

# **Chobham Neighbourhood Plan 2024 to 2038**



## **Consultation Statement to accompany the Submission Version Chobham Neighbourhood Plan June 2025**

**Prepared by the Chobham Neighbourhood Plan Steering Group  
on behalf of Chobham Parish Council**

## Contents

1	Introduction .....	3
2	Summary of engagement and consultation activities, issues and outcomes .....	4
	Stage I: Preparing the Pre-Submission Version Neighbourhood Plan .....	5
	Stage II: Consulting on the Pre-Submission Version Neighbourhood Plan .....	9
	Stage III: Finalising the Submission Neighbourhood Plan .....	14
3	Conclusion.....	15
	Appendix A: List of those consulted at Regulation 14 (Pre-Submission stage) .....	16
	Appendix B: Summary of comments received at Pre-Submission Regulation 14 consultation and response from the Steering .....	18

## **1 INTRODUCTION**

- 1.1. The policies contained in the Chobham Neighbourhood Plan (CNP) have been developed following extensive interaction and consultation with the local community.
- 1.2. This Consultation Statement sets out how the CNP has been developed and contains, in accordance with Regulation 14 of Neighbourhood Development Planning (General) Regulations 2012 (as amended):
  - details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - details as to how they were consulted;
  - a summary of the main issues and concerns raised by the persons consulted; and
  - how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

### **The Chobham Neighbourhood Plan Steering Group**

- 1.3. Chobham Parish Council is the qualifying body officially responsible for preparing the Neighbourhood Plan. A Steering Group, comprising local councillors and volunteers from the community, was set up to lead on the development of the CNP with each member take the lead on a particular topic.

## 2 SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

2.1. A high-level summary of the engagement and consultation activity is shown in *Table 1*:

*Table 1: High level summary of the key milestones*

Date	Milestone	Key activities
2012 to 2013	Chobham Parish Council decides to prepare a Neighbourhood Plan	<ul style="list-style-type: none"> <li>• Neighbourhood Area is designated</li> <li>• Steering Group established</li> <li>• Consultation events</li> </ul>
2014 to 2021	Evidence and engagement	<ul style="list-style-type: none"> <li>• Local business engagement</li> <li>• Parish wide survey</li> <li>• Website to promote the Plan</li> <li>• Evidence gathering</li> <li>• Local Green Space engagement</li> </ul>
2022	Policy options open day	<ul style="list-style-type: none"> <li>• Emerging policy options tested and refined.</li> </ul>
2023 to 2025	Pre-Submission Version (Regulation 14) Plan published  Publish Regulation 16 Plan  Examination (tbc)  Referendum (tbc)	<ul style="list-style-type: none"> <li>• SEA/HRA Screening prepared</li> <li>• Pre-Submission (Regulation 14) consultation</li> <li>• Plan amended appropriately into Submission Version and submitted, with supporting documents to SHBC</li> <li>• Regulation 16 consultation run by SHBC</li> <li>• Plan independently examined and finalised for Referendum</li> <li>• Plan 'made' and forming part of the strategic development plan</li> </ul>

2.2. The sections below describe, in fuller detail, the engagement and consultation process which took place during the Plan preparation. This is divided into three stages:

Stage I: Preparing the Pre-Submission Version Neighbourhood Plan

Stage II: Consulting on the Pre-Submission Version Neighbourhood Plan

Stage III: Finalising the Submission Neighbourhood Plan

## Stage I: Preparing the Pre-Submission Version Neighbourhood Plan

2.3. There have been two attempts to develop a neighbourhood plan for Chobham, starting back in 2014, when the first Steering Group was set in up in June of that year. An application was submitted to Surrey Heath borough Council (SHBC), who [designated the Chobham neighbourhood area](#) on 12 November 2013.

### 2014 to 2021:

- 2.4. **The First Attempt:** The project was effectively launched at the Chobham Carnival on 14 September 2013, with the Steering Group hosting a gazebo with general information about neighbourhood planning. A banner, 'Chobham – the future' was printed to promote the stall.
- 2.5. Some preliminary work was undertaken by the Steering Group to explore the sorts of issues that the neighbourhood plan could cover. Members reviewed other neighbourhood plans to get a sense of the content. For instance, nearby Sunninghill, Sunningdale and Ascot were preparing a plan as were Tattenhall and Thame. It was considered that there should be an overarching vision and objectives and a discrete set of policies with supporting evidence to justify them.
- 2.6. An initial discussion of key issues led to the following being identified by the Steering Group:
- Housing to meet local needs, scale and design.
  - Sustainable high street.
  - Traffic managed on the high street.
  - Compact village, focus on the centre.
  - Maintain the greenbelt, spaces and character.
  - Walkability.
  - Create / join community into one settlement.
  - Village identity.
  - Encourage and maintain vibrancy: regeneration, renewal and families.
  - Community cohesion – local groups.
  - Airport, employment, smaller business units.
  - Preserve the common, wildlife and natural aspects.
  - Consider the flood risk.
- 2.7. At this point, a draft Vision and outline Objectives was prepared as follows:
- 2.8. **Vision:** Chobham will be vibrant sustainable community with appropriate development reflecting our local distinctiveness settled in Greenbelt and a conservation area.
- 2.9. **Outline Objectives:**
1. **Housing:** housing development will meet local needs with appropriate size, scale and design.

2. **Environment:** preserve and enhance the special characteristics of the Greenbelt, conservation area and open spaces.
  3. **Business / employment:** support and encourage commercial development to meet local needs.
  4. **Transport and infrastructure:** a safe village accessible with easy access by foot or cycle.
  5. **Leisure:** preserve and enhance leisure facilities in one central facility.
- 2.10. Over the next few years, work continued on the neighbourhood plan. There were various community meetings and engagement events, including:
- Business breakfast meeting
  - Regular parish magazine articles
  - Dedicated website
  - Regular meetings with SHBC
  - Public Exhibition in 2018 at the Village Hall
  - Meetings with local groups – some of whom were represented at the Steering Group meetings
- 2.11. The work culminated in a document produced in 2021. That document contained 14 policies and was submitted for comment to SHBC. The comments received from SHBC demonstrated that much work was still outstanding, including additional evidence gathering and justifications.
- CH1 New Developments
  - CH2 New Large Developments
  - CH3 Rural Exception Housing
  - CH4 Community Facilities
  - CH5 Employment
  - CH6 Design Standards
  - CH7 Heritage Assets
  - CH8 Features and Compatibility
  - CH9 Conservation Area
  - CH10 Infill
  - CH11 Local Green Spaces
  - CH12 Sustainable Urban Drainage
  - CH13 Biodiversity
  - CH14 Dark Skies
- 2.12. At this point, the original Steering Group disbanded, and in November 2021, the project was handed over to a new Steering Group.
- 2.13. Much of the documentation relating to the first attempt appears to have been lost. Details that do exist, largely meeting minutes, can be found on the [Parish Council website](#). The draft document itself was available to view and was the starting point for the next attempt.

## 2022 onwards

- 2.14. **The Second attempt:** The new Steering Group, comprising both councillors and residents decided to reinvigorate the project. It was agreed that a planning consultant would be contracted to review the existing plan and advise on how best to proceed. The Review identified some serious flaws in the document to date and it was agreed that a new work programme would be established. Nevertheless, the work undertaken to date had been based on feedback from the community and many of the issues in the inherited neighbourhood plan were felt to be still relevant.
- 2.15. Key activities that took place over the course of the plan development of the plan were:
- Community Survey:** An initial step to support the refreshed work was the development of a community survey to retest views on the issues raised so far and identify any new emerging ones (*Figure 1*).

*Figure 1: Community Survey, 2023*

### Chobham Neighbourhood Plan Community Survey

An exciting opportunity: Chobham Parish Council is developing a Neighbourhood Plan – covering the village and wider parish. The Neighbourhood Plan will contain planning policies which, once agreed by the community, will sit alongside the Surrey Heath District Council Local Plan policies and will help to guide planning applications and how land is used in our area over the next 15 to 20 years

This Neighbourhood Plan Community Survey is an important opportunity for you to tell us what you think about our heritage, open spaces and priorities for the future, and to express your views on a number of other matters related to our community. We have an opportunity to protect valued areas of green space, improve local biodiversity, encourage walking and cycling, support local businesses and the village centre, and mitigate climate change. We will also be seeking to influence what sort of housing is delivered locally, so that it is meeting the needs of our community.

- 2.16. The survey findings consolidated the original vision, as set out in the previous version of the plan, and this was retained as it had been tested with the community:

**To achieve sustainable development within Chobham, which respects the rural nature of the Parish, its architectural heritage and environmental assets and which offers housing and community facilities for generations to come.**

- 2.17. On the back of the survey, the Steering Group established a series of topics to explore in more detail. These were:
- Housing
  - Character, Heritage and Design

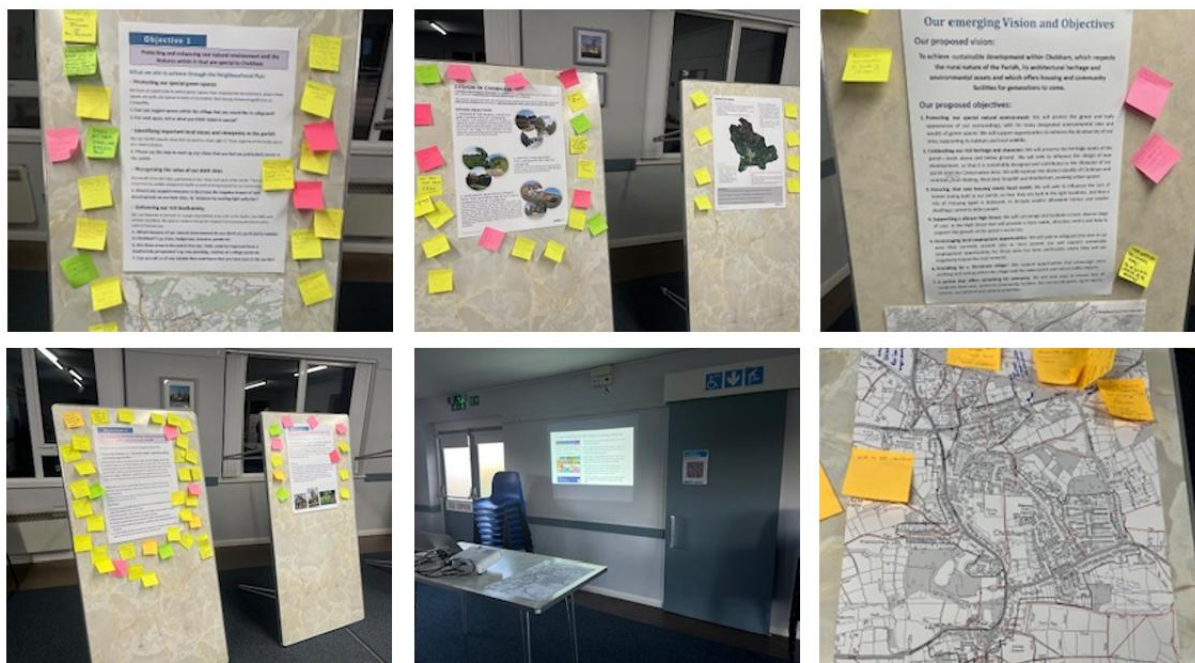


- The village centre and wider economy
- Environment and green space
- Transport and movement
- Community facilities

2.18. The planning consultant, taking account of the previous plan, the survey findings and information stemming from the emerging Local Plan, developed a 'skeleton draft' document. This included many of the themes explored in the original draft, with new ones added. It set out where additional evidence would be required to underpin potential policy.

2.19. **Community event:** In December 2022, following on from the community survey and consolidation of the findings, a community event was held in the Parish Pavilion. This was an opportunity to refresh the purpose of neighbourhood planning with the community, to share feedback from the survey, to share the vision and emerging objectives and policy options, and to gather additional first-hand feedback and evidence. The event included an area for attendees to watch a slideshow on neighbourhood planning. There were also large poster displays setting out, by topic, the main objective areas alongside specific questions. There were post-it notes available for people to share their views as well as large maps which could be marked up with feedback.

Figure 2: Images from the December 2022 community event



2.20. The event was well attended, including by SHBC Officers, and provided helpful input for the Steering Group to evidence some of the emerging policies.

2.21. **Design guidance** - An important aspect of the work to date was the desire to influence the design of development so that it was in-keeping with local character, of high quality and sustainable. An earlier attempt to produce a design guide had not materialised, and the group successfully applied to Locality to access technical support to prepare bespoke design



guidance for the parish. The document was prepared in consultation with the community – including attendance from the consultants at the December 2022 event and was finally published in Summer 2023.

- 2.22. **Housing** – There was great concern locally about the erosion of the green belt, with the emerging Local Plan seeking to amend the boundaries. It was noted, however, that this was not something the neighbourhood plan could address as it was a strategic matter. This led to the ambition to include a policy setting out key principles for development, such as restricting coalescence and strongly protecting the remaining greenbelt.
- 2.23. In light of the emerging Local Plan, the group decided early on not to allocate sites for development. Not only were sites coming forward via the Local Plan, but also there were few spaces in the settlement itself, and not within green belt, left to develop. Instead, the group prepared a Housing Needs Assessment, which, in combination with anecdotal feedback from the community, was used to support a policy relating to housing mix.
- 2.24. **Heritage assets** – The group understood that an opportunity to identify non-designated heritage assets. Residents were asked which assets they considered to be of importance and a longlist was created. In addition, local group A project in parallel with the neighbourhood plan was being undertaken with SHBC. It was agreed that the list compiled for that work would be referenced in the neighbourhood plan because all of the heritage assets identified were in fact on that list.
- 2.25. **Green Spaces** – Much work was undertaken to explore the designation of local green space. The community survey and community event had enabled a long list of potential spaces to be developed. This was embellished with an audit undertaken by the Steering Group themselves. The long-list were visited and considered against the national criteria and 15 spaces were considered to be suitable for inclusion.
- 2.26. Discussions were held with local groups to share information about the neighbourhood plan and to gather further feedback on the emerging policies. This included Officers at SHBC.
- 2.27. By Spring 2023, an initial draft neighbourhood plan was in place. This was submitted to SHBC for informal comment. It was also used as the basis for the SHBC screening to determine whether or not it was likely to have significant environmental impacts. The [Screening Determination Report](#) was published in September 2023, which stated that it was unlikely to have such impacts.
- 2.28. Following on from the informal comments received by SHBC and the receipt of the screening document, the neighbourhood was further refined into its Pre-Submission Version.

## Stage II: Consulting on the Pre-Submission Version Neighbourhood Plan

- 2.29. The Pre-Submission (Regulation 14) consultation took place between 6 May and 21 June 2024. It was publicised in the following ways:

- The Parish Council website was updated showing the Plan itself, the Housing Needs Assessment, the Design Guidance, the SEA/HRA Screening Determination Statements and links to other evidence.
- Hard copies of plan were made available in locations around the parish. Residents were able to loan these to read at home. Paper surveys were made available to fill in and boxes were placed around the parish for people to return them to.
- Consultation events were held in the Parish Pavilion with posters displaying the policies and members of the Steering Group available to answer questions.

*Figure 3: Photos from the consultation events*



- Posters and banners were placed around village
- Options made available to respond to consultation (online survey, email or letter).
- Social media updates were posted on Facebook.
- Statutory consultees were written to directly as were the owners of the proposed Local Green Spaces.

2.30. A list of the consultees contacted is contained in Appendix A and responses were received from the following:

- Surrey Heath Borough Council
- Historic England
- Natural England
- Chobham Poor Allotment Charity
- Cllr Diane Beach
- Caroline Cooper
- James Osbourn
- Vistry Fairoaks
- ADP Fairoaks Ltd
- Surrey County Council
- Carol Gregarious

- Laister Planning Ltd
- SurveyMonkey (residents) – 15
- Cllr Les Coombes
- Letter from Pet Cemetery Trust

- 2.31. 15 responses were received from residents, which were input into the online survey.
- 2.32. Representations received at the Pre-Submission Consultation were recorded by topic/policy and carefully considered by Steering Group members. A summary of the comments and responses from the Steering Group, are set out in Appendix B. Full copies of the responses are available on the Parish Council website. The following paragraphs provide a summary, by topic area, of the comments received during this process and how these were integrated into the Submission Version CNP.
- 2.33. **General comments:** Overall, the comments were very supportive of the Plan and its scope. A number of factual corrections were submitted, which have been addressed in the Submission Version Plan. This was largely in relation to Section 2 (About the Parish).
- 2.34. The conformity referencing has been updated to accord with the most recent National Planning Policy update (December 2024). This has also led to some policy minor amendments, for instance the references to First Homes.
- 2.35. The CNP has been reviewed to ensure that it meets accessibility requirements. The only exception is the Design Guidance aspect, which has been included in the body of the neighbourhood plan but which was produced externally by AECOM.
- 2.36. The new Local Plan continues to progress in parallel with the CNP and paragraphs have been updated to provide the latest situation on this and with reference to the most recently published Local Development Scheme.
- 2.37. **Spatial strategy and housing:** Policy CH1 (Location of Development) was amended slightly to remove references to specific paragraphs in the NPPF and to reflect the Regulation 19 version of the Local Plan, notably in relation to allocations. Reference to the updated national policy relating to green belt and grey belt has been included.
- 2.38. Policy CH2 (Meeting Local Housing Needs) is underpinned by the Chobham Housing Needs Assessment. The supporting text has been amended to make reference to rural housing sites that may provide an additional mechanism to bring forward local housing. It has also been updated to reflect the [Surrey Heath Housing Needs Assessment](#) (SHHNA) published in 2024. The indicative tenure percentages by bedroom number have been removed from the policy, but retained in the supporting text. This will allow for flexibility when applying the policy. Reference to First Homes has been retained, as this remains a valid housing product, but the requirement to deliver the first 25% of affordable homes as First Homes has been removed to reflect the amendments to the NPPF in December 2024. The desire to support uplifts to affordability has been retained in the policy.
- 2.39. **Character, heritage and design:** Policy CH3 (Character of development) was very much supported and remains largely as drafted, although the clauses have been separated to make it clearer to the reader. Repetition of other policies in the CNP has been removed, for

instance reference to Policies CH6, CH9 and CH11. The policy is underpinned by the Chobham Design Guidance and Codes, which forms an integral part of the neighbourhood plan.

- 2.40. Policy CH4 (Energy Efficiency and Design) received support from all parties. It has been amended slightly to include additional detail relating to the need to minimise heat loss in new developments. It has also been amended to refer to viability.
- 2.41. Policy CH5 (Minimising the risk of flooding) received support from Surrey County Council, as the Flood Authority, with some minor amendments made on their advice, for clarity purposes. SHBC recommended rewording of Clause 2, to make it positively worded, however the Steering Group consider the need to retain this clause as written given the severity of flooding in the area.
- 2.42. Policy CH6 (Conserving heritage assets) remains largely as drafted and received strong support from those commenting. The reference to heritage at risk has been moved to the supporting text. SHBC has commented on the scope of the need for a Desk-based assessment in relation to archaeological deposits, stating that the emerging local plan requires this only in areas of high archaeological potential or on sites of 0.4ha or greater. As the new Local Plan has not yet been adopted, the Steering Group are minded to retain this clause, which has been supported by SCC.
- 2.43. **The Village centre and wider Economy in Chobham:** Policy CH7 (Chobham Village Centre) received little direct comment. The policy has been amended to refer to a supporting Figure and also clarify the names of the areas referred to (to include Chertsey Neighbourhood Parade). A new Appendix has been added setting out how viability might be assessed, as per the comments from SHBC. SHBC also recommended removing Clause 4 suggesting that heritage is adequately covered in Policy CH6. However, this is a very specific clause relating to heritage buildings in the village centre and their reuse, hence it has been retained.
- 2.44. Policy CH8 (Supporting local employment opportunities) was considered to be an important policy in the CNP. Whilst this topic is covered to an extent in emerging Local Plan policy (indeed this was a comment received by SHBC at the informal commentary stage), the policy is considered to add additional local detail in the absence of a fully adopted Local Plan. Two sites in the parish (Fairoaks Airport and Chobham Business Centre; and Longcross Studios) are identified as Strategic Employment Sites in the emerging strategic policy. The CNP, in addition, seeks to identify Highams Park as a Locally Important Employment Site, to protect against loss of employment. It is supported by SHBC.
- 2.45. **Environment and Green Space:** Policy CH10 (Green and blue infrastructure and delivering biodiversity net gain) was supported by those responding. The supporting text has been amended very slightly on the advice of Surrey County Council in relation to land in their ownership. SHBC recommended a change to clause 5a in relation to trees, but the Steering Group felt that this diminished the overall importance of retaining trees. Reference to ancient woodland has been removed as this is an irreplaceable habitat.
- 2.46. Policy CH11 (Local Green Space) received a number of comments.

- 2.47. The owners of Broom Lane Allotments objected to the inclusion of the site as a local green space, stating that it is private land and has a constitutional defined purpose which does not reconcile with inclusion in the NDP. The Steering Group discussed this but consider that it does meet the requirements of the NPPF and in addition has been cited as 'green space' in the emerging Local Plan. The site has been retained in the Submission Version.
- 2.48. SCC commented on the inclusion of the Playing Field attached to Wishmore Academy, stating that it is adequately protected already. The Steering Group discussed this in depth. It was considered that this space is important for the community and it has been retained into the Submission Version.
- 2.49. The final space to receive comments was the Field near the Fire Station. On review of the evidence gathered, the Steering Group were minded to remove the space from the Submission Version plan as its community value cannot be robustly argued.
- 2.50. SHBC suggested that spaces already within Green Belt should be reconsidered for their inclusion as local green space. Planning guidance allows for spaces in the Green Belt to be designated, where there is a justification to do so. In Chobham, the community were keen to include all of the spaces identified, including those in the Green Belt. The new Local Plan seeks to amend Green Belt boundaries and further amendments may be made in the future. Additionally, national policy has been amended in relation to uses appropriate in the Green Belt and the designation of these local green spaces will ensure that they are retained and not under threat.
- 2.51. Policy CH12 identifies significant local views. These were assembled as a result of the local engagement. Vistry Fairoaks and ADP Fairoaks Ltd. queried the inclusion of View 8. The Steering Group revisited the viewpoint and ascertained that the view should be retained. Additional photography added to demonstrate its importance locally. The view is valued by local people, which has been demonstrated through the neighbourhood plan engagement process.
- 2.52. Policy CH13 received support and no substantive comments beyond rearranging the wording to make the policy clearer.
- 2.53. **Transport and Movement:** Policy CH14 (Improving walking, cycling and equestrian opportunities) was largely supported. SCC provided additional supporting text, which has been added. Likewise, SCC provided helpful comments on Policy CH15 (New residential development parking space standards and design), which has been added to strengthen the policy.
- 2.54. **Community facilities:** The comments received relating to this policy largely fell outside the scope of the CNP. SHBC recommended that further information should be provided in terms of how to demonstrate viability. This has been included in an appendix.

### **Stage III: Finalising the Submission Neighbourhood Plan**

- 2.55. Following the changes made to the CNP as a result of the Regulation 14 consultation, the Submission Version was formally submitted to SHBC who, once satisfied that the correct set of documents have been received, will undertake the Regulation 16 consultation. The document will then proceed to Examination and, assuming a favourable outcome, to referendum.

### **3 CONCLUSION**

- 3.1. The Steering Group has undertaken a very thorough engagement programme in order to develop the Chobham Neighbourhood Plan. It has set out a comprehensive vision and objectives and guiding principles. In developing the policies to achieve the vision and objectives, the Group has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 3.2. Feedback from the Regulation 14 consultation has enabled the Plan to be shaped into its final version, to submit to SHBC.
- 3.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Development Planning (General) Regulations 2012 (as amended).
- 3.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Steering Group or as someone who has taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Chobham Neighbourhood Plan.



## **APPENDIX A: LIST OF THOSE CONSULTED AT REGULATION 14 (PRE-SUBMISSION STAGE)**

In addition to residents, the following organisations were contacted:

- Surrey Heath Borough Council
- Surrey County Council (Minerals and Waste Planning)
- Surrey County Council (Planning)
- Surrey (Rights of Way)
- Surrey Flooding and Drainage
- Surrey (Historic Environment))
- The Coal Authority
- Homes England
- Natural England
- Environment Agency
- Historic England
- Network Rail
- National Highways
- Marine Management Organisation
- Thames Water
- Affinity Water
- Gas (Cadent Gas)
- Electric (UK Power Networks)
- National Grid
- BT
- Surrey and Sussex NHS Trust
- Adjoining Parish councils:
- Windlesham Parish Council
- Sunningdale Parish Council
- West End Parish Council
- Bisley Parish Council

**Local Green Space owners:**

**The owners of the non-publicly owned proposed non-designated assets were also contacted to seek agreement on inclusion of their asset in the Plan.**

- Wishmore Cross Academy, Alpha Rd, SCC own the freehold, but the entirety is held by the Academy Trust under a 125-year lease
- Chobham meadows, SHBC
- Chobham cemetery, Chobham Parish Council
- Chobham cricket ground, Chobham Cricket Club
- Broom Lane allotments, Chobham Poor Allotments
- Red Lion allotments, Chobham Poor Allotments
- Benham's Corner, Chobham Parish Council
- Playing field, west of the High Street, SCC
- Chobham pet cemetery, Pet Cemetery Trust
- Little Heath green areas, Surrey County Council
- Chobham Recreation Ground, Chobham Recreation Ground Trust
- Victorian cemetery Chobham Parish Council / Parochial Church
- Field near Staton Road, Private
- Former Tree nursery at Mincing Lane, Private

## **APPENDIX B: SUMMARY OF COMMENTS RECEIVED AT PRE-SUBMISSION REGULATION 14 CONSULTATION AND RESPONSE FROM THE STEERING**

**Feedback received on the Chobham Neighbourhood Plan at Regulation 14 consultation  
Responses received from:**

1. Surrey Heath Borough Council
2. Historic England
3. Natural England
4. Chobham Poor Allotment Charity
5. Cllr Diane Beach
6. Caroline Cooper
7. James Osbourn
8. Vistry Fairoaks
9. ADP Fairoaks Ltd
10. Surrey County Council
11. Carol Gregarious
12. Laister Planning Ltd
13. SurveyMonkey (residents) – 15
14. Cllr Les Coombes
15. Letter from Pet Cemetery Trust

In addition: Automated replies but no comments from Environment Agency, Homes England, Guildford Council, London Assembly

A summary of the comments received (except those from SHBC) is provided in *Table 2*, where the reference number (column 1) relates to the numbering above. Full copies of the responses have been submitted to SHBC.

The SHBC comments were received as a pdf. These have been included after *Table 2*. Where changes have been made as a result of these comments, this has been explained in paragraphs 2.33 to 2.54 of this consultation statement.

Table 2: Summary of comments received at Regulation 14

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
1.	1	General	No specific comments.	Noted.
2.	2	General	No specific comments.	Noted.
3.	4	General	<ul style="list-style-type: none"> <li>• P.48 Photo of the bridge over the Bourne in Philpot Lane. This is known locally as Emmetts Mill Bridge.</li> <li>• P.51 6.8 Farmers Market. Chobham has a weekly market, the Chobham Country Market (formerly the W.I. Market) has been running for nearly 50 years.</li> <li>• P.60 Chobham Place Woods is part of Chobham Common, being Exchange Land for the Tank Factory most recently known as D.E.R.A. It was given SANG designation despite it already being public access land under Sec. 193 of LOP 1925.</li> <li>• P.80 8.10 D The Cycle Path between Chobham and Woking should also serve equestrians, the route runs mostly over Sec.L93 land namely Milford Green and Coxhill Green.</li> <li>• P.138 8 View over Fair Oaks. Two Public Rights of Way mark the boundary of the Licensed Airfield, Bonseys Lane Footpath No.1. to the East and Youngstroat Lane Bridleway No.3 to the West. If the land was "criss-crossed" with paths, aviation activity would be difficult if not impossible!</li> </ul>	Amend
4.	5	General	Suggest captioning all photos with location and date (if possible), noting if the photo is an example from outside Chobham. Cannot see any mention of Brick Hill in the plan, it could be worth noting its particular character somewhere?	Noted. We do not have the dates for the photos. Locations are provided where known.

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
5.	5	Fact check	<ul style="list-style-type: none"> <li>• 2.3 “The Green Belt is due to be amended in the emerging Local Plan, to exclude the village.” – is this being treated as a “done deal” or still a proposal?</li> <li>• 2.4 Not sure if it is intentional not to include all designations, but Chobham Common is also an SSSI.</li> <li>• 2.9 “A train station is situated adjacent to the Chobham local area, at Longcross in Runnymede. This station is located some 5km to the north of Chobham Village and has very limited train services to London.” – although trains have been very limited in the past, they are now half-hourly. The main issues with Longcross are its significant access, parking and facility limitations. The station has no direct road access. Public access is on foot only via an unmade and unlit woodland footpath off Burma Road, or from a path off the public highway at Churchill Drive, Longcross. The station is unstaffed, has no public car parking nearby, no cycle storage, no step-free access and no toilets. There is no bus service from Chobham to Longcross.</li> <li>• 2.13 Mentions two rural exceptions developments that were turned down on appeal. Mincing Lane Nursery was one, what was the second one? If this refers to Castle Grove Nursery, this wasn’t a proposed rural exception site.</li> <li>• 4.1 Also Ottershaw in the east?</li> <li>• 5.6 Is it worth mentioning that the new (draft) Local List includes quite a number of additional heritage assets for Chobham?</li> <li>• Page 31 Primary residential – it is not “Brookleys Drive”, but just “Brookleys”</li> </ul>	Amend as required.

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<ul style="list-style-type: none"> <li>• 5.32 Philpott Lane (typo – should be Philpot) / “Red Lion Road/Windsor Junction” (should be Windsor Road junction not just Windsor junction)</li> <li>• 5.46 “Keeping the drains clear would stop accidents on the corner of Red Lion Road and Windsor Road” – not sure about this statement?</li> <li>• 5.53 “The Grange was redeveloped to 33 bungalows on part of the site circa 1985” – not sure if this was a redevelopment, I don’t remember there being much if any development there before? (Could be wrong)</li> <li>• 5.58 “bridge over Mill Brook” this may not go forward to be included in Local List. Cllr Victoria Wheeler stated in an SHBC meeting that the entire structure was a relatively modern rebuild. The Parish Council has asked for it to be checked that no historic fabric remains. Bridge is known as Emmetts Mill bridge, not bridge over Mill Bourne.</li> <li>• Page 49 Policy CH6 Heritage assets – if demolition can’t be avoided, the Parish Council has previously requested a) photographic and written records relating to the building to be made and deposited for archive with appropriate local organisations prior to dismantling and demolition, and b) assessment be made as to whether any significant parts of the building’s fabric or “finds” can be retained or conserved either on or off site, and that Historic England’s “Understanding Historic Buildings - A Guide to Good Recording Practice” is reviewed in the context of the loss of the building. Could something along these lines be considered for the policy?</li> </ul>	

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<ul style="list-style-type: none"> <li>• 6.15 Out of date photo of the neighbourhood parade (Inside Chobham closed down 2-3 years ago).</li> <li>• 6.18 “ii Former British Oxygen Company Site, Chobham (known locally as Highams)” – this site is now officially known as Highams Park.</li> <li>• 6.20 Re: Employment sites - I think figure 17 needs to be changed to figure 16 (also two mentions of figure 17 in the body of policy CH8).</li> <li>• 6.21 “In the absence of up-to-date adopted Local Plan policy, the CNP seeks to designate these four sites.” – there seems to be only three?</li> <li>• Page 56 CH8 4) onwards – seems to be just one site so should the language be singular rather than plural?</li> <li>• 7.4 “The Environment Act includes provision for a mandatory requirement for new developments to provide a 10% biodiversity net gain.” – is it worth adding that SHBC’s draft new Local Plan seeks 20% gain (policy E3)?</li> <li>• 7.7 Figure 17 graphic - Isn’t it Muntjac deer, not Moncjac?</li> <li>• 7.8 Table 5 - first picture looks more cropped than the others</li> <li>• 7.28 “... importance that verges and wildflower planting within the area.” Should it be “of verges...”? Suggest also include Chertsey Road which is at least as verdant an approach as the others mentioned.</li> <li>• 7.36 – Should field near Station Road be plural?</li> <li>• Page 72 – Is view 5 in the right place on the map and described correctly in the key? The footpath runs alongside the Village Hall but not behind it.</li> </ul>	



Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<ul style="list-style-type: none"> <li>• Page 78 (more of a personal note – there is no public cycle parking provision in the centre of the village, which is likely to discourage cycle trips to the local shops, eateries, commuting for village workers etc. Any chance of promoting some cycle parking places in the car park?)</li> <li>• 8.12 “there is a level of public support for a 20’s Plenty scheme” - could note the recent introduction of the 20 speed limit now this is a reality.</li> <li>• Page 85 CH15 Stray colon in 1) a) “bedroom: dwellings”. States it is to mirror the policy for Windlesham but Table 7 (Windlesham) states 4 spaces for 4+ bed houses and this isn’t reflected in CH15 which only goes up to 3+.</li> <li>• 9.4 Re: Youth club “(the previous one was changed into a community centre),” – there was a youth club building on land where the MacMahon Close “Heathlands” housing is now. To the best of my recollection the Community Centre was built on adjacent open/parking land. More recently, there was a youth club run from the Scout Hut on the Recreation Ground.</li> <li>• 9.5 Should SLP be SHLP?</li> <li>• 10.3 – 10.7 The outlined follow up work will be considerable – is this to be taken on by the Parish Council directly?</li> <li>• 11.1 Parish Council as a corporate body is an “it”, so “its powers” not “their powers”.</li> <li>• 11.2 Is it worth noting that the CIL and Section 106 are intended to be replaced with the new “Infrastructure Levy”?</li> </ul>	

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<ul style="list-style-type: none"> <li>• Page 95 Worth mentioning that SPDs are intended to be phased out?</li> <li>• Page 98 National Planning Policy Framework (amended July 2021) – links to December 2023 update so just the linked text needs updating.</li> <li>• Page 101 “The Chobham forms Design Guidance and Codes forms an integral part of the Chobham Neighbourhood Plan.” – one too many “forms.”</li> <li>• Page 107 (and elsewhere in the document) “Chobham Water Meadows” rather than “Chobham Meadows”</li> <li>• Page 108 – I’ve never seen anyone picnicking at the Water Meadows (long grass, lots of dogs), but happy to be corrected on that!</li> <li>• Page 110 Photo shows children with their backs to camera, maybe include a caption about the planting event for context?</li> <li>• Page 111 “Previously washed over green belt.” – see earlier comment for 2.3, it is still washed over green belt currently. Should Conservation Area be included as a designation for this and the others within it?</li> <li>• Page 117 “Canon” typo.</li> <li>• Page 117 Should Benham’s Corner and Cannon corner be two separate listings?</li> <li>• Page 118 “The old bus stop” – should this be “bus shelter”? I believe its name is Stearns bus shelter (double check needed).</li> <li>• Page 120 “None (will lose washed over green belt status in the emerging Local Plan)” – only a proposal at the moment. Conservation Area designation?</li> </ul>	

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<ul style="list-style-type: none"> <li>• Page 122 Re: Pet Cemetery “have even been trying to find the present owners.” – the Parish Council has an update on this. There has been communication with family of the owner.</li> <li>• Page 122 There isn’t an official designated Public Right of Way in the pet cemetery as far as I am aware (none shown on Surrey Interactive map).</li> <li>• Page 122: As well as the accesses listed, there is also access from Mincing Lane. I would suggest deleting Red Lion Road as an access point as it isn’t direct.</li> <li>• Page 126 Is CPC a co-owner of the Victorian Cemetery?</li> <li>• Page 128 “They are used for informal recreation.” – This field is private land and not used for “informal recreation” as far as I am aware.</li> <li>• Page 129 Designations – Conservation Area; Green belt</li> <li>• Page 131 Delete “A large grass playing field with play park, tennis courts, pavilion and parish offices, scout building and sports pavilion”</li> <li>• Page 132 “footpath running adjacent” – as per comment for Page 122, not a right of way. I think there is/was previously a permissive path, but unclear on whether that has been stopped up.</li> <li>• Page 133 Talks about fields, open nature and walkway – the site is private and densely wooded, so the description could perhaps be tweaked.</li> <li>• Page 138 View over Fair Oaks is more than just from Chertsey Road – there are significant sweeping views from Footpath 1 and Bridleway 3 either side. The airfield is not “criss-crossed with footpaths”. Re:</li> </ul>	

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			walking between Chobham and Woking, unfortunately the key footpath links 4 and 113 from Chobham are currently impassable from Philpot Lane.	
6.	6	General fact check	<ul style="list-style-type: none"> <li>• PAGE 59 Rural character. I have not found a specific reference to our good fortune in maintaining that character is due in no small part to the fact that many of the roadside spaces are in fact Manorial Waste , some of which is by accident of history also Registered as common land. These factors have provided the rural homogeneity which we have sought to maintain by objecting to attempts by frontagers to expand their ownership by adding white stones and posts and urbanizing tweerie such as wishing wells etc. I suggest that resisting such clutter would be that much more difficult if we lose our ' green wash'</li> <li>• Page 67 Local Green Spaces - These ought to include Burrow Hill Green (on which I produced a detailed contribution along the way) and all of Little Heath both (not only the green areas) of which should be afforded the maximum protection. Until recently the east side of the Green was used for village events such as the November 5th celebrations.</li> <li>• Page 84 In my experience of flat management one bed flats almost always generate two vehicles especially in areas that are as poorly served by public transport as Chobham.</li> <li>• Page 118 Why called Benham's Corner. For many years the Benham family operated Town Mill situated close by at the rear of the Co-op store. They also traded from shop premises on both sides of the</li> </ul>	<p>Noted and amended as necessary. First point is not a planning matter.</p> <p>The SG discussed but consider it is too late at Reg 14 to add a new site, that would require further consultation.</p> <p>Noted.</p> <p>This is the name attributed by the SG. It's been expanded to included Cannon Corner.</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>junction, selling bulbs and garden requisites from the west side, and provisions from the east, They also raised fields of tulips on what is now the water meadows Sang.</p> <ul style="list-style-type: none"> <li>1 On your views I am not sure that you have shown the most attractive around the cricket field/ church. Also across the fields from Station Rd roughly opposite Dayborns garage.</li> <li>2 You have featured a view of Fair Oaks but nothing of or from the Common. Probably the best view is from the north side of Jubilee Mount looking north across Albury Bottom towards Tank Hill, and another from Staple Hill Clump towards the North Downs. There is also the view north from Staple Hill with Wembley Stadium on the skyline .</li> <li>3 page 51 at 6.8 it is not a Farmers Market Marietta advses that It should be referred to a weekly Country Market.</li> <li>4 . 2.8 I don't know when you last pottered round the shops but as far as I know there are no antique shops and have not been for several years.</li> <li>5 Page 45 My pond never as been referred to as Staple Hill Pond. T was my observation during flash summer storms of the way storm water in 2006 and again a year later headed in great quantities directly to the village. It should be pointed out that it took over 10 years to overcome resistance from the various authorities finally as a result of Citizen pressure the borough the drainage engineer came up with the two Attenuation Ponds as now exist. These are virtually maintenance free and have have so</li> </ul>	<p>Noted. The photos can be updated if new ones are submitted.</p> <p>Views across the Common are not considered to require additional safeguarded as the land here is protected (as Common land).</p> <p>Noted and this has been amended.</p> <p>Removed.</p> <p>Noted. Reference removed.</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>far held back the millions of gallons of water coming off the common until the village streams can safely take it. The system works by the first pond having controlled water level by way of pipes through the first dam from which the water flows into the second pond which in turn is formed by the raised causeway which carries the Heathrow oil pipeline.</p> <ul style="list-style-type: none"> <li>The main concern revolves around the removal of the green wash something I can see as being dangerous to the setting of the village, and which will cause it to develop the appearance of those parts of the existing village which the planners say disqualify it from green belt village status,</li> </ul>	<p>This is outside the scope of the plan.</p>
7.	7	General	<p>Do not wish the NDP to preclude the site coming forward as a future allocation. These representations therefore, whilst promoting the Land at Fair Oaks Airport, largely ensure the CNP does not preclude / prejudice any draft allocation coming forward through the emerging Local Plan (i.e. such as CNP Draft Policies CH3 and CH12). Whilst the Land at Fair Oaks Airport is not currently identified in the Draft SHBC Local Plan, it is as an 'alternative' site included within the SHBC Sustainability Appraisal Growth Scenario 3.</p> <p>The CNP should not progress to a further consultation, until at least the emerging Draft SHBC Local Plan has progressed to formal submission. Options should be considered in the interim, to ensure the CNP is adaptive to the progress of the Local Plan.</p>	<p>The NDP is not seeking to allocate sites. The community has raised the importance of the land here as an employment site.</p> <p>The SHBC Plan has now been submitted (10 December 2024) and the CNP has been reviewed in light of this version.</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>The CNP fails to support economic growth and fails to support strong, vibrant communities. There is an opportunity at Fairoaks Airport to support expansion of the economic area beyond that identified as a 'Major Developed Site in the Green Belt'. See further detail within the Draft Policy CH8 section. At the very least, the CNP should be considering an approach to maintain/ enhance the vibrancy of the employment offer at Fairoaks Airport, which, as indicated by Vistry's evidence base enclosed, is still to be maintained as part of the new settlement promotion.</p> <p>Savills' view is that the plan period for the Neighbourhood Plan should begin in 2024, rather than 2019.</p> <p>The Neighbourhood Plan is likely to be Made from 2025 onwards, resulting in 6 years where the policies are not applicable (2019-2025).</p> <p>The Neighbourhood Area Profile (March 2023) is centred on Chobham itself. Land at Fairoaks is a substantial previously developed site which does need to be appropriately recognised in the CNP.</p>	<p>The CNP supports the continued use of the Fairoaks site for employment purposes and provides criteria as to circumstances that might demonstrate this not viable.</p> <p>The plan start period has been amended.</p> <p>There is a policy dedicated to safeguarding the Fairoaks site as a locally important employment site.</p>
8.	12	General	What about moving the green belt area?	Green Belt policy has now changed nationally.



Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
9.	13	Accessibility	<ul style="list-style-type: none"> <li>• There is a need to add alt text to all 112 images, or mark as decorative when appropriate. Where an image is from another source, or contains textual data, alt text needs to sufficiently explain to a visually impaired user what is in that image which they are not able to access. If this cannot be done in alt text, there should be main body text to support this. Examples of this include Figure 11, and Figure 25..</li> <li>• Add alt text to all tables, similar to images. – Yes can do this.</li> <li>• The hierarchy of Headings (styles) needs to be re-worked so Heading 1s are followed only by Headings 2s, etc. Currently, Heading 1s are followed by Headings 3s, and this can be confusing for screen reading software.</li> <li>• Ensure that there are no copy and pasted/raw links in the document. The NP utilises good practices by primarily embedding links into main body text, but there are three instances of copy and pasting links (found by CTRL + F and searching for “https”).</li> <li>• This is a minor point, but it would be good practice for Figure Headings/Titles to follow the same format as Table Headings/Titles, and come before the Figure so the visually impaired user will read this first, and then be presented with the Figure (and its associated alt text).</li> <li>•</li> </ul>	<p>ALL of the images have alt text on them already. The text provided is a description of what each image shows.</p> <p>Alt text has been added to the tables.</p> <p>Amend so that all chapters are H1 and subheadings are H2</p> <p>These have been embedded</p> <p>Amended</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
10.	9	Para 1.8	<p>Add the following the list of Development Plan documents:</p> <ul style="list-style-type: none"> <li>• Surrey Waste Local Plan 2019 (December 2020).</li> <li>• Surrey Minerals Plan Core Strategy 2011 (July 2011).</li> <li>• Surrey Primary Aggregates Development Plan Document 2011 (July 2011).</li> <li>• Surrey Minerals Site Restoration Supplementary Planning Document 2011 (July 2011).</li> <li>• Surrey Aggregates Recycling Joint Development Plan Document 2013 (February 2013).</li> </ul>	Added
11.	9	Para 3.2	We welcome the reference to Surrey's Climate Change Strategy and the role of planning in achieving net zero carbon, however we would recommend that paragraph 3.2 includes an objective about the Neighbourhood Plan supporting the delivery of net zero, for example all new buildings to be net zero operationally.	Added
12.	7	Policy CH1	is vital that the CNP does not preclude development coming forward within the SHBC Local Plan, hence Savills is supportive of Section 2e) of the draft Policy. The need for allocations in the CNP should await further progress with the emerging Draft SHBC Local Plan.	Noted.
13.	7	Policy CH2	Vistry have no specific comments to make it relation to the policy wording itself, however consider that the Land at Fairoaks would enable a greater housing mix and more affordable homes to be provided in line with draft Policy CH2.	Noted. The CNP is not allocating sites.

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
14.	10	Policy CH2	Could we make reference here explicitly to rural exception sites as a way to bring forward affordable housing locally. Perhaps local landowners who cannot build on the green belt would be willing to release land as a rural exception site, at a reasonable price. This being in the Neighbourhood Plan could encourage this with a Land Trust being formed by the local community to look after such properties.	Added.
15.	7	Policy CH3	Suggested amendment to Draft Policy CH3: 1) "Development proposals should conserve and, where practicable, enhance the character of the Conservation Area or Character Area in which it is located, <u>unless the proposal is located on land that does not reflect those particular characteristics</u> ". 2e) " <del>....not have a significant detrimental impact on the local views</del> <u>will be considered as set out in Policy CH12 CH9</u> -(Protection of locally significant views); ...."	All areas of the parish are within a Character Area as per the Design Guidance.  Deleted as no need to repeat in this policy.
16.	7	Policy CH4	The CNP does beyond government building regulations without any supporting evidence including viability testing, the policy is therefore unjustified.	Disagree. The CNP strongly supports but does not require, for this very reason.
17.	9	Policy CH4	"where measures will not have a detrimental impact on character, landscape and views". This might affect the ability to install solar panels and other forms of renewable energy generation. Therefore, it would be useful for the plan to highlight alternative renewable energy options such as solar roof tiles, which can be encouraged where conventional solar panels are considered to conflict with other plan policies.	Noted.  Added.

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>In policy CH4 2(a) to optimise passive heat gain, reduced fabric heat loss should be prioritised so that incidental room heat gains can become primary heat sources.</p> <p>Policy CH4 should promote the use of high levels of thermal insulation and airtightness for all building types to limit the installed peak heat loss, typically to ~10W/m2. The insulant should be chosen to achieve the lowest practicable U-value.</p> <p>We note that paragraph 5.20 refers to the introduction of the Future Homes Standards in 2025 and that fossil fuel heating (such as gas boilers) will be banned in new homes. We would recommend a statement in policy CH4 which refers to the Future Homes Standard.</p> <p>Supporting text - We would recommend that the codes include specific technical specifications for energy efficiency, for example setting the target energy consumption of 35 kWh/m2/yr. In addition, further guidance could be provided on how, for example, Air Source Heat Pumps and renewable energy generation can be included in designs.</p>	<p>Added as a new clause.</p> <p>It has not yet been introduced, therefore would wait till it has been as unsure we can refer to an unmade policy in the policy.</p> <p>Noted, the guidance promotes this and makes reference to further technical guidance.</p>
18.	9	Policy CH5	<p>We would recommend that in the justification section for Policy CH5 reference is made to SCC being the Lead Local Flood Authority (LLFA). SCC is designated as a LLFA by the Flood and Water Management Act 2010. Further details in relation to our role can be found here: Surrey Local Flood Risk Management Strategy - Surrey County Council (<a href="http://surreycc.gov.uk">surreycc.gov.uk</a>).</p>	Added

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>We note that information and a map have been included on fluvial flooding. We would recommend that information and/or maps are included regarding surface water flood risk within the Chobham area. Information is provided by the Environment Agency: Check the long term flood risk for an area in England - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</p> <p>Following paragraph 5.39 we would recommend that a paragraph is included on riparian owners and the maintenance of watercourses. A riparian owner is the person, or people, with watercourses on, next to or under their property. Riparian responsibilities usually lie with the person who owns the land or property but may be the tenant depending upon the agreement in place. Reference should be made to the living next to a watercourse SCC Guidance and the need for Ordinary Watercourse Consent for any changes to watercourses.</p> <p>We would recommend that as well as referring to Policy E6 of the emerging Local Plan in paragraph 5.43, there is also reference to paragraph 175 of the NPPF, which states that <i>'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.'</i></p> <p>To provide clarity, we would suggest that the following text is added to paragraph 5.44: 'Aside from the control of surface water flows, the SuDS approach also provides benefits in terms of water quality and multifunctional biodiversity and amenity improvements.' Also, the</p>	<p>Added.</p> <p>Added.</p> <p>Added.</p> <p>Added.</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>following text should be added to paragraph 5.45 <i>'...Chobham, this might be achieved by maximising the use of "natural" SuDS features, including but not limited to swales, streams, storage ponds, reed beds and bunds.'</i></p> <p>We would recommend adding details in paragraph 5.47 to the SCC pre-application service in relation to the management of surface water: Planning Advice - Sustainable Drainage Systems (SuDS) - Surrey County Council (surreycc.gov.uk) Sustainable Drainage System Design Guidance - Surrey County Council (surreycc.gov.uk).</p> <p>Point 3 of policy CH3 should be amended to state: <del>The hierarchy of discharge option preference is:</del> <b>Surface water should be managed and discharged in accordance with the drainage hierarchy and the</b> definitions for SuDS and LLFA included in the Glossary.</p> <p>We would recommend that Wayne Purdon, Surrey Heath Drainage Engineer is specifically consulted in relation to this section. Wayne is extremely knowledgeable and will have a lot of local information.</p>	<p>Added</p> <p>Added</p> <p>Suggest consulting at Reg 16.</p>
19.	12	Policy CH5	<p>Para 5.38 - I disagree with properties on Philpot Lane being at risk from flooding, whilst the gardens are at risk the houses have never been flooded. As this will impact mortgages and house insurance it would be good to modify this statement. Chobham sewage Treatment works, on Thames site it quotes a £12m upgrade not £10m Redirecting HGV's from the village centre by altering SatNav guidance to private companies - the HGV</p>	Noted but this has been recorded.

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			Sat nav systems already notate that the High street and Philpot are 7.5T limits, but the drivers ignore this. What is really needed are cameras to capture the 64 illegal journeys per day through the High Street, to deter drivers ignoring their SatNav warnings.	
20.	9	Policy CH6	<p>We welcome the treatment of the historic environment in the Neighbourhood Plan. We note that there is a strong heritage thread running through the document, as well as a dedicated heritage section. We welcome the references to the historic environment not only in the preamble and the heritage policy, but also specific accommodation in the community “Vision” (Objective 2), and the policies on development location (CH1), character and design (CH3), energy efficiency (CH4) and the village centre (CH7). The inclusion of a specific policy on views and vistas is particularly welcome, as is the fact that much of the guidance and reference material cited within the Neighbourhood Plan refers to locally-specific material such as the <i>Chobham Design Guidance and Codes</i>, meaning that the developmental cues for the area will reflect the local character appropriately.</p> <p>We are pleased to note that the heritage section and policy will complement the policies set out in the Surrey Heath Local Plan and that reference is made to the Surrey Heath version of the Locally Listed Heritage Assets list. We are also pleased to note that reference is made to archaeology.</p> <p>Policy CH6 (2) refers to “...a <i>Heritage Statement or similar...</i>” should be prepared to support an application</p>	<p>Noted.</p> <p>Noted.</p> <p>Amended.</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>possibly affecting archaeological remains. Whilst correct, the NPPF term for this document would be a “<u>Desk-Based Assessment</u>” when specifically relating to archaeology. A heritage statement is a more general document. We would recommend that this is changed to avoid the commissioning of the wrong type of survey.</p> <p>Figures 9 and 10 show the heritage assets referred to in the text. The Area of High Archaeological Potential (AHAP) sitting within Chobham village centre is difficult to see on these maps. We would recommend the inclusion of a separate heritage map rather than combining it with the character areas. Also, both maps are using the old AHAP and County Site of Archaeological Importance (CSAI) layer, which was replaced last year following a county-wide revision. To make sure the Neighbourhood Plan is accurate when the final version is published, we would recommend re-consulting the Surrey Historic Environment Record for the most up-to-date information on these designations. There are a few changes in the Chobham area which will be important to take into account.</p>	<p>Noted, however the maps will ultimately be accessed electronically, which will make it easier to turn layers on and off.</p>
21.	7	Policy CH8	<p><u>Amendment to Draft Policy CH8</u>  <u>Strategic Employment Site</u>            i Former Defence Evaluation and Research Agency (DERA) Site at Longcross near Chobham            ii Former British Oxygen Company Site, Chobham            iii <u>Fairoaks Airport</u></p>	<p>Noted. Text/ mapping adjusted as per SLP.</p>



Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>Should Fair Oaks Airport continue to be included as a Locally Important Employment Site, the following amendment is recommended:</p> <p><del>6d) the proposal would not be detrimental to the function and operation of the wider site; or</del></p> <p>The various supporting maps and figures would need to be adjusted to reflect the employment designation and any alteration to the Green Belt proposed by the emerging Draft Local Plan. This is a further reason to pause the production of the CNP to allow further progress with the Local Plan.</p>	
22.	8	Policy CH8	<p>The Neighbourhood Plan allocates Fair Oaks Airport as a draft Locally Important Employment Site, However, it is considered more appropriate to be allocated as a Strategic Employment Site on the basis of its scale and economic influence. It is equally comparable to other sites identified in the plan as SES.</p> <p>There is currently little available office, light industrial or industrial floorspace available in the eastern part of the SH Borough. The N Plan does not allocate any additional employment area, rather relies on redevelopment of existing sites to meet the demand for space. ADP consider this assessment unrealistic.</p>	The SG has discussed this and consider that the site is important economically. They would wish to retain this policy.

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
23.	7	Policy CH10	Greater clarity is required in the CNP and evidence base with respect of SANG provision, including additional SANG required to facilitate new development, and the positive aspects arising of its provision on Chobham and the wider area.	This is reviewed at the strategic level (SHBC).
24.	9	Policy CH10	<p>As responsible authority for the Local Nature Recovery Strategy (LNRS), SCC welcomes and supports the content of Policy CH10: Green and Blue Infrastructure and Delivering Biodiversity Net Gain. SCC's Natural Environment team has some minor comments relating to the plan.</p> <p>In Table 4, paragraph 7.5, under SSSI it states that Chobham Common is managed by Surrey Wildlife Trust. Please can this be reworded as SCC manages the sites public access and Surrey Wildlife Trust manages the conservation of the site?</p> <p>In Policy CH10, we recommend that the word 'nesting' is removed from the sentence in section f) as bats roost rather than nest. We would also recommend adding reference to the LNRS in section 4 of Policy CH10.</p> <p>A requirement of the Environment Act 2021 is the production of a LNRS in a collaborative and evidence-based manner and the engagement process for this commenced in 2023, with the strategy being scheduled to be complete by 2024. We would welcome Chobham Parish Council's involvement in this process to ensure local opportunities for nature recovery are identified and linked into a network for greater ecological resilience.</p>	<p>Noted.</p> <p>Amended.</p> <p>Deleted. Added.</p> <p>Noted – action for the Parish Council.</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
25.	14	Policy CH10	Verbal response suggesting inclusion of hedgehog fencing and bee bricks	Noted and included.
26.	3	Policy CH11 (Local Green Space)	Oppose the designation of their land (Broom Lane Allotments). State that it is private land and has a constitutional defined purpose which doesn't reconcile with inclusion in the NDP.	Retain as considered to be an important LGS.
27.	9	Policy CH11	<p>We note that policy CH11 proposes to designate Wishmore Cross Academy field, Playing Field west of High Street and Little Heath grass areas as Local Green Spaces.</p> <p>Wishmore Cross Academy is a secondary school and playing fields. SCC own the freehold, but the entirety is held by the Academy Trust under a 125-year lease. Playing Field west of High Street is a grass playing field used by the children of St Lawrence school. Appendix D states that Playing Field west of High Street is owned by St Lawrence School. This is incorrect, since although Playing Field west of High Street is used by St Lawrence School it is owned by SCC. Please could this be corrected?</p> <p>SCC supports the protection of green spaces. However, education land is fully protected under statute and is not open space fully accessible to the public. Local Green Spaces are usually available for public use and so such a policy might conflict with the schools' safeguarding and community shared use arrangements. We therefore object to the proposals to designate Wishmore Cross Academy field and Playing Field west of High Street as Local Green Space.</p>	<p>Information has been amended.</p> <p>The spaces are considered important for the community and have been retained into the Submission Version.</p> <p>This is correct, no additional rights of access are conferred.</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>Whilst designation does not in itself confer any rights of public access over what exists at present, if they were to be designated any additional access would be a matter for separate negotiations.</p> <p>We would also like to see the plan acknowledge that exceptions to Policy CH11 might be acceptable where schools need to expand for operational reasons and as a last resort the only land available may comprise part of an existing playing field. There may be rare circumstances where the most sustainable option is to expand a school on at least part of a school playing field site, where this is to meet residents' needs and deliver sustainable development, community wellbeing and life-long learning objectives. Any such circumstance would need to ensure that any adverse effect on the function and character of open space be minimised.</p> <p>Clearly playing fields should be protected from loss to development, however <i>'Local Planning Authorities should take a proactive, positive and collaborative approach'</i> to meeting the requirements for a sufficient choice of school places for existing and new communities. As per Paragraph 99 of the National Planning Policy Framework, <i>'Local Planning Authorities should give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications.'</i></p>	<p>This is noted, however, it is considered that the LGS designation would not prevent this.</p>
28.	11	Policy CH11	<p>The objector is largely supportive of the Pre-Submission Plan, however for many reasons he has serious concerns regarding the proposal to allocate the 'Field near Fire Station', which is marked as area '12' on Figure 19 and as</p>	<p>This has been discussed and the LGS has been removed.</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>described in Appendix D, as a Local Green Space under Policy CH11. This objection focuses on that matter.</p> <p>The Plan appears to target the 'Field near Fire Station' unreasonably, in that the land is not demonstrably special to the local community, nor does it have particular local significance (because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife) as required by NPPF Paragraph 106. Compared to the other proposed Local Green Spaces, this site is clearly at odds with the requirement to be demonstrably special, for the reasons set out above.</p>	
29.				
30.	7	Policy CH12	<p>This view over Fair Oaks concerns the Site at Fair Oaks Airport. As set out above, no landscape evidence accompanies the draft CNP in respect of these views. The view is therefore unjustified by evidence.</p> <p>Suggest deletion of this view.</p>	<p>The view has been retained and additional photography added to demonstrate its importance locally. The view is valued by local people, which has been demonstrated through the neighbourhood plan engagement process.</p>
31.	8	Policy CH12	<p>It is noted that of the 8 identified views, 7 relate to views within Chobham Village itself. Only view 8 lies outside of the village, at Fair Oaks and it is surprising that the Parish contains no similar worthy views other than the one identified here.</p> <p>This appears to be an opportunistic designation which seeks to inhibit the development ambitions at Fair Oaks, particularly in regard to the current planning application for two film studios.</p>	See above.

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>In any event, the view identified is not supported by any rational landscape impact appraisal and appears to be illogical in selection of the viewpoint itself.</p> <p>Furthermore, it should be noted that this view which is proposed to be protected, is directly impacted by an extant prior notification exemption for a large hangar building in the location shown below in red dotted line.</p> <p>For this reason, the proposed protected view should be deleted from the plan as it is already compromised by a large building which has extant permission to be erected and is likely to be constructed should be current studio application fail.</p> <p>A formal objection is therefore raised to Policy CH12 in respect of View 8 and it is requested that this be deleted.</p>	
32.	7	Policy CH14	The proposals at Fair Oaks contain extensive walking, cycling and equestrian opportunities. Figures 14 and 15 within Appendix 3 demonstrates the provision of pedestrian / cycleways through the Site and to Woking.	Noted
33.	9	Policy CH14	We note that reference is made to the Local Transport Plan (LTP4) and Local Cycling and Walking Infrastructure Plans (LCWIPs). The Surrey Heath LCWIP is currently being finalised. The draft Plan identifies key walking and cycling corridors and prioritises a programme of active travel infrastructure improvements in the borough. The draft LCWIP identifies a Phase 1 (priority) core walking zone in Chobham which may provide opportunities to	Added

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>review and design walking infrastructure improvements. It also identifies Phase 2 cycling corridors (second category of prioritisation) along the A3046 (which is consistent with proposal D on page 80 of the Neighbourhood Plan) and A319 into Chobham.</p> <p>We would recommend that reference is made to <a href="#">Healthy Streets for Surrey</a>, which is the county's street design policy adopted in 2022 and now presented as a webtool. Its contents must be integrated into any design code included in the Neighbourhood Plan for new developments and street retrofit/ redevelopment situations.</p> <p>In Surrey, we want streets that are welcoming, safe and attractive for all to access and enjoy. Our Healthy Streets for Surrey raises the standard of street design, creating streets which are safe, green, beautiful, and resilient in line with the ambitions of the Community Vision for Surrey 2030.</p> <p>We would also recommend that reference is made to the <a href="#">Rights of Way Improvement Plan (ROWIP)</a>, which is a statutory document. The present document runs from 2014-24 and we are in the process of reviewing and writing the ROWIP for 2024-34. Information regarding this is found through the above link. It is important that this document is referenced as part of any neighbourhood plan regarding public rights of way or as part of any reference to policy CH14 of the Neighbourhood Plan.</p>	<p>Added.</p> <p>Added.</p> <p>Added.</p>

Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
34.	9	Policy CH15	<p>Paragraph 8.18 refers to SCC's 'Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development' (September 2021). SCC's Transport Development Planning team have produced a revised version of this parking guidance, dated February 2023, a copy of which is attached. This paragraph should be amended so that it refers to the most recent up-to-date guidance and Table 6 should be updated i.e. removing the brackets for 1 &amp; 2 bed houses, 3 bed houses and 4+ bed houses.</p> <p>As Chobham is largely a rural parish with a high level of car ownership, Policy CH15 should include a requirement for Electric Vehicle charging points to be provided within all new residential developments, in accordance with SCC's Parking Guidance (pages 12-17), paragraph 116(e) of the NPPF 2023, and to help meet the objectives of LTP4.</p> <p>Policy CH15 states that new residential developments should provide adequate space for cycle parking and storage. This should also include a requirement for the provision of a charging point with timer for electric bikes adjacent to any cycle parking facilities. In most residential settings, the provision of e-bike charging points could also be used for the charging of mobility scooters.</p>	<p>Added a link to the website on this.</p> <p>This is now required nationally.</p> <p>Added.</p>
35.	7	Policy CH16	There is the opportunity for these spaces to be provided within proposals at Fair Oaks.	Noted
36.	12	Policy CH16	Can we get a decent running track put around the Pav Rec ground?	Noted, although only one comment on this.



Ref.	Who?	Page/para/ policy	Comments/ Proposed change	SG response
37.	12	Policy CH16	I couldn't find any mention relating to our medical practice. I feel that this is an important community facility and every effort needs to be made to retain a medical facility within the village. Whilst travel to West End isn't far it isn't always convenient especially for the elderly - of which the plan rightly says is a growing community within Chobham. I also don't recall seeing any mention of school and nursery provision - another important facility within the village and which needs to remain here to encourage younger families.	Provision of these falls outside the scope of the NDP, but amend supporting text to mention their importance.
38.	9	Design Guidance	We welcome the supporting document: Chobham Design guidance and codes and are pleased to see that the document includes some consideration of energy efficiency and sustainability in the design code. We would recommend that the codes include specific technical specifications for energy efficiency, for example setting the target energy consumption of 35 kWh/m2/yr. In addition, further guidance could be provided on how, for example, Air Source Heat Pumps and renewable energy generation can be included in designs.	Noted. This has been produced externally and advice is that such technical guidance may be updated over time, so is not explicitly included.



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The Clerk  
Chobham Parish Council  
Station Road  
Chobham  
Woking GU24 8AJ

18 June 2024

Dear Sir/Madam,

**RE: Invitation for comments on the Pre-Submission Consultation (Regulation 14) Chobham Neighbourhood Plan**

I refer to the consultation sent to Surrey Heath Borough Council to invite comments on the Pre-Submission Consultation of the Chobham Neighbourhood Plan 2019-2038 which is currently at Regulation 14 stage of the Neighbourhood Development Planning Regulations 2012 (as amended). Under delegated authority, I am responding formally to this consultation on behalf of the Council.

It is noted that, quite correctly, policies, and supporting text, have been drawn from policies in the emerging local plan. An example is the reliance on the revised settlement boundary for the village drawn from the Regulation draft of this emerging local plan, which is still at a relatively early stage. The policies in the emerging local plan are subject to change and this could result in discrepancies between the neighbourhood plan and the emerging local plan which should be avoided. There are references within the comments below where this is particularly important.

Please find below provides the Council's response in relation to the Pre-Submission Consultation of the Chobham Neighbourhood Plan:

The following sections provide planning related comments on each section of the Regulation 14 draft Chobham Neighbourhood Plan where required. The comments provided reflect the order of the Plan.

**Chapter 1. Introduction**

**The Planning Policy Context**

Paragraph 1.8 lists out the policy documents comprising the Development Plan for Surrey Heath Borough Council. The Development Plan also includes the adopted Surrey Minerals Plan 2011 and Surrey Waste Local Plan 2020. To note, a Minerals and Waste Local Plan review has commenced. A second 'Call for Sites' exercise ended in 2024 and a Preferred Options consultation is anticipated for June 2025. It is therefore recommended that paragraph 1.8 is amended as follows:

**Adopted Development Plan:**

**1.8 The adopted Development Plan for Surrey Heath borough comprises the**

following:

- The Core Strategy and Development Management Policies Development Plan Document 2012 and the Policies Map 2012
- The 2000 Local Plan (extant saved policies)
- Camberley Town Centre Area Action Plan (2011-2028) and Policies Map
- Saved Policy NRM6 of the South East Plan which relates to development affecting the Thames Basin Heaths Special Protection Area;
- Surrey Minerals Plan 2011
- Surrey Waste Local Plan 2020
- 'Made' neighbourhood plans in the borough

### **A new Local Plan for Surrey Heath**

It is recommended that paragraph 1.15 is as follows:

**1.15 A new Local Plan for Surrey Heath (2019-2038) is in the process of being developed. The Draft Surrey Heath Local Plan: Preferred Options (2019 - 2038) was consulted on at Regulation 18 between March and May 2022. The Local Development Scheme suggests the Regulation 19 consultation will take place in summer 2024 with adoption proposed for Autumn 2025. Once adopted, the Local Plan will replace the Core Strategy and Development Management Policies Development Plan Document 2012 and the Policies Map 2012, the 2000 Local Plan saved policies, the Camberley Town Centre Area Action Plan (2011-2028) and Policies Map. However, saved Policy NRM6 of the South East Plan 2009, which is to remain as a part of the Development Plan.**

### **Community Engagement**

Table 1 Summary of community engagement sets out the stages of producing a neighbourhood plan. It would be helpful if the table indicated the current stage of the Neighbourhood Plan at Regulation 14 consultation and differentiated with future stages of the neighbourhood plan process. It is therefore recommended that Table 1 is amended as follows:

<b>2023 to 2025</b>	<b>Pre-Submission Version (Regulation 14) Plan published</b>  <b><u>Publish</u> Regulation 16 Plan published</b>  <b>Examination</b>  <b>Referendum</b>	<ul style="list-style-type: none"> <li>• <b>SEA/HRA Screening prepared</b></li> <li>• <b>Pre-Submission (Regulation 14) consultation</b></li> <li>• <b>Amend Plan appropriately into Submission Version and submitted, with supporting documents to SHBC</b></li> <li>• <b>SHBC run Regulation 16 consultation</b></li> <li>• <b>Independent examination of Plan and finalisation for Referendum</b></li> <li>• <b>Plan 'made' and form part of the local development plan</b></li> </ul>
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### **Policy CHI: Location of development**

Supporting text to Policy CHI provides a clear explanation of how new development is expected to come forward in the area, and provides a summary of proposals relevant to the area within the emerging new Local Plan. The Neighbourhood Plan demonstrates a good understanding of the content of the emerging new Local Plan relating to the Parish, and includes proposals for the area relating to settlement boundary amendments and housing allocations.

Policy CHI is consistent with the emerging new Local Plan regarding proposed amendments to the settlement boundary and housing allocation, and does not seek to allocate any additional development for the area beyond that included within the emerging new Local Plan.

Policy CHI seeks to build on policy requirements for the area within the Core Strategy and emerging new Local Plan, by providing additional policy requirements relating to coalescence, character and appearance, road and pedestrian safety, and biodiversity enhancements. The Policy goes beyond requirements within the Core Strategy and emerging new Local Plan by seeking to provide additional restrictions relating to backland development, requiring consideration of impacts on the character and appearance of the area to be undertaken to determine if development would be appropriate in that backland location.

Part I of Policy CHI refers to the Chobham settlement boundary, and amendments being proposed through the emerging new Local Plan. It should be noted that the new Local Plan remains in production, and proposals it contains are subject to change. It is therefore recommended that the content of the Neighbourhood Plan, particularly relating to proposals within the emerging new Local Plan, is checked and carefully considered in collaboration with the Borough Council prior to the submission of the Neighbourhood Plan to the Council for examination.

It is recommended that the word 'must' is replaced by 'should' to allow for some flexibility and interpretation of the Policy by users. It is also recommended that part h) of Policy CHI is removed as it includes unnecessary repetition of the requirements of Policies CHI4 and CHI5.

Part i) of the Policy relates to biodiversity net gain. Policy requirements associated with biodiversity are covered in Policy CHI0. It is therefore recommended that part i) of Policy CHI is removed as the Plan should be read as a whole and it therefore includes unnecessary repetition of the requirements of Policy CHI0.

The requirement for proposals to mitigate any impacts on landscape tranquillity may be challenging to assess in planning applications and implement through the decision making process. It is therefore recommended that reference to tranquillity in 2) g is explained in more detail within the supporting text, to outline how applicants and decision makers should assess and determine tranquillity.

Policy CHI should specify the version of the NPPF to which it refers to ensure the policy requirements remain clear if a new NPPF is published after the Neighbourhood Plan is 'made'. All NPPF references should refer to the most up to date version (December 2023) of the NPPF.

Policy CHI appropriately references paragraphs within the NPPF relating to development within the Green Belt, and the overall policy approach has regard to the content of the NPPF. The Policy generally conforms with emerging and adopted local planning policy, and is therefore considered appropriate as a policy to be included within the Neighbourhood Plan.

#### **POLICY CH1: LOCATION OF DEVELOPMENT**

**1) Development in the neighbourhood area will be focused within the settlement boundary as defined in Figures 3 and 4, or as shown in the Surrey Heath Local Plan 2019 - 2038 once adopted.**

**2) Development proposals will be supported where they are in accordance with national and local policy in respect of:**

- a) within the Green Belt, proposals must meet either the exceptions to inappropriate development in the Green Belt, or demonstrate very special circumstances, as set out in paragraphs 154 and 155 of the National Planning Policy Framework (2023); or**
- b) it relates to limited infilling or the partial or complete redevelopment of previously developed land so long as it meets the criteria set out in paragraphs 154 (g) of the NPPF; or**
- c) the development brings redundant or vacant agricultural/farm buildings into use or historic buildings of heritage value back into viable use consistent with their conservation; or**
- d) it relates to necessary utilities infrastructure and where no reasonable alternative location is available; or**
- e) it is on sites allocated for in the Surrey Heath Local Plan or its successor.**

**Such development ~~must~~ should:**

- f) not individually or cumulatively result in physical and/or visual coalescence and loss of separate identity of Chobham and its neighbouring settlements Woking, West End, Knaphill and Windlesham; and**
- g) preserve or enhance the character or appearance of the area, with consideration given to how the proposal will mitigate any impacts on the character, or visual amenity, ~~or tranquillity impact~~ on the landscape; and**
- ~~h) not, because of traffic generation and parking, adversely affect road and pedestrian safety; and~~**
- ~~i) enhance the biodiversity of the parish, in accordance with Policy CH10 (Green and blue infrastructure and delivering biodiversity net gain).~~**

**3) Proposals for development of backland sites, including residential garden land, will not be supported where it would result in harm to the character and appearance of the local area.**

**4) In determining development proposals, substantial weight will be given to the value of using suitable brownfield land within the settlement boundary of Chobham for either homes, employment uses or other identified needs, or to support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.**

#### **Policy CH2: Meeting local housing needs**

Policy CH2 seeks to ensure that any new housing provided in the area meets local needs in relation to house size, type, and tenure. The supporting text to Policy CH2 demonstrates a good understanding of aims and content of adopted and emerging local policies and associated evidence relating to the provision of housing types and tenures in the area.

The Neighbourhood Plan has sought to add to the adopted and emerging Local Plan policies and evidence by producing more locally specific evidence for the Parish through a Local Housing Needs Assessment. The production of this Assessment included a housing survey of the local residents. The supporting text to Policy CH2 summarises the findings and recommendations of the Housing Needs Assessment undertaken. Policy CH2 requires the mix of new housing sizes, types, and tenures proposed for the area to assist in meeting housing needs as outlined within the Housing Needs Assessment. This policy requirement provides appropriate flexibility by stating that the requirement is subject to what is reasonably practical and financially viable for the development. This approach is generally consistent with national and local policy relating to housing mix in new developments.

Paragraph 4.12 of the supporting text refers to the 2020 Surrey Heath Housing Needs Assessment. This has been superseded by the 2024 Surrey Heath Local Housing Needs Assessment which identifies a new housing mix for the Borough. It is therefore recommended that the Neighbourhood Plan refers to the 2024 Assessment and its findings.

Paragraph 4.22 of the supporting text refers to affordable rent and part 3 of Policy CH2 refers to social rent. It is therefore recommended that the Neighbourhood Plan is consistent in referencing housing types to avoid any potential confusion.

Parts 2 and 3 of Policy CH2 are more prescriptive, listing a preferred mix to be used within new developments in the area and a preferred split between social rented and intermediate housing. It is generally accepted that the conclusions of a housing needs assessment should only be used as a guide to inform development proposals, as there will often be site specific challenges and limitations which may not allow a prescribed mix to be achievable. To allow for this flexibility, policies usually require development proposals to take account of recommendations within housing needs assessments rather than setting out specific quantities within the policy text. As an example, this is the approach taken within the emerging draft Local Plan Policy H5, where new development proposals would be permitted where they 'reflect the housing need, set out in the Housing Needs Assessment (2020) or any subsequent update'.

It is therefore recommended that the Neighbourhood Plan Steering Group should remove parts 2 and 3 of Policy CH2, as these requirements are considered to be too prescriptive. Part 1 of the Policy requires development proposals to assist in meeting needs identified within the Housing Needs Assessment, and this requirement is sufficient to encourage new development to meet identified local housing needs. Policy CH2 could be improved by adding a requirement for development proposals which do not provide the preferred housing mix for the area as presented within the Housing Needs Assessment, to clearly demonstrate why the preferred housing mix has not been provided. This will assist the Parish Council to determine if an alternative mix would be acceptable when reviewing development proposals.

Part 4 seeks to increase the minimum discount being applied to first homes from 30% as presented within the emerging draft Local Plan, to 50%. While this goes beyond the minimum outlined within the draft Local Plan, the supporting text to Policy CH2 outlines the reasons why an alternative approach should be taken within Chobham Parish. We note the setting of a local approach in neighbourhood plans is supported in the Planning Practice Guidance. The Policy text within this section is however ambiguous and would benefit from the use of more clear requirements. The term 'particularly supported' is unclear, as proposals within planning are either supported or not. It is recommended that part 4 is amended to state that 'where appropriate and subject to viability, first homes proposals in the area should be sold at a minimum discount of 50% below their full market value'. Where this would not be possible, national and local policy would apply to ensure the minimum 30% discount, this therefore does not need to be stated within the Policy. Part 4 refers to the prioritisation of affordable housing to those with a local connection to Chobham Parish and key workers. It is recommended that further information is provided within either the supporting text or the glossary to outline in further detail what a local connection means. For example, if this relates to family connections or employment connections, and if both which should be prioritised where competing applications for local connections are made.

Part 5 refers to the HAPPI principles. To assist users of the Policy, it is recommended that paragraph 4.25 in the supporting text provides further detail and explanation on the HAPPI principles. In summary, the following amendments are recommended to Policy CH2.

## **POLICY CH2: MEETING LOCAL HOUSING NEEDS**

**1) Other than in development designed to meet an identified specialist housing need, the mix of housing sizes, types, tenures, and affordability in proposed development should, in so far as is reasonably practicable and subject to viability, assist in meeting needs identified in the most recently available Chobham Local Housing Needs Assessment.**

**2) ~~Proposals which provide a mix of dwelling sizes based on the following distributions across the site, to address the needs of single people, young couples, smaller families and those wishing to downsize will be supported:~~**

- ~~• Market: 1-bed (10-15%); 2-bed (25-30%); 3-bed (35-40%); 4+bed (15-20%)~~**
- ~~• Affordable intermediate: 1-bed (10-15%); 2-bed (45-50%); 3-bed (30-35%); 4+bed (10-15%)~~**
- ~~• Affordable rented: 1-bed (30-35%); 2-bed (25-30%); 3-bed (30-35%); 4+bed (10-15%)~~**
- ~~• All dwellings: 1-bed (15-25%); 2-bed (25-30%); 3-bed (30-35%); 4+bed (15-20%)~~**

**3) ~~Proposals will be supported that deliver an appropriate mix of affordable housing, based on a 30:70 split between social rent and affordable housing for sale (intermediate housing)~~**

**4) At least 25% of the affordable housing units must be delivered as First Homes. ~~Proposals that enable an uplift of up to 50% to the discounts provided on the First Homes element of the development to assist single occupants on median and lower quartile income, will be particularly supported. Where such an uplift is demonstrated to be unviable, proposals should provide at least a 30% discount. Where appropriate and subject to viability, first homes proposals in the area should be sold at a minimum discount of 50% below their full market value.~~ Such proposals for affordable housing should seek to prioritise those with a local connection to Chobham parish (see Glossary) and key workers.**

**5) Residential development that could reasonably be expected to meet the needs of older people (by virtue of its size and location) should demonstrate how it has reflected the Housing our Ageing Population Panel for Innovation (HAPPI) principles.**

**6) Subject to the other policies of this plan, proposals for self- and custom build housing will be supported.**

## **Chapter 5. CHARACTER, HERITAGE, AND DESIGN**

### **Policy CH3: Character and Design of development**

Policy CH3 seeks to achieve high quality design and to ensure that new development is in keeping with local character and the historic environment. The supporting text to Policy CH3 demonstrates a good understanding of the local character of the area.

Policy CH3 seeks to build on policy requirements for the area within the Core Strategy and emerging new Local Plan, by providing additional policy requirements relating to locally specific character areas and local streets. The Neighbourhood Plan has sought to add to the adopted and emerging Local Plan policies and evidence by producing more locally specific evidence for the Parish through the Design Guidance and Codes for Chobham. Supporting text to Policy CH3 describes four local Character Areas identified in the Design Guidance and Codes for Chobham. It is considered that the proposed character areas are positive and logical.

Policies should be clear and unambiguous. As presented, part I of the Policy is hard to read and understand. It is therefore recommended that part I is presented as a list of criteria for clarity.

Part b of Policy CH3 refers to the reduction/consolidation of road signs and other street furniture. This policy requirement goes beyond the purpose of the Neighbourhood Plan. It is therefore suggested that it is moved into the supporting text to Policy CH3, potentially as an action to be discussed with the Surrey County Council as the Highway Authority.

The Plan should be read as whole, and there is therefore no need to repeat similar policy requirements within multiple policies. Part d of the Policy relates to the use of sustainable transport and parking. Policy requirements associated with sustainable transport and parking are presented respectively within Policies CH14 and CH15. It is therefore recommended that part d of Policy CH3 is removed, as it includes unnecessary repetition of the requirements of Policies CH14 and CH15.

Part e of the Policy relates to local views. Policy requirements associated with development proposals affecting local views are presented within Policy CH12. It is therefore recommended that part e of Policy CH3 is removed, as it includes unnecessary repetition of the requirements of Policy CH12.

Part f of the Policy relates to Conservation Areas and other heritage assets. Policy requirements associated with development proposals affecting Chobham Conservation Area and heritage assets are presented within Policy CH6. It is therefore recommended that part f of Policy CH7 is removed, as it includes unnecessary repetition of the requirements of Policy CH6.

References to other Neighbourhood Plan policies in Policy CH3 are incorrect. Part d refers to sustainable transport and Policy CH11. Sustainable transport is covered in Policy CH14. It is therefore recommended that part d refers to Policy CH14.

In summary, the following amendments are recommended to Policy CH3:

#### **POLICY CH3: CHARACTER OF DEVELOPMENT**

**1) Development proposals should conserve and, where practicable, enhance the character of the Conservation Area or Character Area in which it is located (as shown on Figures 7 and 8, described in the Chobham Design Guidance and Codes, Appendix B).**

**2) Development proposals should incorporate a high quality of design, which responds and integrates well with its surroundings, meets the changing needs of residents and minimises the impact on the designated natural environmental attributes of the parish. The scale, character, and siting of the proposal should:**

**a) respect the landscape and its features, valued views into and out of the settlement, the local streetscape and heritage assets: and**

**b) reflect the architectural variety found locally, using materials that are in keeping with those used in existing buildings in the immediate locality.**

**Innovation in design will be supported where this demonstrably enhances the quality of the built form in a local character area.**



**3) Development proposals should demonstrate how they have sought to address the following matters as they are appropriate to their scale, nature and location:**

**c) the Chobham Design Guidance and Codes, the Surrey Heath Residential Design Guide, the Surrey Landscape Character Assessment (Surrey Heath Borough) and the Chobham Conservation Area Character Appraisal; and**

**d) make a positive contribution to the visual appearance of the main approaches into Chobham village (Bagshot Road, Station Road, Windsor Road, Chertsey Road, Windlesham Road and Castle Grove Road).**

**Improvements and enhancements should include, where appropriate, additional tree planting, the enhancement of roadside green spaces (for instance through planting), ~~the reduction/consolidation of road signs and other street furniture~~ and wider green infrastructure improvements that are identified as being necessary; and**

**e) incorporate soft landscaping and other boundary treatments including the retention and enhancement of established trees and hedgerows, or the replacement of these if not possible; and**

**~~f) promote the use of sustainable transport, in accordance with Policy CH11 CH14, and provide adequate vehicular access and space for cycle parking and vehicular off-road parking for residents, visitors and service vehicles, in accordance with the adopted Surrey Parking Guidance, or any more recently adopted standards; and~~**

**e) not have a significant detrimental impact on the local views as set out in Policy CH9 (Protection of locally significant views); and**

**~~f) they respect and protect the buildings and environment of the Conservation Area, listed buildings and the other heritage assets (including non-designated locally listed assets) of the parish, and~~**

**f) there is no unacceptable loss of amenity for neighbouring uses through the loss of privacy, loss of light or visual intrusion on the views and surroundings that create the backdrop to an area; and**

**4) Where development sites abut open countryside, development on the rural boundary edge should mitigate any detrimental visual impacts on the countryside. This should be achieved through the siting of lower density development at the rural boundary of the site in order to provide a gradual transition from the built form to open countryside, or by other means such as through a layout that clearly minimises the visual impact of any larger buildings on both the open countryside and existing village-scape.**

#### **Policy CH4: Energy efficiency and design**

Policy CH4 seeks to ensure that new housing incorporates sustainable design features appropriate to their scale, nature and location, and design and environmental performance measures and standards. Supporting text to the Policy highlights relevant outputs from the Community Survey regarding sustainable design features in new development.

Policy CH4 seeks to build on policy requirements for the area within the Core Strategy and emerging new Local Plan, by providing additional policy requirements relating to achieving higher design and environmental performance measures and standards. It is noted that parts f and g go beyond the policy requirements in the Core Strategy and emerging new Local Plan. While parts f and g do not contradict strategic local planning policy, they may be challenging for the Borough Council to implement for new development to deliver.

The requirement within part h of Policy CH4 for development to avoid or mitigate all regulated emissions may not be viable for all scales and types of development. It is therefore recommended that a reference to the viability of development is added to part 2 to ensure that the policy requirements are achievable for new development. This could include the following additional text: 'Proposals should seek to incorporate the following sustainable design features as appropriate to their scale, nature and location, where financially viable, practicable, and where measures will not have a detrimental impact on character, landscape and views'.

#### **Policy CH5: Minimising the risk of flooding**

Supporting text to the Policy provides a clear summary of flood risk and surface water flooding in the area and relevant infrastructure upgrades. The supporting text also provides examples of sustainable drainage systems for new development in the area. However, the naming of flood and surface water problem areas by road name or vicinity is not considered to be appropriate and it may be better to keep more general knowledge of the sources, experiences and risks.

Policy CH5 seeks to build on policy requirements for the area within the Core Strategy and emerging new Local Plan, by including policy requirements relating to surface water flooding and the sewerage system. Planning policies should be positively worded. As currently written, part 2 of Policy CH5 is negatively worded. It is therefore recommended that part 2 is rewritten positively as follows: '2. *Where necessary, proposals should be accompanied by appropriate mitigation and improvements to wastewater infrastructure in the area*'.

It is recommended that the following text is included in Part 1 of Policy CH5 to provide appropriate flexibility for development proposals where surface water disposal options are not available: 'Where surface water disposal options are available'.

#### **POLICY CH5: MINIMISING THE RISK OF FLOODING**

**1) The net increase in wastewater generation and the impact on the local sewerage and drainage network must be carefully considered in any new development proposal. Where surface water disposal options are available, development will be supported where it is demonstrated that its surface water drainage will not add to existing site runoff, enter any foul-combined sewer network, or cause any adverse impact to neighbouring properties and the surrounding environment.**

**2) Where necessary, proposals should be accompanied by appropriate mitigation and improvements to wastewater infrastructure in the area.**  
~~Planning proposals will not be supported unless there is sufficient capacity in the local sewerage system and that any new connections will not increase the risk of system back up/flooding or cause any adverse impact to the neighbourhood area environment.~~

**3) All development proposals are encouraged to incorporate Sustainable Drainage Systems (SuDS), as set out in the Chobham Design Guidance and Codes, with run-off rates no greater than greenfield sites. Design should be tailored to the underlying landscape character of the parish and, where possible, contribute towards the landscaping and biodiversity of the development and with provision made for future maintenance. The hierarchy of discharge option preference is:**

- a) Soakaway or other infiltration system;**
- b) Discharge into a watercourse;**
- c) Discharge to surface water sewer;**
- d) Discharge to combined sewer.**

**4) Proposals which allow surface water drainage into any combined sewer system will not be supported unless the developer can robustly demonstrate that the proposal is unable to make provision for surface water drainage to ground, watercourses or surface water sewers.**

#### **Policy CH6: Conserving heritage assets**

Policy CH6 seeks to protect and enhance the historic environment, supporting development proposals that will ensure Chobham retains its local character and distinctiveness by conserving and contributing to heritage assets. The policy approach and policy wording used within Policy CH6 is generally consistent with the adopted Core Strategy and emerging Local Plan.

The policy approach should have regard to the content of the NPPF. NPPF paragraph 212 refers to preserving the elements of a heritage asset's setting that make a positive contribution to the asset. The policy requirement in Part 1 of the Policy recommends development proposals should conserve and enhance the significance of heritage assets and their setting. Not all development proposals will be capable of enhancing affected heritage assets. It is therefore recommended that part 1 is reworded to state instead 'preserve or enhance'.

Part 2 seeks to ensure that development proposals demonstrate they have taken into account the potential impacts on above and below ground archaeological deposits, and this requirement is sufficient in encouraging new development to consider archaeological deposits. Policies should only include policy criteria helpful to decision makers in assessing planning applications, and some of the text within Policy CH6 is not necessary for this purpose. It is therefore recommended that the following text is moved from part 2 into the supporting text for Policy CH6: *'to ensure that evidence which could contribute to the understanding of human activity and past environments is not lost'*.

Part 2 requires all development proposals to take into account the potential for archaeological deposits, however Core Strategy Policy DM17 and emerging new Local Plan Policy DH7 only require a desk-based assessment for development sites within Areas of High Archaeological Potential or County Sites of Archaeological Importance or major development sites of 0.4ha or greater. It is therefore recommended that part 2 of Policy CH6 is reviewed to ensure consistency with the policy requirements of Core Strategy Policy DM17 and emerging new Local Plan Policy DH7.

The repetition of Local Plan policies within a Neighbourhood Plan should be discouraged. Policy requirements in Policy CH6 repeat policy requirements in emerging Local Plan Policy DH7: Heritage Assets, and could therefore be removed to reduce the length of the Policy. It is therefore recommended that repetition between the two Policies relating to archaeological remains, heritage assets at risk and development in Conservation Areas is removed.

In summary, the following amendments are recommended to Policy CH6:

#### **POLICY CH6: CONSERVING HERITAGE ASSETS**

**1) Development proposals affecting designated heritage assets either directly or indirectly, should preserve or ~~conserve~~ and enhance the significance of the asset and those elements of the setting that contribute to the significance. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area. Proposals affecting non designated heritage assets will be assessed having regard to the scale of any harm or loss against the significance of the heritage asset.**

~~2) Development proposals should demonstrate that they have taken into account the potential impact on above and below ground archaeological deposits to ensure that evidence which could contribute to the understanding of human activity and past environments is not lost. Where a scheme has a potential impact on archaeological remains (below or above ground) a Heritage Statement or similar should be prepared in support of planning applications.~~

~~3) A proactive stance will be taken to any heritage assets that may be at risk. This will include working with property owners to find a use that will enable them to be put back into optimum viable use consistent with their conservation.~~

~~4) Particular care should be taken in the Conservation Area to ensure that alterations and new buildings contribute to the enhancement of the historic environment, in accordance with the guidance set out in the Chobham Conservation Area Appraisal and the Chobham Design Guidance and Codes.~~

## **Chapter 6. THE VILLAGE CENTRE AND WIDER ECONOMY IN CHOBHAM**

### **Policy CH7: Chobham Village Centre**

Policy CH7 seeks to maintain and improve the village centre, supporting development proposals that will help to ensure the centre remains vibrant, attractive, safe and accessible. The Neighbourhood Plan is supportive of the Neighbourhood Parade designation applied to retail premises on Chertsey Road within the emerging new Local Plan, and Policy CH7 includes requirements which seek to maintain and encourage village centre uses in the area, protect existing retail premises, encourage temporary uses in vacant premises, and re-use historic buildings.

The requirement within part 2 of Policy CH7 for evidence of marketing to be provided to demonstrate that an existing use may not be viable within its current location is an approach which is consistent with the emerging draft Local Plan, and an approach commonly used within local plan and neighbourhood plan policies. Policy CH7 states that a 'full viability report' should be included within proposals relating to the loss of an existing retail premises. Further information should be provided in the supporting text to Policy CH7 on the 'full viability report' to assist future applicants and decision makers in understanding the requirements of the Policy. It is therefore recommended that the supporting text outlines what should be included within a 'full viability report'.

Part 3 of the Policy refers to change of use covered by permitted development. It is therefore recommended that part 3 refers to permitted development rights for clarity.

Part 4 of the Policy relates to the re-use of historic buildings to support the vitality and viability of the village centre. The Plan should be read as a whole, and there is therefore no need to repeat similar policy requirements within multiple policies. Policy requirements associated with development proposals affecting heritage assets are presented within Policy CH6. It is therefore recommended that part 4 of Policy CH7 is removed, as it includes unnecessary repetition of the requirements of Policy CH6.

### **Policy CH8: Strategic and Locally Important Employment Sites**

Policy CH8 seeks to protect and enhance employment uses in the Parish, through the allocation of 3 existing sites as strategic and locally important employment sites. The allocated sites, policy approach, and policy wording used within Policy CH8 is consistent with the emerging new Local Plan Policies ER2 and ER3.

While the repetition of Local Plan policies within a Neighbourhood Plan should be discouraged, it is acknowledged that it is possible that the Neighbourhood Plan may come forward ahead of the emerging Neighbourhood Plan, and this is a locally specific policy which would not be sufficiently addressed through national planning policy. In this instance it is therefore accepted that there is likely to be some repetition between emerging new Local Plan policies and the Neighbourhood Plan policies. In addition, it should be noted that the new Local Plan remains in production, and proposals it contains are subject to change. It is therefore recommended that the content of the Neighbourhood Plan, particularly relating to proposals within the emerging new Local Plan, is checked and carefully considered in collaboration with the Borough Council prior to the submission of the Neighbourhood Plan to the Council for consultation and examination.

Policy CH8 conforms with emerging and adopted local planning policy, and is therefore considered appropriate as a policy to be included within the Neighbourhood Plan.

#### **Policy CH9: Supporting flexible workspaces and opportunities for homeworking**

Policy CH9 seeks to support and encourage opportunities for homeworking in the area. The Policy is addressing an issue which has had increased importance since working habits have changed following the Covid-19 pandemic. Policy CH9 conforms with emerging and adopted local planning policy.

The support for homeworking in part 1) b of Policy CH9 is acknowledged. It is noted however that any extensions and garden offices may have an impact on the Green Belt. It is therefore recommended that part 1) b makes reference to compliance with national Green Belt policy, by stating 'enabling extensions and garden offices to facilitate homeworking in compliance with Green Belt policy where relevant'.

### **Chapter 7. ENVIRONMENT AND GREEN SPACE**

#### **Policy CH10: Green and blue infrastructure and delivering biodiversity net gain**

Policy CH10 seeks to maintain and enhance the natural environment, and deliver biodiversity net gain, supporting development proposals to protect the rural character and environmental assets of Chobham. Supporting text to Policy CH10 demonstrates a clear understanding of designated features in Chobham, and sets out important undesignated natural features valued by the local community.

Policy CH10 requires a minimum 20% biodiversity net gain from new development, in accordance with emerging Local Plan Policy E3: Biodiversity Net Gain. While the repetition of Local Plan policies within a Neighbourhood Plan should be discouraged, it is acknowledged that it is possible that the Neighbourhood Plan may come forward ahead of the emerging Neighbourhood Plan. In this instance it is therefore accepted that there is likely to be some repetition between emerging new Local Plan policies and the Neighbourhood Plan policies.

Policies should be unambiguous and positively worded. Part 2a) requires that there be no unacceptable loss or damage to existing trees or woodland from new development. It is unclear what would be considered unacceptable, and where relevant to trees that are not part of ancient woodland or preservation orders, the Policy requirement could be difficult to manage and deliver in practice. NPPF paragraph 186 c) only supports the loss of ancient woodland and ancient or veteran trees if there are 'wholly exceptional reasons'. To improve clarity for users of the Policy and to have regard to the NPPF, it is therefore recommended that part 2a) is rewritten as follows: 'a) Where possible, development proposals should seek to retain and avoid damage to existing trees. Ancient woodland and ancient or veteran trees must not be lost or deteriorated unless there are wholly exceptional reasons and a suitable compensation strategy exists.'

Policy CH10 refers to Biodiversity Opportunity Areas (BOA), which are also referenced in supporting text paragraph 7.16. However, it is unclear what specific sites the BOA refers to. The Neighbourhood Plan should be capable of being read and understood as a standalone document, and should therefore contain

sufficient background information to support users' understanding of the Policy. Supporting text should provide clear background information and evidence, and policies should signpost to relevant sections of the Neighbourhood Plan when necessary. It is therefore recommended that supporting text to Policy CH10 should clearly explain what Biodiversity Opportunity Areas are and where they are located, and part 4 of Policy CH10 should signpost to the relevant section on BOAs in the supporting text (these are the Bourne River corridor and Chobham South Heaths – they should be added to Figure 16).

Surrey County Council is producing a Local Nature Recovery Strategy (LNRS). The Biodiversity Opportunity Areas Policy Statements, as published by Surrey Nature Partnership, are anticipated to be superseded by content in the LNRS. It is therefore suggested that Part 4 is reworded to refer to the emerging LNRS.

To strengthen Policy CH10, it is recommended that part d refers to the justified removal of hedgerows as follows: Development that would result in the loss of, or the deterioration in the quality of, hedgerows will not be supported with the exception of the *justified* removal for vehicular access.

The Council is preparing a suite of evidence to justify the emerging Local Plan requirement of 20% biodiversity net gain. It should be noted that if the Chobham Neighbourhood Plan is examined ahead of the adoption of the emerging Local Plan, then more evidence may be required to justify the 20% BNG requirement in Policy CH10. In part 3, clarification on how “a measurable environmental net gain” can be measured and what factors would need to be taken into consideration in such an assessment would be required.

In summary, the following amendments are recommended to Policy CH10:

**POLICY CH10: GREEN AND BLUE INFRASTRUCTURE AND DELIVERING BIODIVERSITY NET GAIN**

**1) Development proposals should maintain or enhance the natural environment, landscape features and the rural character and setting of the neighbourhood area. Where possible, development proposals should seek to incorporate natural features typical of the parish, for instance ponds and streams, wildflower verges, trees and woodland and hedgerows.**

**2) As appropriate to their scale, nature and location, development proposals should demonstrate that they have addressed the following matters:**

**Trees and woodland:**

**a) Where possible, development proposals should seek to retain and avoid damage to existing trees. Ancient woodland and ancient or veteran trees must not be lost or deteriorated unless there are wholly exceptional reasons and a suitable compensation strategy exists. There is no unacceptable loss of, or damage to, existing trees or woodlands during or as a result of development. Ancient woodland and ancient or veteran trees must not be removed except in exceptional circumstances and in that case, they should be replaced with trees of a similar potential size and native species elsewhere on the site, unless this is clearly not possible.**

**b) Where trees and/or shrubs are replaced with new plantings, native or locally appropriate varieties attractive to insects, birds and other wildlife must be used.**

**c) The planting of additional native species trees and/ or continuous hedgerows to provide wildlife corridors and to offset the effects of air pollution and to provide cooling and shelter for people as well as a habitat for wildlife will be supported.**

### **Hedgerows**

**d) Development that would result in the loss of, or the deterioration in the quality of, hedgerows will not be supported with the exception of the justified removal for vehicular access; in this case, the access should include trees at either end of the retained hedgerow to aid wildlife to cross overhead from crown to crown.**

### **Fauna:**

**e) The provision of hedgehog holes in new residential fencing will be supported.**

**f) Development proposals which provide bird and bat nesting boxes will be supported.**

**g) The provision of a communal pond and wildlife friendly communal 'green spaces' within new major developments will be supported.**

**3) Proposals should be designed to create, conserve, enhance and manage green spaces and connect chains of green infrastructure, where relevant linking up to the natural green spaces and river corridors as identified on Figure 16, with the aim of delivering a measurable net environmental benefit (where net gain involves a post development increase in biodiversity units of a minimum of 20%) for local people and wildlife.**

**4) Proposals that seek to improve the connectivity between wildlife areas and green spaces will be encouraged to enhance the green infrastructure of the Neighbourhood area. Proposals that support the enhancement and management of the identified areas in the LNRS or the identified Biodiversity Opportunity areas will be supported. Conversely, proposals which threaten to damage such connectivity will be strongly resisted.**

### **Policy CH11: Local Green Spaces**

Policy CH11 designates 15 Local Green Spaces in the area in accordance with national policy. Appendix D demonstrates that the sites have been assessed against the NPPF requirements in paragraph 106. The Local Green Spaces are clearly mapped in Figure 19.

The Local Green Spaces identified within Policy CH11 include five sites identified as Green Spaces in the emerging Local Plan and 14 sites which will remain in the Green Belt following the adoption of Green Belt boundary amendments proposed in the emerging Local Plan. The Green Belt can afford the same level of protection as the Local Green Space designation and accordingly the policy is not therefore essential for the protection of 14 of the 15 identified sites. It is therefore recommended that Policy CH11 is reconsidered to take into account that where Local Plan Green Belt policy applies, the designation of a Local Green Space is not necessary.

Policy CH11 refers to national planning policy for Green Belt. The Plan should not unnecessarily repeat national policy. It is therefore suggested that the reference to national policy is removed from Policy CH11, this could instead be referenced within supporting text if considered necessary.

The Neighbourhood Plan should refer to the December 2023 version of the NPPF throughout the Plan. One example where the previous version of the NPPF is referenced is in supporting text paragraph 7.32. It is therefore recommended that paragraph 7.32 refers to paragraph 106 of the December 2023 NPPF, instead of paragraph 102. It is also recommended that all references to the NPPF are checked to ensure they are up to date.

## **Policy CH12: Locally significant views**

Policy CH12 seeks to protect eight locally significant views identified through community engagement and the Chobham Conservation Area Character Appraisal. Appendix E provides a description, photos and details of the significance of the identified views. The locally significant views are mapped in Figures 20 and 21.

The Neighbourhood Plan has sought to add locally specific protection beyond the adopted and emerging Local Plan policies by identifying locally significant views. The Policy generally conforms with emerging and adopted local planning policy, and is therefore considered appropriate as a policy to be included within the Neighbourhood Plan.

As written, the Policy does not explicitly state that development proposals are required to demonstrate that the locally significant views have been taken into account. To strengthen Policy CH12 and to help decision makers in assessing future planning applications, it is therefore recommended that Policy CH12 is rephrased to require that development proposals should demonstrate how they are designed to take into consideration the importance of locally significant views.

## **Policy CH13: Dark skies**

Policy CH13 seeks to regulate and limit light pollution from new development. Supporting text to the Policy set outs the impact of light pollution on the natural and built environment. The Policy refers to guidance produced by the Institution of Lighting Professionals Guidance Note GN01 for detailed policy requirements. The Neighbourhood Plan has sought to add locally specific protection beyond the adopted and emerging Local Plan policies. The Policy generally conforms with emerging and adopted local planning policy, and is therefore considered appropriate as a policy to be included within the Neighbourhood Plan.

Policies should be clear and unambiguous. As presented, the Policy is hard to read and understand. It is therefore recommended that the policy requirements in Policy CH13 are more clearly presented to assist decision makers in assessing planning applications.

In summary, the following amendments are recommended to Policy CH13:

### **POLICY CH13: DARK SKIES**

**1 Proposals for development will be supported where it is demonstrated that, if external lighting is required, it protects the night sky from light pollution, where:**

- a) the lighting is necessary for operational, safety or security reasons;**
- b) any light spillage beyond the application site is eliminated, or reduced by measures such as timing and proximity controls, orientation, screening, shielding or glazing;**
- c) impact on nearby residential properties, wildlife, local heritage assets or the wider landscape is minimised; and**

**2 Proposals should adhere to the guidance on lighting provided in the Institution of Lighting Professionals (ILP) Guidance Note GN01: The Reduction of Obtrusive Light (and any subsequent revisions) and should consider carefully, and provide details of:**

- d) the light source and intensity being used;**
- e) the luminaire design, height, and angle, adding baffles and cut-off shields where required;**
- f) details of control mechanisms to dim or switch off lighting schemes when not required.**

**3 Where appropriate, lights should be controlled by passive infrared detectors**



## **Chapter 8. TRANSPORT AND MOVEMENT**

### **Policy CH14: Improving walking, cycling and equestrian opportunities**

Policy CH14 seeks to enhance walking, cycling and equestrian opportunities along routes which are most likely to encourage a shift away from the private car, particularly for short journeys in and around Chobham.

The term 'particularly supported' is unclear, as proposals within planning are either supported or not. It is recommended that part 2 of Policy 14 is amended to remove the word 'strongly'. Aside from this minor amendment, Policy CH14 conforms with emerging and adopted local planning policy, and is considered appropriate as a policy to be included within the Neighbourhood Plan.

The Surrey Heath Local Cycling and Walking Infrastructure Plan was endorsed by the Borough Council in March 2024 and the Parish may wish to consider referencing this in more detail including for example the identification of Chobham village as a priority core walking zone.

### **Policy CH15: New residential development parking space standards and design**

Policy CH15 seeks to ensure that adequate off-road parking is provided within new residential developments, with appropriate dimensions suitable for modern vehicles. The supporting text provides helpful background information on existing guidance produced by Surrey County Council and recent alternative guidance included within the made Windlesham Parish Neighbourhood Plan.

The supporting text presents justification for the parking standards proposed within the Policy, and the approach generally to proposing alternative standards. While it is acknowledged that alternative standards have been included within the Windlesham Neighbourhood Plan, the Borough Council are concerned that alternative standards may not be appropriate for the area and could be difficult for decision makers to implement. It is therefore the Borough Council's preference that the Neighbourhood Plan reflects the parking standards in Surrey County Council's Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (2021), rather than seeking to develop alternative standards for the local area. It is recommended that this approach is further reviewed with the County Council as the Highways Authority and authors of the 2021 County wide parking standards. If setting local standards, the Parish Council will need to ensure that they have taken into account the factors in paragraph 107 of the NPPF 2023 into account.

## **Chapter 9. COMMUNITY FACILITIES**

### **Policy CH16: Providing a range of community facilities**

Policy CH16 seeks to protect and enhance the provision of community facilities within the Parish. Part 1 of the Policy outlines support for new community facilities. Policy requirements 1a-d are included to manage any impacts of proposals on the Green Belt, residential amenity, the road network, and heritage assets. The Plan should be read as a whole, and these requirements do unnecessarily repeat requirements from other policies in the Plan. It is therefore recommended that requirement 1a-d could be removed from the Policy text.

Part 3 of Policy CH16 requires proposals that result in the loss of a facility to demonstrate there is no longer a need for such a facility. To assist future applicants and decision makers, it is recommended that the supporting text clearly outlines how proposals should evidence that there is no longer a need for such a facility.

I draw your attention to the concerns raised by emails sent to the Council relating to the accessibility of the pre-submission consultation plan by all users and the accessibility of contact details for all respondents. We are raising accessibility concerns at this stage because at the next (Regulation 16) stage the document will need to be fully accessible to be published on this Council's web-site to ensure we are meeting the requirements of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. This Council would need to take forward consultations at future stages and there is some concern that access may not be possible with respondents who have provided anonymous representations or whereby you are unable to pass on contact details. For those respondents, this Council would be unable to notify them at the Regulation 16 stage.

The Council would request that the comments provided are taken into consideration upon the review of this Plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alan Ashbery', with a stylized flourish at the end.

**Cllr Alan Ashbery**

Homes, Planning and Enforcement Portfolio Holder