



Comments on the Submission Consultation (Regulation 16) Chobham Neighbourhood Plan

22 August 2025

We welcome the opportunity to comment on the Submission Chobham Neighbourhood Plan 2024 to 2038 which is currently at Regulation 16 stage of the Neighbourhood Development Planning Regulations 2012 (as amended).

The representations made below have been agreed with Alan Ashbery, portfolio holder for Built Environment and Regulation at Surrey Heath Borough Council, as the lead member for Planning services.

We welcome amendments to the plan which have been made in response to the Council's previous comments at Regulation 14 stage.

It is noted that at the time of the Pre-Submission Consultation (Regulation 14) on the Neighbourhood Plan, the emerging Local Plan had not reached Pre-Submission publication (Regulation 19) and therefore the Council's comments made on 18th June 2024, were made on the basis of the published Regulation 18 Local Plan. The Regulation 19 Local Plan was published on 5th August 2024 and has therefore been available to the Parish in preparing the submitted Neighbourhood Plan. Appendix 3 of the Pre-Submission Neighbourhood Plan sets out the strategic policies for the purposes of neighbourhood planning.

There are various aspects of the Chobham Neighbourhood Plan which are affected by revisions to the Local Plan; these constitute many, but not all, of the matters raised below.

Comments on Chobham Neighbourhood Plan Submission Version

The following section provides planning related comments on each section of the Regulation 16 Chobham Neighbourhood Plan. The comments are set out in order of the Plan.

Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
Community Engagement	Para 1.19	Final sentence and Table 1 – For clarity for future users we suggest this is updated to reflect the current stage of the NP in the ‘made’ version of the Neighbourhood Plan.
Sustainability and Responding to Climate Change	Para 1.31	The wording does not reflect the current stage of the Plan and could be updated for the ‘made’ version. Suggest amending to “A copy of the Screening Determination Statement is available on the....”
About Chobham	Para 2.7	Suggest amendment to refer to the naming of sites in line with Regulation 19 Local Plan i.e. -Highams Park (former British Oxygen Company site) -Longcross Studios (former Defence Evaluation and Research Agency site) Also note that Fair Oaks Airport is a Strategic Employment Site in the Regulation 19 Local Plan, not a ‘Locally Important’ Employment site.
About Chobham	Para 2.14	Out of date reference to Reg 18 Local Plan. Update to “Pre-Submission Local Plan”, or possibly the adopted Local Plan, depending on timescales for the CNP “made” version for referendum.
Policy CHI: Location of development	CHI(1)	Criterion 1 – add ‘or as shown by superseded by the Surrey Heath Local Plan 2019 - 2038’ Reason – to provide clarity that there will be only one defined settlement boundary.

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Policy CHI: Location of development	CHI(2)	<p>The policy is currently somewhat unclear as to whether just one, all, or some combination of criterion must be met.</p> <p>In order to provide clarity to applicants in line with para 16 of the NPPF, 2024 we suggest that a, b, c and e are 'ors' and d, f and g are 'ands'. Therefore criterion 2(d) should be moved underneath 'Such development should:' and wording adapted slightly e.g. "be capable of..'</p>
Policy CHI: Location of development	Figures 3, 4 and 5	<p>The Chobham revised Settlement Boundary, as set out in Regulation 19 Local Plan Mapping booklet (Examination Library reference CD3) is not reflected on the dotted red line on Figures 3 and 4, or the blue line on Figure 5 of the CNP.</p> <p>Suggest that Figures 3, 4 and 5 are updated and consistent symbology is shown for the proposed (Regulation 19) settlement boundary, across the three maps.</p>
Policy CH2: Meeting Local Housing Needs	CH2(1)(a)	<p>We welcome the increased proportion of social rent from 30% to 40% in the submitted version that is more in line with the Local Plan requirements.</p>

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Policy CH2: Meeting Local Housing Needs	CH2(1)(b)	<p>The Council notes reference to a preference for a 50% discount for any First Homes element of housing. However, it is not clear whether this has been viability tested along with the requirement for the 40:60 social rent and affordable housing split.</p> <p>Suggest amendment to “particularly supported” to delete reference to ‘particularly’ as planning applications are either supported or not and the wording is currently not clear to applicants.</p> <p>As set out in our Reg14 comments, national policy already requires a minimum 30% discount on First Homes and there is therefore no need to repeat this in Policy under criterion 1b.</p> <p>The final sentence of 1b is also considered to be unclear. It follows discussion on First Homes but the link in the Glossary relates to the Council’s allocations for other forms of affordable housing and does not cover First Homes. These are not allocated by the Council in the same way as other affordable housing but applicants must meet a set of eligibility criteria.</p>
Policy CH2: Meeting Local Housing Needs	Para 4.14	<p>Out of date reference to Reg 18 Local Plan.</p> <p>Amend as follows: Draft Policy H5 (Range and mix of housing) of the Regulation 18 <u>19</u> Local Plan suggests that....</p>
Policy CH2: Meeting Local Housing Needs	Para 4.13, 4.22 and 4.23	<p>Query whether the correct acronym has been used as there is discrepancy between paras 4.13 and 4.22/23. The current document title is Surrey Heath Local Housing Needs Assessment (SHLHNA) which is document HO2 in the Local Plan evidence base.</p>

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Policy CH2: Meeting Local Housing Needs	Para 4.25	Out of date reference to Reg 18 Local Plan. Furthermore, the text contains specific details referring to requirements of emerging Local Plan policy H5; the requirements for the different types of levels of accessibility under Building Regulations Part M4 (3) have changed between the Regulation 18 and the Regulation 19 Local Plan and therefore this should be updated in the CNP.
Policy CH3: Character of development	CH3(4)(a)	<p>Weblink to Chobham Conservation Character Appraisal is missing. The weblink is (https://www.surreyheath.gov.uk/sites/default/files/2023-05/Chobham%20Village%20Conservation%20Area.pdf)</p> <p>The Council notes that criterion 3 of this Policy references the need to respect valued views but that the views within the Chobham Village Conservation Area Character Appraisal differ from those included within the Neighbourhood Plan in Policy CH12. Further clarity on 'valued views' would be beneficial to applicants.</p>
Policy CH4: Energy efficiency and design	CH4(2)	<p>A Viability clause has been added into policy in Criterion 2 which is welcome, but it has been stated in the opposite way. Suggest amendment: "where financially unviable"</p> <p>It may be helpful to refer to Surrey Net Zero Carbon Toolkit, as published on https://www.epsom-ewell.gov.uk/submissiondocuments (See 'Other Supporting Documents' section)</p>
Policy CH5: Minimising the risk of flooding	CH5(2)	This criterion requires that there is sufficient capacity in the local sewerage system at the point of determining the application. This to some extent conflicts in relation to the acceptability of phasing, with Regulation 19 Local Plan policy IN1 criterion (3)(a)(vii) and IN1(3)(b). The Local Plan as well as recent permissions and appeals, takes the approach that infrastructure phasing can be agreed via a Grampion condition or a legal agreement. Main Modification MM6.1 is relevant.

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Policy CH5: Minimising the risk of flooding	CH5(3)	Note that a main modification (MM7.14 in document reference CD13) is proposed to the Regulation 19 Local Plan to set out a drainage hierarchy for surface water discharge. The proposed main modification is broadly aligned to the CNP drainage hierarchy, but the Local Plan modification proposes a more specific hierarchy for the soakaway category.
Policy CH5: Minimising the risk of flooding	Para 5.35	Link to the Surrey Heath Flood Risk Assessment is not working. The correct link is to the Flooding section on the Local Plan evidence base . This includes the 2025 update to the Strategic Flood Risk Assessment. The assessment should be named in full i.e. Surrey Heath Strategic Flood Risk Assessment (SHSFRA)
Policy CH5: Minimising the risk of flooding	Figure 13 (and Figure 14)	Figure 13 map is sourced from the Environment Agency (EA) Flood Map for Planning and was accessed in April 2023. Since this date the EA has updated national flood risk mapping (NaFRA2, 2025) and therefore we suggest the extracted map may need to be updated. Figure 14 map is not dated, but the same point may apply.
Policy CH6: Conserving heritage assets	CH6(3)	Suggested amendment: "...determined based on national planning policy <u>and in accordance with the Development Plan</u> ",
Policy CH6: Conserving heritage assets	Para 5.62	Emmetts Mill Bridge is mentioned as an example of a site that was put forward by the community for inclusion on the Local List, but in fact the opposite is true. It is currently on the Local List, but during a consultation to update the Local List, the Council received comments from Chobham Parish Council and the wider Chobham community to say that the structure is no longer suitable for including on the local list. The updated local list is awaiting publication at the time of writing. Suggestion to delete the bridge from the examples of sites to be included, along with removal of the image in Figure 15.

Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
Policy CH7: Chobham Village Centre	CH7(2)(d)	<p>The policy refers to the wrong appendix – should be reference to Appendix D.</p> <p>The policy criterion subheading is ‘Existing retail premises’, but then the further text refers to use classes beyond retail classes i.e. reference to Class E uses which include various Employment use classes.</p> <p>The type of report evidence required under Appendix D is a “marketing report” (including evidence of a marketing campaign having been carried out), not a viability report.</p> <p>Appendix D includes text which is unclear in terms of whether it relates to retail and/or employment – see comments on Appendix D.</p>
Policy CH7: Chobham Village Centre	CH7(4)	<p>There is potential inconsistency between this criterion and Policy CH6(4). Policy criterion CH6(4) requires alterations to <u>contribute to the enhancement of the historic environment</u>, whereas in CH7(4) alterations to historic buildings (only) need to be <u>sympathetic to the historic and architectural significance and character of the building</u>.</p>

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Policy CH8: Supporting Local Employment Opportunities	CH8(4) and (5) and para 6.19 and Figure 18	<p>The Regulation 19 Local Plan defines all three employment sites in the parish as Strategic Employment sites, which are given the highest level of protection against the loss of existing employment uses. There are no sites proposed as Locally Important Employment sites.</p> <p>The Regulation 19 Local Plan proposes boundary amendments to all three sites, some considerable e.g. at Highams Park.</p> <p>In order to be in general conformity with the emerging policies in the Development Plan the following amendments are suggested:</p> <ul style="list-style-type: none"> • Add Highams park as third Strategic Employment site in CH8(1). • Delete clauses 4 and 5 of policy CH8, as these refer to Locally Important Employment Sites, which there are none of in the NP area. • Amend para 6.17 to include Highams Park. • Delete para 6.19 • Amend Figure 18 (Highams Park on map) to be a Strategic Employment Sites • Update the boundaries for all three sites, to align with the Regulation 19 Local Plan.
Policy CH10: Green and blue infrastructure and delivering biodiversity net gain	CH10(2)	<p>The policy has been amended since the Regulation 14 consultation and now requires that where a development must provide offsite Biodiversity Units, that a location within the Parish should be prioritised above further locations.</p> <p>The Council is concerned that this is an unreasonable expectation; there are complex requirements involved in offsite Biodiversity Gain site monitoring and as such there are advantages to a smaller number of more strategic scale 'habitat bank' sites.</p>

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Policy CHI0: Green and blue infrastructure and delivering biodiversity net gain	CHI0(5)(a)	<p>The Policy refers to ‘notable and veteran trees’ and sets out the approach to replacement tree planting as compensation for their loss. However, Veteran trees are irreplaceable habitats (para 193, NPPF 2024) and as such, the NPPF requires that ‘a suitable compensation strategy exists’ in relation to any proposed loss. This would be likely to involve detailed site-specific considerations which cannot be prescribed in a general policy. We are concerned that the policy is not consistent with the NPPF and PPG.</p> <p>We suggest that CHI0(5)(a) is amended to be in line with NPPF para 193 and Natural Environment PPG (Paragraph: 034 Reference ID: 8-034-20190721).</p>
Policy CHI0: Green and blue infrastructure and delivering biodiversity net gain	CHI0(5)(a)	<p>The requirement for the retention of all hedgerows, irrespective of their quality (biodiversity distinctiveness) could be difficult to justify. For clarity, the Policy would benefit from either identifying that hedgerows of amenity or other value (in line with Pre-Submission Local Plan Policy DH5) should be retained, and/or setting out the mitigation required if harm is unavoidable.</p>
Policy CHI1: Local Green Space	CHI1 in general	<p>The Council notes that the CHP’s ‘Local Green Space’ designation is different to the ‘Green Space’ sites which are covered by Local Plan policy IN6.</p> <p>Notwithstanding this point, and representations that have been made on the Chobham Neighbourhood Plan by the Chobham Poor Allotments Charity, it may be relevant to be aware that the Council received feedback to the Regulation 19 Local Plan from Chobham Poor Allotments Charity, as the site owner of Broom Lane Allotment which advised that some parts of the site are private gardens i.e. have no public access.</p>
Policy CHI1: Local Green Space	Para 7.37	<p>‘Field near Station Road’ is included in para 7.37, which is inconsistent with the map at Fig 21 and Appendix E. This should be amended for consistency.</p>

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Policy CHI4: Improving Walking, cycling and equestrian opportunities	CHI4(2)	As stated in our response to Regulation 14 consultation, we suggest that the word 'strongly' (in relation to support for applications) should be deleted.
Policy CHI4: Improving Walking, cycling and equestrian opportunities	CHI4(2)	There is a policy requirement for new or enhanced cycling and walking routes to be of permeable materials, however this may not be appropriate for all locations.
Policy CHI4: Improving Walking, cycling and equestrian opportunities	CHI4(2)	<p>Policy criterion CHI4(2) focuses on the creation and/or enhancement of cycling and pedestrian routes "as shown in Figure 26", but Figure 26 is a Google map titled 'Cycling distances in Chobham' and shows a possible way to cycle between Red Lion Rd and Benhams Corner. It appears Figure 26 is included to provide support to the statement in para 8.6 that Chobham is a highly walkable and cyclable village, in particular in relation to 20mins journey times. As such Figure 26 seems an inappropriate map to refer to in the context of policy criterion CHI4(2).</p> <p>The Council suggests that Figure 28 and/or the relevant maps in the Surrey Heath Local Cycling and Walking Infrastructure Plan, would be more relevant to refer to.</p>
Policy CHI4: Improving Walking, cycling and equestrian opportunities	8.13	The Surrey Heath Local Cycling and Walking Infrastructure Plan has been published. Therefore we suggest updating the text references and providing a link .

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Policy CH15: New residential development parking space standards and design		<p>As set out in our response to the Regulation 14 CNP, the Council is concerned by the proposed higher parking standard for the parish, compared to the requirements of the Surrey Parking Standards, as applied by Surrey Heath BC. When setting local standards, these should take into account paragraphs 108 and 111 of the NPPF 2024. Requiring a greater number of parking spaces for larger e.g. 4 bed dwellings would not make the most efficient use of land or encourage more active and sustainable modes of transport.</p> <p>There is also a degree of conflict between the high minimum parking standards of Policy CH15 and Policy CH14(1) which refers to the Healthy Streets for Surrey guidance. In regards to parking, the Healthy Streets guidance states that for curtilage parking for detached, semi-detached and end of terraced homes “to avoid the creation of a car dominated streetscape curtilage parking should be positioned to the side of homes, not the front” (Figure 10.4) and furthermore, that additional (2/3rd) parking spaces could be provided as peripheral parking. The Council is concerned that the high minimum parking standards will lead to a car dominated landscape.</p>
Chapter 12: Policies maps	-	<p>Highams Park (former British Oxygen Company site) is shown as a Locally Important Employment site, but to be consistent with Regulation 19 Local Plan, it should be changed to a Strategic Employment site.</p> <p>The proposed settlement boundary for the Local Plan should be amended to align with the Regulation 19 version.</p>
Chapter 14: List of evidence documents	-	<p>Many documents listed have been superseded. The Council will be glad to liaise with the Parish Council to update these references, at an appropriate time in the examination process.</p>

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Appendix D: Demonstrating Viability	-	Having regard to the content of this appendix we would suggest it outlines the requirements for a Marketing report rather than a viability report. It is unclear whether the appendix relates to retail or employment uses. It would be helpful to clarify at the start which land uses and which policies this appendix applies to. We consider that the appendix is intended to support Policy CH7 Chobham Village Centre, in particular the consideration of loss of retail. If so, this should be made clear, with reference to the relevant policy criterion and corrections to the appendix text.
Appendix E: Local Green Spaces	-	The appendix includes a site which is no longer included in the related policy. Suggest removal of 'Field near Station Road', to align with Figure 21 in policy CH11 Local Green Space.
Appendix F: Locally Significant Views	-	There is a formatting error/typo with numbering starting at 15. Suggest change to numbering from 1 to 7, to align with Figure 22 (map) in policy CH12.