

Chobham Neighbourhood Development Plan

Responses to Independent Examiner's Clarification Note

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

17 October 2025

This response has been prepared by the Chobham Neighbourhood Plan Steering Group (SG) on behalf of Chobham Parish Council (CPC) in relation to the Chobham Neighbourhood Plan (CNP). We are grateful for the opportunity to provide further clarification on the points raised below by the independent Examiner.

Questions for the Parish Council

The relationship between the emerging Local Plan and the Neighbourhood Plan

This matter is addressed in several of the private sector comments and by the Borough Council. To what extent has the Parish Council sought to ensure that the relationship between an emerging Local Plan and an emerging Neighbourhood Plan in Planning practice guidance (ID: 41-009-20190509) has been applied locally?

I note that paragraph 10.3 advises that the adoption of the new Local Plan may trigger a light-touch review of the Plan. How and when would this take place?

Whilst the NDP has to be in conformity with the adopted Local Plan, the SG have been mindful to ensure that the policies are in alignment with those contained in the emerging Local Plan. The emerging Local Plan had progressed to its Regulation 19 version and was submitted to the Secretary of State in for independent examination in public by a Planning Inspector on 10 December 2024. The SG waited until this had been achieved before finalising the Submission Version, after the Regulation 14 consultation, in order to be in a position to align the CNP policies as much as possible. The latest local development scheme sets out a timeline for the new Local Plan, with adoption scheduled for Autumn 2025. At the time of writing, this looks a little unlikely, as the hearings have only just been completed. The CPC does not consider that the hearings will materially impact the content of the CNP. The CNP is not allocating sites and the policies within the CNP are not considered to be contentious.

The CPC considers there are two options for completing the Plan. Either the examination could continue as planned and, if successful, the CPC progress to referendum as soon as possible. The advantage of this option is that the CNP would carry full weight at the earliest opportunity. Should the emerging Local Plan be adopted after the examination but before the referendum, references to the former adopted Local Plan could be removed. Should the emerging Local Plan be adopted post-referendum, the CNP could be modified at this point to remove former references. The second option would be to delay the examination until such a time as the emerging Local Plan is adopted. The exact timetable for this is unknown, which brings an element of risk to the CNP, as it would be delayed in going forward to referendum. The SG would be minded to following Option 1. The CNP has been many years in development, and we are keen to bring it into fruition.

Policy CH1

Plainly this is an important policy in the Plan. It provides a positive spatial strategy for the neighbourhood area and is designed to focus sustainable development within easy reach of its commercial and community facilities.

I note that part 2a of the policy comments about the Green Belt. Several representations comment about the reference to grey belt land in the NPPF. Did the Parish Council consider the matter and the potential to identify grey belt land as part of the preparation of the Plan? Is part 2e of the policy intended to provide longer-term flexibility on this matter?

The CNP does not allocate sites for development. It also did not undertake a review of the Green Belt, as there is no current strategic policy in the adopted Plan enabling them to remove areas from the Green Belt, for instance for development, as required by paragraph 145 of the NPPF.

The community were clear throughout the consultation in their desire to protect the Green Belt, which they consider to be a much-valued asset. Nevertheless, Green Belt sites can be released as part of any review undertaken, for example by the Local Authority. Clause A relates to this. Clearly the changes to national policy in December 2024 also allow for Grey Belt to be identified. The CNP has not sought to identify such areas, as this would be undertaken at the strategic level as part of any future Green Belt Review at the local authority level. Part 2e would allow flexibility for such an occasion; should grey belt sites be identified by the local authority, they would need to adhere to the 'Golden Rules' as set out in the NPPF, which the SG did not consider necessary to repeat in the policy.

The order of the elements of the policy does not have a natural flow. I am minded to recommend that the order of the policy becomes the first, third, fourth and the second parts (of the submitted Plan). Does the Parish Council have any comments on this proposition?

The SG would be supportive of this approach and agree that it would improve the flow of the policy.

I am minded to recommend that the third part of the policy should have a positive (what development proposals should provide) rather than negative (what should not arise from development) approach. Does the Parish Council have any comments on this proposition?

This part of the policy is seeking to restrict backland, and notably, garden development. The SG would be content to rephrase the wording into the positive, for instance: **"Proposals for development of backland sites, including residential garden land, will only not be supported where it would not result in harm/(or) contribute positively to the character and appearance of the local area.**

Policy CH2

The policy addresses local housing needs in a positive way.

This comment is noted.

Policy CH3

This is a locally-distinctive policy which is underpinned by the Design Guidance and Codes. In the round, it is a first-class local response to Section 12 of the NPPF.

This comment is noted.

There is an opportunity to comment on the representation from ADP Fair Oaks and Vistry Group later in this note.

See Appendix A for our comments on this.

Policy CH4

This is another excellent locally-distinctive policy. Its non-prescriptive approach has regard to Section 14 of NPPF and the Written Ministerial Statement of December 2023 on local energy efficiency standards.

In the second part of the policy should 'unviable' read 'viable'?

Yes, this is a typo, and the SG can confirm that the wording should be 'viable'.

Policy CH5

Section 3 of the policy seeks to encourage the incorporation of sustainable drainage systems. Should the approach be more explicit given that 'encouraged' has little weight in a development plan context?

The SG would be minded to strengthening this, by amending the word 'encouraged' to 'required', in line with national policy. We would also be content to include reference in the supporting text to Surrey County Council's (SCC) planning advice (<https://www.surreycc.gov.uk/community/emergency-planning-and-community-safety/flooding/strategy-policies-key-contacts/sustainable-drainage-systems-planning-advice>) noting that From 6 October 2025, all new planning application consultations will be assessed by SCC using the new national standards.

Policy CH6

I noted the significance of the built heritage of the neighbourhood a during the visit. Nevertheless, to what extent do the first, second and fourth parts of the policy bring any added value to relevant national and local planning policies?

The third part of the policy addresses non-designated heritage assets. Given the approach taken in paragraphs 5.62/5.63 and the policy wording does this part of the policy serve any practical purpose?

The original intention for the SG had been to identify non-designated heritage assets and include these explicitly within the policy. However, the work was somewhat overtaken by SHBC, who were in the process of updating their local list of heritage assets, hence the proposed NDHAs would already feature in that updated list. To that end, the SG are mindful

that the Parts 1, 2 and 3 of the policy could be seen to simply repeat national policy and could be removed.

Part 4 is considered helpful in that whilst a Conservation Area Appraisal does exist for the Chobham Conservation Area, it was produced in 2001 and much has changed since then in terms of national and local policy and guidance. The SG would be minded to retaining this clause as it does refer to the Design Guidance and Codes, which provide an updated approach to design generally in the parish, including with the Conservation Area.

Policy CH7

I looked carefully at the Village Centre and the Chertsey Road Neighbourhood Parade during the visit. Their importance to the local community was self-evident. The policy acknowledges the importance of economically vibrant mixed-use centres.

Plainly the Village Centre and the Chertsey Road Neighbourhood Parade have a different scale and significance. Is it appropriate that they are addressed by the same policy?

In the second part of the policy should the first criterion apply only to the Village Centre?

The SG understand the point being made. We would be minded to retaining the policy but perhaps focus it on Chobham Village Centre, with a clause at the end setting out which parts are also relevant to development proposals in the Chertsey Road Neighbourhood Parade, which would be Part 2, Part 3 (b and c) and Part 3.

Policy CH8

I note the origin and context to this policy in the supporting text.

Paragraphs 6.17 and 6.18 suggest that the policy has been included to safeguard the two proposed Strategic Employment Sites given that the emerging Local Plan has not yet been adopted. In this context, is the approach taken a strategic policy rather than a neighbourhood plan policy?

It would be helpful if the Parish Council comments on the detailed points raised in the Borough Council about the policy's accuracy?

The SG has spent some time debating this policy. It was considered important to include it in order to safeguard the few employment sites that exist in the Parish from potential redevelopment to an alternative use. This was felt important in particular in the absence of an up-to-date Local Plan and with the timeline for the emerging Local Plan appearing to be moving back. SHBC has suggested the following amendments to enable conformity:

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.

The SG would be content to make these changes.

Policy CH10

I note the approach taken in the first part of the policy. However, is there any local evidence or research to support a 20% requirement for biodiversity net gain?

The policy does not require a net gain of 20%, rather it would strongly support this. This aligns with the approach proposed in the emerging Local Plan, which sets out in para 6.30 that “a higher target of 20% is both necessary and deliverable in Surrey Heath. Evidence of ‘need’ is provided in the Surrey Nature Partnership’s report ‘The State of Surrey’s Nature’ (2017) which demonstrates that Surrey’s rate of biodiversity loss is even more severe than the national average and it is therefore justified to require a higher target to halt and reverse these historic losses. The basis for adopting 20% net gain across Surrey is set out in a paper by the Surrey Nature Partnership. Furthermore, the Council is developing a local habitat bank to provide offsite biodiversity units including on Council-owned land, in support of demonstrating the feasibility of providing offsite gains. The Local Plan Viability Assessment 2024 has demonstrated that 20% BNG requirement will not impact viability of delivery of housing sites.”

Once adopted, the Local Plan requirement will supersede this clause in the CNP, uplifting the strongly support statement to a requirement.

Policy CH11

I looked at a selection of the various Local Green Spaces (LGSs) during the visit. I note that the policy is underpinned by the details in Appendix E. This is best practice.

What is the size of LGS 2 (Chobham Water Meadows)?

The space is 22.3ha. This is an area of land that is very much valued by the community and is central to the village in its location. It is used for informal recreation including for dog walking, as a space that avoids dogs using the SSSI. There is no upper limit definition as to what constitutes ‘extensive’. We consider that it meets the Local Green Space criteria.

The policy simply lists the proposed LGSs without including policy wording. Was this approach deliberate?

The SG were minded not to repeat national policy on how local green spaces should be considered. However we would be minded to include the following text to the end of the policy to aid interpretation: **“Development proposals within the identified Local Green Spaces will not be supported except in very special circumstances”**.

There is an opportunity to comment on the representation from the Chobham Poor Allotment Society.

The Chobham Poor Allotment Society own two of the proposed Local Green spaces: Broom Lane Site and Red Lion Road Site.

These spaces have been identified by the community as being very important to them to safeguard. As stated in The Chobham Poor Allotment Charity's representation, it is a charity which was "allotted" land in 1861 and the designated use for this land is for the benefit of the poor inhabitants of the ancient parish of Chobham.

At the moment, parts of the land in question are used as allotments, and the local community value this provision. There is limited allotment provision in the Parish and demand is high. It is, however, accepted that the charity is under no legal obligation to provide allotments. Nevertheless, regardless of how the land is used at any given time, the overall purpose remains that it is used to the benefit of local parishioners.

We feel very strongly that the two spaces should be retained as local green space. Support for this was raised by the community during the engagement period for the neighbourhood plan and again at the Regulation 14 consultation.

Parts of the sites are included as 'Green Space' (not to be confused with 'Local Green Space') within the emerging Local Plan. We consider that the boundaries as shown in the CNP are correct for the whole area of land that falls within the remit of delivering the purposes of the charity. This is with the exception of those areas that constitute private gardens, and we would be content to remove those from the designation. It is our understanding that the two plots on the western site have been sold fairly recently to private individuals.

Policy CH12

The policy takes a balanced approach to the protection of views.

I note the comments in paragraph 7.40. It would be helpful if the Parish Council expanded on the way in which it identified the views.

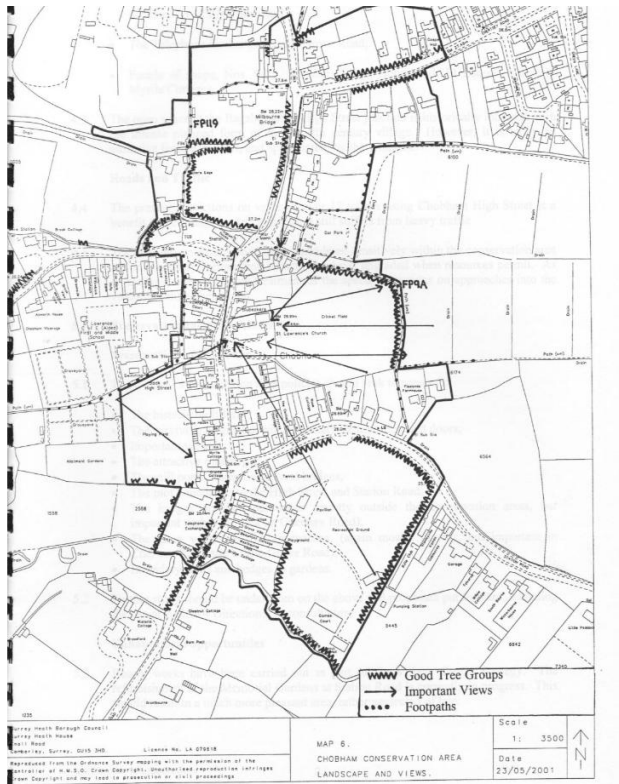
The community were made aware early in the process that there was an opportunity to identify views within the parish they considered to be important to them. This might be because they encompass a particular landscape of importance, a notable landmark or asset, they might evoke a sense of place and/or contribute to local character and how this can be appreciated. Views could be within the village or the wider countryside but would need to be viewable from a public location and be contained within the parish boundary.

The community were invited to provide their views on this in multiple ways: via the community survey and at the community events held at the village hall (which included maps for marking up).

Each suggested view was visited by members of the SG to consider whether it met the criteria as set out above, although it was acknowledged that there would be a level of subjectivity, which is acknowledged in national policy too, where NPPF Para 132 states "*Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development*".

In addition to views suggested by the community, the SG wished to include the views as identified in the Chobham Conservation Area Appraisal, to give them greater credence (see *Figure 1*), although each was visited to ensure that the view identified was still valid.

Figure 1: Views identified in the Conservation Area Appraisal



We note that the numbering of the views in the Appendix of the CNP needs to be amended.

Policy CH15

I note the approach taken in the policy and the supporting text. For clarity, is the policy intended to replace the requirement in the Surrey Parking Standards?

Could the high minimum parking standards lead to a car-dominated landscape?

The policy intends to respond to the fact that there is a high level of car ownership locally, due in part to the rural nature of the parish. There is also a lack of adequate public transport. The objective is to ensure that new development provides adequate space taking into account this locally-specific aspect. The SG followed a similar approach taken by Windlesham Parish in their neighbourhood plan, which experiences a similar issue, and which has since passed its referendum. As in that Plan, the CNP policy does not impose minimum requirements, rather guidance on the spaces required.

We consider this an adequate approach, but if necessary, would be minded to include an additional sentence at the end to suggest **“unless it can be demonstrated that this would render the scheme unviable, undeliverable or significantly impact the appearance of a proposed development”**.

Policy CH16

This is a very effective and locally distinctive policy. Appendix D helpfully underpins the approach taken.

This comment is noted.

I would find it helpful if the Parish Council would respond to the comments from:

- **ADP Fair Oaks & Vistry Group**
- **Chobham Poor Allotment Society**
- **Kingsbury Investment and Development**
- **Peter Fitzsimons**
- **Surrey County Council**

The Borough Council also makes a series of comments and suggested revisions to the Plan. It would be helpful if the Parish Council would respond to those comments.

The responses from the SG to the comments of those listed above are included in Appendix A of this response.

We are grateful for the opportunity to provide further clarification on these questions and points.

Cllr Emma Kennedy

Chair of the Chobham Neighbourhood Plan Steering Group

Appendix A - Comments on the responses received at Regulation 16

ADP Fairoaks & Vistry Group

Policy CH1 – Location of Development: It 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.

We refer to our answers above in relation to the timing of the CNP in relation to the emerging Local Plan. We consider the CNP to conform to the policies of the emerging Local Plan.

We also refer to our previous answers in relation to how grey belt might be identified in the parish. The CNP would not preclude such sites being identified at the strategic level.

The CNP does not include sites for allocation. This is not a requirement of neighbourhood plans, and the SG decided early on that this was not something they wished to pursue. This is largely due to the fact that, as expressed earlier, there is no current strategic policy in the adopted Plan enabling the neighbourhood plan to removing areas from the Green Belt, for instance for development, as required by paragraph 145 of the NPPF.

Policy CH2- Meeting Local Housing Needs: The Parties 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, especially if Land at Fairoaks Airport is deemed to be Grey Belt and 50% affordable housing is required.

This is noted, but as explained, the CNP has not sought to identify grey belt land. This would be undertaken by the local authority as part of a Green Belt review. Policy CH1 does not preclude site allocations coming forward via a Local Plan.

Policy CH3 – Character of Development: Object

The Design Guidance and Codes for Chobham was prepared externally by the Urban Design Team at AECOM. They undertook extensive work, in consultation with the community, to map out the local character areas in the parish and the Guidance provides evidence of this. Whilst it is accepted that Fairoaks Airport comprises an economic use within the character area described as rural hinterland, the SG consider that nature of the activity does not detract from the overall character as described in the Design Guidance. View 8, as identified in the Views policy, describes this and provides photographs of residents walking in this area and views across the site which contribute to the character of the area.

The consultee has suggested that some wording of policy CH3 be amended to *“Development proposals should conserve and, where practicable, enhance the character of the Conservation Area or Character Area in which it is located, unless the proposal is located on land that does not reflect those particular characteristics”*. We would prefer not to include this text; as above, we consider that this part of the Parish does contribute to the character described within the rural hinterland context.

Policy CH4 – Energy Efficient and Design: The CNP goes beyond government building regulations without any supporting evidence including viability testing, the policy is therefore unjustified.

We do not agree with this assessment. We consider that the policy takes a non-prescriptive approach and would prefer to retain the wording as currently drafted.

Policy CH8- Supporting Local Employment Opportunities: Policy CH8 of the CNP mimics Policy ER3 of SHBC's submission version Local Plan, which does not remove the Strategic Employment Site at Fairoaks Airport from the Green Belt. There is no need to link the function of the Strategic Employment Site to the wider function of the site.

The SG consider this an important policy in the context of the Plan and the Parish. In the context of the advice provided in the response from SHBC, we would be minded to amend the policy as suggested by SHBC so that it aligns to strategic policy.

Policy CH10 – Green and Blue Infrastructure and Biodiversity Net Gain: 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.

As the CNP is not allocated sites for development, no guidance has been provided on SANG provision. This is considered to be adequately considered in the Local Plan (including the emerging Local Plan).

Policy CH12 – Locally Significant Key Views - Delete the Policy or remove View 8 View over Fairoaks.

The SG would prefer to retain the policy. This view was identified by the community. It was the subject of much debate locally. The policy is not intended to preclude development that might interfere with any of the identified views, rather to ensure that any development proposals impacting the view arcs are mindful of those impacts and find ways to mitigate them. This could be achieved through careful design. We do not consider it would be helpful to remove either the policy as a whole or this particular view, which is supported locally.

Policy CH14 – Improving Walking, Cycling and Equestrian Opportunities: The proposals at Fairoaks contain extensive walking, cycling and equestrian opportunities. The plan on p.23 of Appendix 3 demonstrates the provision of pedestrian / cycleways through the Site and to Woking.

This comment is noted.

Policy CH16 - Providing a Range of Community Facilities: The promotion proposals at Fairoaks contain numerous community facilities including retail facilities, community centre, primary school, sports hub and mobility hub.

This comment is noted.

Chobham Poor Allotment Society

See our earlier response to Policy CH11.

Kingsbury Investment and Development

Policy CH1: Location of Development: Suggest amending to include “...proposals must meet either the exceptions to inappropriate development in the Green Belt, including the utilisation of grey belt land, or demonstrate....”

We do not consider that the policy, as currently drafted, would preclude this.

Peter Fitzsimons

Basic Conditions: It is recommended that, to be positively prepared and support sustainable development, the Neighbourhood Plan make housing allocations and, in relation to Policy CH1, reflect the potential that Grey Belt land could have to provide housing and other required development.

This is noted. As clarified earlier in this document, there is no requirement for the CNP to allocate sites for development, including housing. The SG discussed this approach but decided not to pursue it. The housing required to meet Borough-wide need is being allocated as part of the emerging Local Plan. This includes sites within Chobham Parish. It is considered that the housing need for Chobham is met through the emerging Local Plan.

In any case, the majority of land that might be available for development in the Parish sits within Green Belt. There is no current strategic policy in the adopted Plan enabling the neighbourhood plan to removing areas from the Green Belt, for instance for development, as required by paragraph 145 of the NPPF.

Policy CH1 – Location of Development: Suggestion that grey belt is explicitly mentioned in the policy.

We do not consider that the policy, as currently drafted, would preclude grey belt sites being identified.

Policy CH2 – Meeting Local Housing Needs: We suggest that CH2 be simplified and made less prescriptive by using more flexible language or viability caveats rather than fixed high percentages on all sites, aligning with the PPG expectation that affordable housing targets be evidence-based and realistic.

We consider that the policy is worded appropriately and with sufficient flexibility. It is underpinned by the Housing Needs Assessment prepared for the Parish and will help to ensure that new development in the parish meets identified local housing needs.

We recommend the addition of wording to CH2 for self-build schemes, for example, allowing standalone self-build plots and also units on major sites to be self or custom-built in line with NPPF paragraph 28. This addition would help meet a recognised local need while supporting overall housing delivery in Chobham.

The emerging Local Plan proposes to include a clause on self-build homes. We would be minded to including an overarching clause for instance: **“Subject to the other policies of this plan, proposals for self- and custom build housing will be supported”**.

Policy CH5 – Drainage, Flood Risk and Infrastructure: The policy could refer to the latest guidance and take a more flexible approach.

Flooding is a significant problem in the area, notably in the village itself. We consider the policy is worded to reflect this and would not wish to make it more flexible.

Policy CH10 – Biodiversity Net Gain: It should acknowledge the statutory exemptions to avoid conflict with legislation. Any local ambitions above 10% should be framed as targets or ‘where feasible’ goals, not as a compulsory minimum for all schemes.

We would be minded to including wording to acknowledge that not all development proposals are required to deliver BNG. On the uplift, we consider that the policy is worded flexibly (“with the aim of”) as opposed to being compulsory.

Surrey County Council

Paragraph 1.8 should list all the correct documents.

We are content to add these documents to this paragraph.

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.

We would be content to contact the HER for the latest layers to update these Figures.

Flood Risk: suggested text amendments

We welcome the comments received and would be content to incorporate all of these as suggested. They will help to strengthen the policy.

Ecology: suggested text amendment to Part 2

We would be content to amend the text as suggested.

Local Green Spaces: comments relating to Wishmore Cross Academy field and Playing Field west of High Street

We would be minded to retaining the two spaces as justified in the Plan and as explained in our Regulation 14 response on this point. We would, however, be content to include additional text within the policy to allow for flexibility. We consider this would be acceptable on local green space as per para 154 of the NPPF.

Transport:

Suggested update to para 8.2

We would be content to amend this sentence as suggested.

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.

We would be content to add this into Policy CH15.

Surrey Heath Borough Council

See overleaf

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.

Responses from the SG are noted in red below

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. Happy to amend
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....” Happy to amend
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 Fairoaks Airport is a Strategic Employment Site in the Regulation

		19 Local Plan, not a 'Locally Important' Employment site. Happy to amend – and see also comments on this policy.
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. Amend.
Policy CH1: Location of development	CH1(1)	Criterion 1 – add ‘or as shown by <u>superseded by</u> the Surrey Heath Local Plan 2019 - 2038’ Reason – to provide clarity that there will be only one defined settlement boundary. Amend.
Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
Policy CH1: Location of development	CH1(2)	The policy is currently somewhat unclear as to whether just one, all, or some combination of criterion must be met. 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..' We would be content to accept this change, which would require a slight reordering of the clauses.
Policy CH1: Location of development	Figures 3, 4 and 5	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. 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. Agreed that the Figures can be updated.
Policy CH2: Meeting Local Housing Needs	CH2(1)(a)	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. Noted.

Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
Policy CH2: Meeting Local Housing Needs	CH2(1)(b)	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. We would be content to include the words 'subject to viability' here. 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. Agreed. 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. Noted. The wording has been included for clarity in the context of seeking a high percentage (where viable). 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.

		We would be minded to amend the text to include 'Proposals for First Homes should seek to...'
Policy CH2: Meeting Local Housing Needs	Para 4.14	Out of date reference to Reg 18 Local Plan. Amend as follows: Draft Policy H5 (Range and mix of housing) of the Regulation 18 <u>19</u> Local Plan suggests that....
Policy CH2: Meeting Local Housing Needs	Para 4.13, 4.22 and 4.23	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 HQ2 in the Local Plan evidence base. Amend.
Plan section or Policy	Paragraph no. / Policy criterion no.	Comment

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. Amend
Policy CH3: Character of development	CH3(4)(a)	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) Add in. 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. The views are set out specifically in Policy CH12. They are a combination of views identified by the community and a consideration of views identified in the CA appraisal.
Policy CH4: Energy efficiency and design	CH4(2)	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” Amend 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) Noted and agree to include reference to this.
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 IN1criterion (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. We would be minded to include text to the effect that this could be secured through planning obligations.
Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
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. We would be content to mirror the wording proposed in MM7.14.

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 <u>Strategic</u> Flood Risk Assessment (SHSFRA). Update
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. Amend with most recent map and add a date.
Policy CH6: Conserving heritage assets	CH6(3)	Suggested amendment: "...determined based on national planning policy <u>and in accordance with the Development Plan</u>", Amend
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. Agree to delete this example.

Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
Policy CH7: Chobham Village Centre	CH7(2)(d)	The policy refers to the wrong appendix – should be reference to Appendix D. Amend 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. Amend to retail/ community 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. Appendix D includes text which is unclear in terms of whether it relates to retail and/or employment – see comments on Appendix D. See comments later
Policy CH7: Chobham Village Centre	CH7(4)	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>. Suggest align text in CH7(4) to mirror CH6(4).

Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
Policy CH8: Supporting Local Employment Opportunities	CH8(4) and (5) and para 6.19 and Figure 18	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. The Regulation 19 Local Plan proposes boundary amendments to all three sites, some considerable e.g. at Highams Park. In order to be in general conformity with the emerging policies in the Development Plan the following amendments are suggested: • 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. We would be content to amend as suggested.
Policy CH10: Green and blue infrastructure and delivering biodiversity net gain	CH10(2)	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. 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.

		SCC has commented on this clause and we would be minded to accept their suggested amendment.
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Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
Policy CH10: Green and blue infrastructure and delivering biodiversity net gain	CH10(5)(a)	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. We suggest that CH10(5)(a) is amended to be in line with NPPF para 193 and Natural Environment PPG (Paragraph: 034 Reference ID: 8-034-20190721). We agree that the clause should be amended to align with policy and guidance as suggested.
Policy CH10: Green and blue infrastructure and delivering biodiversity net gain	CH10(5)(a)	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. We would be minded to include both of these approaches.
Policy CH11: Local Green Space	CH11 in general	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. 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. We would wish to retain the designations but amend the boundaries to mirror those in the emerging Local Plan and remove the private gardens.
Policy CH11: Local Green Space	Para 7.37	'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. Amend

Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
Policy CH14: Improving Walking, cycling and equestrian opportunities	CH14(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. Amend.
Policy CH14: Improving Walking, cycling and equestrian opportunities	CH14(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. Insert 'as appropriate', although we consider flooding to be a considerable issue in the parish, hence the push for permeable surfacing.
Policy CH14: Improving Walking, cycling and equestrian opportunities	CH14(2)	Policy criterion CH14(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 CH14(2). 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. This is an error. The policy should refer to Figure 28.
Policy CH14: 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 .

		Add in.
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Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
Policy CH15: New residential development parking space standards and design		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. 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. See previous response to examiner’s question on this matter.

Chapter 12: Policies maps	-	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. The proposed settlement boundary for the Local Plan should be amended to align with the Regulation 19 version. Amend.
Chapter 14: List of evidence documents	-	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. Noted and amend.

Plan section or Policy	Paragraph no. / Policy criterion no.	Comment
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. Noted and content to make this clearer as suggested.
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. Noted, this has been included in error and can be removed.
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. Amend.

