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Sent by email to:
neighbourhoodplanning@surreyheath.gov.uk

4th September 2025

Dear Sir or Madam,

Chobham Neighbourhood Plan Submission Version Consultation

Thank you for consulting Surrey County Council (SCC) on the draft Chobham Neighbourhood Plan. We have provided officer comments below relating to the council's roles and responsibilities as the Lead Local Flood Authority, Minerals and Waste Planning Authority and from our ecology, historic environment and transport development planning teams.

Our key concern is the proposal to designate Wishmore Cross Academy field and Playing Field west of High Street as Local Green Spaces. Education land is fully protected under statute and is not open space that is fully accessible to the public. SCC therefore object to the proposals to designate these two sites as Local Green Space. Further details are provided below.

Local Planning Policy

In our Regulation 14 response we commented that five SCC Development Plan Documents should be included in the Development Plan list for Surrey Heath. We are pleased to see that the Surrey Waste Local Plan 2019 (December 2020) and Surrey Minerals Plan Core Strategy 2011 (July 2011) have been included in the list.

Paragraph 1.8 should list all the correct documents. Please could the following documents be added:

- **Surrey Primary Aggregates Development Plan Document 2011 (July 2011)**
- **Surrey Minerals Site Restoration Supplementary Planning Document 2011 (July 2011)**
- **Surrey Aggregates Recycling Joint Development Plan Document 2013 (February 2013)**

Heritage

Figures 9 and 10 show the heritage assets referred to in the text. 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. For example, the environmentally-sensitive prehistoric site at Langshott Bog was upgraded from an Area of High Archaeological Potential to a County Site of Archaeological Importance, in 2023. The Mizens Farm AHAP was extended then as well.

Flood Risk

The National Planning Policy Framework was updated in December 2025 and the government has removed the limitation for SuDS to only be considered on 'Major Development' and SuDS should now be considered by all development proportionate to the scale and nature of the scheme (Paragraph 182). This recognises the cumulative impact multiple smaller developments can have on surface water flood risk.

Policy CH5 Part 3 states that *'All development proposals are encouraged to incorporate Sustainable Drainage Systems'*. We recommend updating this to: **Sustainable Drainage Systems (SuDS) should be incorporated into all new development proportionate to the scale and nature of the proposals** (or similar wording). We recommend removing 'where possible' from the second sentence: *'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.'*
Remove extra ':' at the end of Policy CH5 Part 3.

Policy CH5 Part 4 add: *'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 **and written confirmation has been provided from the sewerage undertaker confirming capacity is available with no detrimental impacts.***' (or similar wording).

Policy CH5 add a part 5 which ensures applicants have considered existing watercourses and made space for them within the development design.

Existing watercourses should remain open and not be culverted, except where essential for access purposes, in which case appropriate consent must be obtained. Site layouts should be designed to ensure maintenance access to all watercourses is available within publicly accessible areas, with opportunities taken where practicable to enhance the existing environment and reduce flood risk.

Paragraph 5.33 remove first sentence: ~~'SCC being the Lead Local Flood Authority (LLFA).'~~

Paragraph 5.41 add link to Ordinary Watercourse Consent web page [Ordinary watercourse consents - Surrey County Council](#)

Ecology

The Surrey Local Nature Recovery Strategy (LNRS) is now available for public consultation, and it can be viewed via:

[Have Your Say Today - Local Nature Recovery Strategy Public Consultation - Local Nature Recovery Strategy](#)

We recommend that policy CH10 part 2 is updated using the following text which includes LNRS statutory guidance:

'Where Biodiversity Net Gain (BNG) units cannot be delivered on-site, off-site delivery should be prioritised within the parish—focusing on areas identified in the Local Nature Recovery Strategy (LNRS). Measures should align with the ecological priorities of those

areas. Where actions correlate with mapped measures in the LNRS, they will receive a strategic significance uplift in the unit calculations, as set out in the statutory guidance. If delivery within the parish is not possible, other suitable locations within, or as close as reasonably possible to, the local planning authority area should be considered. In all cases, applicants must clearly justify how their proposals follow the BNG hierarchy and demonstrate that all efforts to deliver habitat locally were fully explored before other options were sought. Statutory biodiversity credits should only be used as a last resort, in accordance with national policy.'

Local Green Spaces

We note that policy CH11 proposes to designate Wishmore Cross Academy field and Playing Field west of High Street as Local Green Spaces.

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.

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.

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. Clearly playing fields should be protected from loss to development, however *'Local Planning Authorities should take a proactive, positive and collaborative approach'* 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, *'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.'*

Transport

Paragraph 8.12 should be updated as the new Rights of Way Improvement Plan has now been published, and the link has changed. We would suggest the following text is included:

'8.12 The Rights of Way Improvement Plan runs from 2025-35. Developers should refer to this plan as part of their proposals.'

We are aware that there is now a national requirement under Building Regulations for all new residential properties to be provided with EV charging points. However, there are differences between building regulation requirements and the County Council's requirements, particularly in terms of our requirement for 'fast' charging points.

Therefore, we would recommend that policy CH15 include a requirement for EV charging points within all new residential developments, in accordance with SCC's Parking Guidance (pages 12-17), as this will ensure that fast charging points are implemented and there are higher active charging points in non-residential sites.

I hope these comments are helpful. If you require further information, please contact Nikki Nicholson at [REDACTED].

Yours sincerely,

A large black rectangular box redacting the signature of Nikki Nicholson.

Nikki Nicholson
Principal Planning Officer
Surrey County Council