the site and accessed via the unmade section of bridleway only on foot or horseback. It is unlikely to be suitable for those with mobility issues or people with children in pushchairs etc. The very small tarmac refuge area at the bus stop on the south side of Station Road is in poor condition with overgrowth, and there is no footway from the bus stop to the bridleway entrance without crossing Station Road twice in short succession.
- There is an alternative bus stop at Chobham Village Hall, however this is a longer (albeit probably safer) walking distance away at approximately 900 metres. When considering the public transport routes, it is urged that the access to the site from both bus stops is assessed, given the likelihood of the Sandpit Hall Road bus stop being seen as a quicker route and shortcut avoiding the village centre.

Character of area and biodiversity

- The site is greenfield land, with no previous development. No information is given on how biodiversity and environmental net gain is likely to be achieved when the starting point of loss would be significant.
- As noted in the Sustainability Appraisal, the site includes mature trees, and there is adjacent priority woodland habitat. This sensitivity both alone and in combination with other issues (Green Belt) make the site a poor choice for the proposed use.
- Wildlife habitats and movement patterns for wildlife would be destroyed or eroded, and there would be a loss of dark landscape.

Flood risk

- It is believed the flood risk of the site is underestimated. The flood map for planning shows flood zones 2 and 3 adjacent to the site and the risk is likely to increase during the plan period and beyond. Flooding connected with the River Bourne is known to be unpredictable. As previously raised by the Parish Council on many occasions, desk-based flood reports and assessments do not generally reflect the real position “on the ground”. The actual lived experience and evidence of nearby residents where flooding is concerned must be given greater weight than desk studies.

Residential amenity and community cohesion

- The site would be of a higher density than nearby residential sites and have the potential to dominate the nearest settled community (residents of Broadford Lane and the small number of houses to the east of Castle Grove Road close to Broadford Lane).
- The proposed residential development of the site itself and the intensification of use of Broadford Lane is likely to have a severe impact on the residential amenity of the closest neighbouring properties.

- It has not been made clear whether the site is proposed to be allocated for residential use only, or for mixed use that may include business, industrial or quasi-industrial activities as is the case on some Gypsy and Traveller sites. This is a critical consideration for nearby residents and users of the bridleway.

Question 4 – Policy HA12/04: Bonds Drive Extension, Pennypot Lane, Chobham
- Do you have any comments on the proposed allocation of land at Bonds Drive, Pennypot Lane, Chobham?

General

- The proposed Bonds Drive extension site allocation has significant constraints and sensitivities. The Council believes this is a highly unsuitable site for any form of residential development, and its realistic and cost-effective deliverability prospects are questioned.
- The Sustainability Appraisal (SA) (Non-technical summary) states the Bonds Drive site “would involve a (max) five plot expansion”. This appears to conflict with elsewhere in both SA reports which use the tilde symbol (~) to state approximately or circa 9 plots (which could mean more than 9), while for the most part the rest of the documentation refers to 5-9 plots, or “up to 9” plots. The figures should be presented in a consistent way for clarity as to the range of plots being proposed.
- Assuming the higher end of the range, circa 9 plots, this would appear to be a large number of plots compared to the neighbouring site of 6 plots, particularly when additional flooding and other constraints are considered. This raises a question of whether there would be overcrowding issues.
- It is understood that the plot needs have arisen from the existing 6-plot Bonds Drive site. Again assuming a 9-plot extension, a 150% increase in plots appears far higher than expected average household growth and should be a matter of concern if the trend were to continue. Is it possible the figure also includes needs from elsewhere?
- It is noted that the availability of the land is in question, and compulsory purchase is being considered. Concerns are raised about the potential cost, both alone and in combination with the significant work that would be required in respect of the site being in an area of high flood risk (flood zones 2 and 3).

Green Belt

- The proposal to remove the site from the Green Belt again goes against all five of the very purposes the Green Belt is intended to serve:
 - the release of the site for development would contribute to urban sprawl;
 - the site’s development would contribute to the merging of neighbouring towns;
 - it would fail to assist in safeguarding the countryside from encroachment;
 - it would not preserve Chobham’s historic setting and special character; and

- by not utilising brownfield land for the site, no contribution would be made to urban regeneration.
- The site's proposed removal from the Green Belt has not been fully justified. It has not been made clear why its Green Belt status could not be maintained even if it were to be put forward for development, as is the case on the existing Bonds Drive site.
- It is somewhat unclear whether it is only the extension that is proposed to be removed from the Green Belt, or the combined site. Either way, this presents a conflict, particularly in light of renewed commitments at government level to protect the Green Belt since the existing site was established.
- With compulsory purchase being considered, it would appear more appropriate to use compulsory purchase powers for a more suitable site outside of the Green Belt and not in flood zones 2 and 3. It is recognised that there are strict controls in the compulsory purchase process which may limit the options, including a need to demonstrate no suitable alternatives. This does not change the Parish Council's position that the proposed site is equally or more unsuitable than some of the other options in the "unavailable" category.

Highways and access

- There are warning signs at both ends of Pennypot Lane that the lane is unsuitable for heavy goods vehicles (though it is noted with surprise that 5 Bonds Drive was granted permission for use as a goods vehicle operating centre in 2021). This presents an incompatibility with both bringing mobile homes onto the site, and the anticipated usage which would likely include routinely transporting heavy loads on and off the site.
- Lovelands Lane has a well documented history of cars becoming stranded in the ford. The danger of this lane to motor vehicle users must be risk-assessed as part of any proposal to increase residential development in the immediate area.
- There are no pedestrian footways in the vicinity of the site, and the proposal conflicts with emerging policy H11(2)(a).

Sustainability and public transport

- National planning policy is clear that Gypsy, Traveller and Travelling Showpeople site planning must contribute to the achievement of sustainable development. The proposed use of the site fails to accord with all national and local sustainability policies directing new development to the most sustainable areas making the best use of infrastructure and services.
- The proposed use is contrary to the principles of sustainability due to its relatively isolated residential location, remote from public transport, day to day services, schools, healthcare, etc. It does not meet the criteria set out in emerging policy H11(2)(d).

Flood risk

- With regard to flood risk, national planning policy is clear: "do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans".

- The area has been subject to documented severe flooding incidents and the risk of flooding is likely to worsen during the plan period and beyond.
- Reported flooding events should not be relied upon as being the only incidences of flooding in this area. Flooding in and around flood plain areas is rarely reported or documented due to its frequency and because flooding in the flood plan is wholly expected as part of the nature of the land.
- The site's location in flood zones 2 and 3 would mean significant ground work is required (with associated significant cost) to attempt to make it viable for the proposed use. Ground level work is mentioned in the Site Identification Paper Addendum. The Council has strong concerns regarding the raising of ground levels in areas prone to flooding due to the strong likelihood of it increasing flooding elsewhere. It again urges that no raising of land levels is allowed in flood-prone areas.

Character of area and biodiversity

- The site is greenfield land and part of an important river corridor. No information is given on how biodiversity and environmental net gain is likely to be achieved when the starting point of loss would be significant.
- The proposed development of the allocated site, both alone and in conjunction with the existing site, would fail to enhance the quality of the rural environment.
- The proposed use of the site would give rise to obvious environmental harm on a Site of Nature Conservation Importance, a designation applied to ensure protection and enhancement in the planning system in consideration of its importance to wildlife.
- Wildlife habitats and movement patterns for wildlife would be destroyed or eroded, and there would be a further loss of dark landscape.
- The allocation of this site would be contrary to emerging policy IN5 (Green Infrastructure) due to compromising the integrity of the green infrastructure network (which specifically includes waterways and areas that are not accessible).
- No mention has been found in the documentation of the registered Common land adjacent to the site on its north-western boundary. This land may be vulnerable and appropriate consideration should be given to its protection.

Residential amenity and community cohesion

- Taking into account site density, the resulting combined Travelling Showpeople site would have the potential to dominate and outnumber the nearest settled community (which is in essence a single row of homes to the immediate north).
- Over a period of several years, the Council has received reports of possible planning breaches on the existing Bonds Drive site, including issues relating to industrial and/or business uses (other than the lawful storage and maintenance of showpeople equipment), physical development on the site and the number of mobile homes and caravans allowed. These have been relayed to SHBC Corporate Enforcement and investigations remain ongoing, but it has been difficult to obtain clarity to the situation. It is frustrating to some members of the public to be consulted on a proposal to

increase the number of plots by up to 150% while there are unanswered planning-related enquiries about the existing site.

- It is noted that the development requirements contain no similar references to promoting community safety and social cohesion as those included in the requirements for Land South of Broadford Lane. With both the resulting sites proposed to be of broadly the same capacity, it is felt that this general requirement should be included for both sites.

Question 5 – Interim Sustainability Appraisal Addendum

- Do you have any comments on the Interim Sustainability Appraisal Addendum?

- The Interim Sustainability Appraisal Addendum has been reviewed, and relevant comments are incorporated within the responses to the above questions.

In response to requests from residents, Chobham Parish Council is submitting its response several days before the deadline and making it publicly available. The Council has made its best efforts to review all the consultation material and relevant other documentation in the limited time available. Should any significant further information come to light following the submission of this response and prior to the deadline, the Council may make additional comments.

Thank you for the opportunity to comment on the consultation documentation and for taking this letter of representation into consideration. If the Parish Council can provide clarification or further information on any of the points raised above please do not hesitate to contact me.

Yours faithfully



Ms C Cooper
Planning Administrator