



CHOBHAM PARISH COUNCIL

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Planning Policy
Finance and Customer Services Directorate
Surrey Heath Borough Council
Surrey Heath House
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By email: planning.consultation@surreyheath.gov.uk

Dear Sir/Madam

Draft Surrey Heath Local Plan (2019 - 2038): Preferred Options Regulation 18 Consultation

Chobham Parish Council has reviewed the Draft Surrey Heath Local Plan: Preferred Options (2019-2038) and accompanying documentation, and considered the consultation material from Chobham's perspective. It is hoped by offering the following detailed response, which has taken a great deal of time to compile, that the opinions, issues and priorities presented will be given a high degree of attention and will be duly reflected as the Plan progresses.

This representation has been prepared giving regard to the Parish Council's previous response to the Local Plan Issues and Options consultation, as well as its responses to national planning consultations, themes arising from planning application responses in recent years, actual planning and enforcement situations within the Parish and various other relevant sources.

The Council would like to thank the Planning Policy team for the production of the draft plan which is noted to contain a large amount of improvements on its 2012 predecessor, and for their time spent on supporting activities during the consultation period.

Section 1: Key Challenges, Vision and Objectives

Key Challenges, Vision and Objectives

- While it is noted that Fair Oaks Airport is one of the locally important employment sites under Objective B, its value goes beyond employment land, and it is suggested that in line with NPPF paragraph 106f, the specific importance of maintaining a national network of general aviation airfields should be included in the strategic objectives.

Section 2: Spatial Strategy

Policy SS1: Spatial Strategy

- The approach of focusing new development in the most sustainable and accessible areas of the Borough is supported.
- While recognising that figures are government mandated, there is concern that the amount of housing proposed overall is unrealistically high when considered in terms of the constraints in Surrey Heath Borough, and in terms of the principles of “levelling up” across the country. The Parish Council would support any opportunity to secure a reduction.
- It is noted that the Chobham village boundary is proposed to be revised, and inset from the Green Belt. The Parish Council would have welcomed the opportunity to be fully engaged with the boundary study, and feels it could have added value to the process.
- It is also noted from the boundary study that “whether or not a settlement continues to meet the requirements of the NPPF is relevant to the consideration of exceptional circumstances warranting an alteration to Green Belt boundaries, but it is only part of the consideration”. It is therefore difficult to offer fully informed comment without understanding the full exceptional circumstances being put forward to warrant the proposed change.
- It is felt that a more in-depth and fine grain consideration of the village boundary would be appropriate, with the Chobham community involved in the process. It is recognised that detailed amendments to such boundaries may be made through non-strategic policies, including neighbourhood plans (NPPF paragraph 140), and felt that this is a process which should be followed to ensure greater local representation.
- Notwithstanding the above, the Parish Council believes that the following areas of the village are among those that function well against the purposes of the Green Belt and should not be inset:
 - North of 81 Windsor Road
 - The entirety of The Avenue
 - Mincing Lane north of The Avenue
 - Station Road east of the Recreation Ground
 - Any row of housing with residential gardens that back onto open fields, e.g. parts of Chertsey Road west of Green Lane, parts of Windsor Road (west side) and parts of Leslie Road.
- It is noted that Garden Drive and Orchard Court are included within the boundary proposed to be inset from the Green Belt. It is understood that any boundary review will not affect its status as a rural exception site.
- Further clarification is sought regarding the nature of development anticipated in the event of Chobham village being inset from the Green Belt. The Local Area Principles are vague/silent for the majority of the village beyond the Conservation Area.

- There is concern that inset status would lead to higher rise buildings (3+ storeys compared to the current prevalence of 2-storeys), backland development, disregard to the established pattern and grain of building, loss of village character etc. Even the more densely built areas of Chobham are currently characterised by gaps between buildings, relatively open skies with little shading, modest to large residential gardens and good sunlight. This character should be retained and, where possible, enhanced.

*Policy SS2:
Presumption in Favour
of Sustainable
Development*

- The Parish Council recognises the national policy presumption in favour of sustainable development and supports the principle of development being allowed to proceed where it accords with national and local policy, provided such policy is suitable for the locality, robustly worded and interpretations are clear.
- There are concerns regarding any policy (such as some prior approval applications) which allow for development to proceed should the planning authority fail to determine within a prescribed period of time. This has the potential to seriously undermine almost any of the objectives set out in the plan, and the Parish Council would like to see this acknowledged and addressed as far as possible in the Local Plan.

*Policy SS3a: Climate
Change Mitigation*

- Policies regarding climate change mitigation and adaptation are welcomed and supported.
- The Parish Council supports development being directed towards areas that will minimise the need to travel and maximise the use of sustainable modes of transport.
- It is noted that there will be a Climate Change and Green Infrastructure SPD and the Council trusts that this will be available for consultation in due course.
- While it is noted that “green infrastructure” includes water elements (blue infrastructure) for the purposes of this plan, some other planning authorities both locally and nationally are using the headline term “green and blue infrastructure” for documentation. In order that Surrey Heath is not perceived to be overlooking the importance of blue infrastructure, this may be something to consider.

*Policy SS3b: Climate
Change Adaptation*

- As above, policies regarding climate change mitigation and adaptation are welcomed and supported.
- In order to be effective, certain adaptive measures to be included in new development (green infrastructure, planting, biodiversity net gain etc.) will need to not only be delivered but also maintained or enhanced through the life of the development. Policy should require development proposals to demonstrate how ongoing maintenance will be achieved.

Section 3: Housing

*Policy HA1: Site
Allocations*

- The Parish Council has reviewed the site allocations documentation and notes that three sites in the Parish are listed as realistic candidates

for development (Broadford, Chobham Rugby Club and Chobham Club).

- Of the three sites, only Chobham Rugby Club (indicative 91 units) is allocated through the Local Plan due to it being the only one of the three projected to deliver 25+ new homes.
- The Parish Council objects to the deletion of the Green Space designation for Chobham Rugby Club (HA1/13), with reasons explained in the Green Space section (IN6).
- The wording “ensures permeability” and “ensures linkages” in HA1/13 would be preferred over “encourages” to strengthen the importance of this element.
- 91 indicative new homes would potentially represent 200+ additional people requiring primary healthcare in Chobham. An appropriate uplift in primary healthcare capacity within Chobham should be one of the development requirements for the site to ensure that new residents receive the GP service they need and the already stretched service for existing residents does not decline any further.
- A further development requirement for the Rugby Club site should be that it includes bridleways or multi-user routes. The location close to Chobham Common, where the right to air and exercise applies equally to pedestrians and equestrians over the whole Common, means that for the purposes of connectivity, access to the Common is equivalent to access to a bridleway.

Policy HA2: London Road Block Site Allocation

- Not applicable to Chobham.

Policy HA3: Land East of Knoll Road Site Allocation

- Not applicable to Chobham.

Policy HA4: Mindenhurst, Deepcut Site Allocation

- Not applicable to Chobham.

Policy H5: Range and Mix of Housing

- The Parish Council supports the provision of a balanced range and mix of housing to match very local needs.
- The Parish Council also supports measures aimed at ensuring residents can stay in their local area if housing needs change.
- When considering current and future accessibility needs, it is felt that accessible parking for those with mobility challenges could be given greater consideration in areas such as Chobham where there is a high reliance on motor vehicles.
- The housing needs assessment raises a particular issue with lack of smaller houses and bungalows, however it is noted that many such dwellings have been lost in recent years to extensions and

replacements with larger dwellings. The small dwellings that remain tend to command a premium price due to scarcity. It is felt that particular attention needs to be given to the needs of older persons seeking to downsize in the local area.

- Policy H5 indicates that certain types of proposals will be supported/permitted, though it is not made clear whether the proposals need to meet planning policy in all other respects (e.g. design, character and sustainability).
- It is felt that paragraph 3.81 regarding local area characteristics is important enough to be included within the policy H5 policy framework itself.
- The Range and Mix of housing policy does not appear to include anything to manage possible undesirable effects of an over-concentration of any one type of housing in a localised area.

Policy H6: Specialist Housing

- The Parish Council supports the preferred approach for specialist housing in general.
- The Parish Council's response to Question 10 (Policy H5) raises a concern about the loss of smaller houses and bungalows. The loss of these types of dwellings could create additional demand for specialist housing.
- It is felt that units specifically designed to be downsized homes should have permitted development rights removed from the outset and be ineligible for development that increases their size. This is to ensure they continue to meet the needs for which they were designed.
- It is unclear where or if the 65-bedroom care home (or 66-bedroom if the new application is approved) with granted (and lawfully commenced) permission at Orchard Cottage, Shepherds Lane has been accounted for in the Housing Trajectory. The figures shown for care homes in each column appear to be much smaller.

Policy H7: Affordable Housing

- The Parish Council supports in principle the approach for affordable housing, in particular the measure that guards against subdivision of larger sites.
- While there are concerns about the 25% of affordable housing to be provided as First Homes as this may not be the area of greatest need, it is noted that this is a nationally mandated threshold.
- The inclusion of a tenure split of remaining affordable housing to reflect up to date local housing needs evidence is welcomed (3.103).
- It is questioned whether the first sale figure of no higher than £250,000 stated in 3.101 is subject to change reflecting market conditions and/or inflation.

Policy H8: Loss of Housing

- The Parish Council supports the preferred approach resisting loss of housing.
- It is felt that H8 (3), which supports the retention of housing such as single storey homes, could be strengthened to more actively resist the loss of such homes where there is local need.

Policy H9: Rural Exception Sites

- “Small scale” is open to interpretation, and clarification or examples of what constitutes small scale should be supplied.
- There is concern about the effectiveness and monitoring of ensuring housing is allocated to people with a local connection. It appears to have been accepted that the rural exception site at Little Heath Nursery failed in this regard. Policy should ensure that this is not allowed to happen again.
- The number, size and tenure of homes on a rural exception site should reflect evidenced local affordable housing needs in a proportionate way, i.e. so that there is a tenure split that makes a contribution towards each type of local housing need, putting the greatest needs first. Sites should not be allowed to oversupply tenures in lesser local demand, leaving unmet need and gaps in other categories.
- Since the sites are by definition outside the settlement boundary and therefore on the sensitive cusp of where greater built form meets the more rural area, no part of a rural exception site should be built higher or with more storeys than the prevailing built form of the part of the settlement area to which it attaches.
- It is noted and welcomed that the relevant Parish Council must agree survey methodology along with the Borough Council (3.127). The Parish Council would therefore expect early engagement prior to a planning application being submitted.
- No terms in any proposed legal agreement should suggest or place any responsibility on Parish Councils without prior consultation.
- The definition of “local connection” should similarly be agreed by the Parish Council and Borough Council at an early stage. If the local connection criteria is too generous, it could lead to discounted homes being secured by short-term renters in the area and excluding those with genuine established local connections for whom the policy is designed.
- The Parish Council has particular concerns regarding “cascading”, which allows housing to be secured by people outside of the immediate local area, contrary to the purpose of rural exception sites. Any proposed cascading arrangements should be accompanied by strong justification as to why they are required, particularly for first occupation, when the homes are in response to an already identified local need.
- In all cases, the Parish Council should be engaged from an early stage. Considering the very local nature of rural exception sites, the Parish Council is best placed to understand the issues at a fine grain level. Engagement should not be left until it is too late to be meaningful.

- It is felt that it could be clearer in the policy that the local connection criteria must apply on first sale and each subsequent sale.
- There is concern that a Community Land Trust scheme (3.130) would potentially not be robust or independent enough to maintain the local connection and affordable criteria over time. Details of proposed Community Trusts in planning applications to date have been vague and made speculative statements concerning matters such as funding and who would serve as Trustees. One application proposed that the Trust be awarded an annual grant from the Parish Council, without any discussion with the Parish Council having taken place.
- Where rural exception site proposals are to meet an immediate, identified local need, it would be expected that development should be conditioned to begin within a timescale shorter than the three-year standard period (NPPF paragraph 77). One year would appear to be appropriate in this instance.
- The requirement for any proposed market housing to be accompanied by robust exceptional circumstances and kept to an absolute minimum is strongly supported.
- Where a scheme is to include market dwellings, would it be possible for these to be marketed within the local community in the first instance?
- Not applicable to Chobham.

*Policy H10: First
Homes Exception
Sites*

*Policy H11: Gypsies
and Travellers and
Travelling Showpeople
Accommodation*

- As per responses to previous sections above, the Parish Council would expect to see a policy requirement designed to prevent an over-concentration of any one type of housing accommodation in a particular area.
- The keeping of farm animals and any other large animals on site should only be allowed where adequate land/stabling has been permitted and provided for the animals' welfare.
- The Parish Council supports a minimum pitch/plot requirement to help avoid fragmentation. It would be helpful for the terms pitches and plots to be explained either in the policy or in the glossary to avoid any ambiguity.
- While it is understood that certain sites may require space for business related storage, any proposed industrial, quasi-industrial or other use on the site must be made clear at application stage and assessed against relevant separate policy.
- Appropriate boundaries, bunds and landscaping should not only be delivered, but maintained (or enhanced) through the life of the development.

Policy H12: Site Allocations for Gypsy and Travelling Showpeople Accommodation

- No site is currently allocated for Chobham, but it is noted there is a call for sites in progress and any further proposed allocations will be subject to further consultation. The Parish Council agrees with this approach.

Section 4: Town Centres, Retail and Economy

Policy CTC1: Camberley Town Centre

- Plans for the growth and improvement of Camberley Town Centre are supported.
- As a point of observation only, and as has been noted before, Chobham is more connected (better public transport and closer) to Woking than it is to Camberley. Further comment in this respect is made in the Movement and Accessibility section (CTC3).

Policy CTC2: Camberley Town Centre Primary Shopping Area

- Plans for the growth and improvement of Camberley Town Centre Primary Shopping Area are supported.

Policy CTC3: Movement and Accessibility

- Plans for movement and accessibility in Camberley Town Centre are supported.
- The Parish Council would welcome any initiatives to improve the accessibility of Camberley town centre via public transport for Chobham residents.

Policy ER1: Economic Growth and Investment

- It is urged that in line with NPPF paragraph 106f, the specific importance of maintaining a national network of general aviation airfields should be reflected by including aviation as a key employment sector in policy ER1(3), and as a general theme throughout the Local Plan.
- As a key employment sector, specialist engineering and aeronautical engineering could be an area for development. The potential for growth in employment in the training of pilots should also be encouraged in line with the Government's strategy.

Policy ER2: Strategic Employment Sites

- It is suggested that the current site names of Highams Park and Longcross Garden Village could be used throughout the plan rather than former British Oxygen Company and former DERA respectively.
- The reference to Frazer Nash (Chobham) in paragraph 1.83 should be updated to Gordon Murray Group.
- The Parish Council supports the approach. It would like to see a point added to policy ER2 to reflect the need for sites to comply with other relevant policy as noted in paragraph 4.63. The two strategic sites in Chobham are in sensitive green belt areas, close to Chobham Common and accessible via rural roads, and as such it would not be appropriate for them to develop into large or multiple-employer business/industrial parks.

Policy ER3: Locally Important Employment Sites

- As stated previously, the value of Fairoaks Airport goes beyond employment land, and it is suggested that in line with NPPF paragraph 106f, the specific importance of maintaining a national network of general aviation airfields should be recognised in any policies concerning the airport.
- An additional level of protection and priority should be provided to commercial employers at Fairoaks associated with the general aviation industry.
- The Parish Council has noted that the former major developed site's boundary is proposed to be extended to include the Alpha 319 business centre as part of the Locally Important Employment Site. This is accepted, but it is urged that this boundary is not extended any further than that proposed, in order to protect and retain the openness of the surrounding fields and airfield.
- Buildings for employment on Locally Important Employment Sites should be safeguarded from conversion to residential under permitted development via the issuing of an Article 4 direction.

Policy ER4: Yorktown Business Park

- Not applicable to Chobham.

Policy ER5: Rural Economy

- The approach in principle is supported, but it is felt that the policy could be strengthened considerably, in order to go further to protect the character of the rural area.
- Chobham Parish Council is concerned about the permanent loss of agricultural, equestrian and other rural sites to general industrial and other commercial uses unsuitable for the rural area. It would like to see policy that strongly encourages and prioritises businesses that are rural in character, or fit comfortably in a rural area.
- Sites in sensitive areas, such as close to residential properties or bordering Chobham Common, should not be allowed to develop into industrial or dense commercial sites. There are several examples in Chobham of sites developing well beyond what was originally approved both in terms of built form and diversification of operations. Enforcement has not been effective in controlling the various issues arising.
- It should be a policy requirement that where non-rural economic use is proposed, a thorough justification is given as to what alternative sites have been considered and why the proposed use cannot be accommodated in a more suitable urban or edge of town location.
- Some past proposals have sought to convert rural business or farm sites into residential on the premise that "economic purposes" includes the conversion to housing. Clarification as to whether conversion to residential is covered under this policy or not would be appreciated. There is concern that the loss of business use can adversely affect the overall economic sustainability and employment opportunities within the local area.

- It is felt that ER5(3), which deals with the potential effects on local communities, should extend to development for economic uses close to or abutting settlement boundaries as well as within them.
- For any proposal, the development's design must integrate into its setting, with particular attention to ensuring frontages and views from the public realm remain rural in character.
- Development with a significant amount of out-of-hours and/or night operations should be considered to be unsuitable for a rural environment.
- With Chobham and other rural areas being relatively poorly served by public transport, economic development that would generate a large amount of trips and/or not employ mainly local workers should be directed towards more sustainable locations.

Policy ER6: Frimley Park Hospital

- The preferred approach for Frimley Park Hospital is supported.

Policy ER7: Edge of Centre and Out of Centre Proposals

- The approaches for Edge of Centre and Out of Centre proposals are supported. It is anticipated that there will be limited opportunity for such development in Chobham due to its lack of accessibility via sustainable transport.

Policy ER8: District and Local Centres

- The Parish Council supports policy to designed to invigorate centres and improve their vitality.
- There is concern that General Permitted Development has the potential to override the aims of this policy and bring about decline. As stated in the response to the Design and Heritage section, the Parish Council believes it would be appropriate to consider introducing an Article 4 Direction for Chobham's Conservation Area to ensure permitted development does not override design and heritage principles for this area, and to protect the compact central core which also serves as the main retail centre for the village.
- The Parish Council urges that the planning authority explores every opportunity to ensure that the views of occupiers, neighbours and local people are given substantial weight in the shaping of their local centres.
- Unless already secured via an Article 4 Direction, opportunities should be taken to remove permitted development rights to ensure uses remain a good fit for the local centre and the character of the area.
- The Parish Council strongly supports the retention of ground floor, primary frontages for uses compatible with the overall retail function of the local centre. Changes of use of primary units to residential is considered particularly harmful.
- Policy should ensure persons with mobility challenges are not disadvantaged from accessing everyday shops and services.
- The particular challenges of rural centres should be recognised. In Chobham's compact centre with its limited number of units, the overall

offering of the High Street is critical to generating footfall. Any loss of even a single retail unit has the potential to erode the attractiveness of the centre to visitors.

- There is concern that some retail units are being permanently used as a shop window display only, with the shop not open to the public (or by appointment only) and usually with a notice directing the public to a website or other means of contact. This type of use makes a poor contribution to the overall vitality and attraction of the local centre and potentially blocks more active use of the unit and employment opportunities. Any policy aimed at preventing this type of passive unit would be welcomed.

*Policy ER9:
Neighbourhood
Parades*

- The Parish Council supports the approach for Neighbourhood Parades.
- As with Local Centres, there is concern that General Permitted Development has the potential to override the aims of this policy and bring about decline.
- Policy should ensure persons with mobility challenges are not disadvantaged from accessing everyday shops and services.
- Wherever possible, Neighbourhood Parades should include convenient cycle parking to help encourage cycling for everyday needs.

Policy ER10: Old Dean

- Not applicable to Chobham.

Section 5: Infrastructure

*Policy IN1:
Infrastructure Delivery*

- The Parish Council supports the approach in principle, provided any mitigation or replacement measures do not result in reduced convenience for the community, and do not introduce negative impacts outside of the development for the benefit of the development itself.
- It is critical that a joined up approach with neighbouring boroughs is taken when considering infrastructure delivery. Surrey Heath Borough Council will be well aware of the major Longcross Garden Village development, part of which spans the boundary of Chobham Parish. This mixed-use development including 1,700+ additional new homes has the potential to strain many areas of Chobham's infrastructure and create a cumulative effect with other developments.
- Stakeholders, including Parish Councils, should be engaged to help ensure that infrastructure delivery meets local need.
- The intention to introduce a new Infrastructure Levy to replace CIL and S106 is noted. The Parish Council trusts that this will be consulted on, and that there will be no net reduction in the CIL monies currently passed to the Parish Council.
- If it is not already the case, the Parish Council would support the collecting of levies associated with larger developments in instalments to help infrastructure be delivered as the development progresses.

- Infrastructure phasing (IN1(3)b), particularly for larger developments, is a key concern for local communities and applications should be required to include for consultation purposes a phasing strategy at a level of detail proportionate to the size of the development.
- It is suggested that burial land is considered as essential infrastructure and the sourcing of additional burial land given a higher priority at strategic level.
- While Chobham's primary school needs for the most part are adequately catered for locally, there are notable challenges with secondary school places. There appears to be no clear and established local catchment, and places are routinely offered at schools across multiple boroughs, several without public transport options or dedicated school buses, and only accessible by private motor vehicles. With the emphasis being given to action on climate change, this is an infrastructure concern that could be significantly improved.

*Policy IN2:
Transportation*

- It is urged that horse riders and bridleways are considered and specifically mentioned alongside pedestrians and cyclists in all relevant policies.
- The Parish Council supports the introduction of multi user routes wherever possible to enable equestrians and pedestrians to enjoy the same consideration as cyclists. Chobham accommodates a very large number of horses, and their owners make a significant contribution to the local economy. New developments in Chobham should provide multi user routes linking up wherever possible with the existing Rights of Way network and/or Chobham Common.
- Greater attention should be given to ensuring cycle storage and cycle parking is not only delivered and retained, but is secure and fit for purpose. Storage at homes and larger employment sites should be at minimum a fully weatherproof enclosure, lockable, and spacious enough to store accessories.
- Opportunities for "joined up" solutions should be maximised (e.g. secure cycle parking near bus stops and at car club locations etc.).
- Safe, continuous footways and pedestrian-priority crossings between settlement areas, Local Centres and schools should be given high priority in plans. A large number of Chobham residents within the settlement area cannot currently walk to the village centre without having to cross at least one of the main A-roads with no pedestrian-priority crossing place. This is of course a particular challenge for more vulnerable footway users.
- It is noted and welcomed that the improvement of cycle connectivity in Chobham is highlighted as a local area principle. The Parish Council would welcome the opportunity to engage with studies in this regard, and would like to note that there is currently no public cycle parking facility in either the main public car park in Chobham High Street, or at the Chertsey Road neighbourhood parade. This would appear to be a matter that could quickly and easily be addressed. There are various

other barriers to everyday cycling including safety and practicality considerations, the high volume and speed of motor vehicles, and condition of the roads.

- It is questioned why the provision of a car club or agreement of a car free development would replace the provision of cycle parking in IN2(2)d. There appears to be no reason why cycle parking could not be provided alongside a car club and in a car free development.
- If a car-free development is proposed, it must be ensured that this would not lead to residents parking on roads outside of the development, compromising highway safety and exacerbating parking issues elsewhere.
- Opportunities for any proposed new car clubs linked to developments to be accessible to the wider existing population would be welcomed.

Policy IN3: Digital Infrastructure and Telecommunications

- High quality digital infrastructure is particularly important in rural areas such as Chobham and the policy approach is supported.
- Where new communications infrastructure is proposed for major developments, this should not be to the detriment of the network capacity for the existing community.
- It is urged that in rural areas monopoles, towers, cabinets and other equipment are of a colour, likely green or black, that blends with the surrounding area and does not create a stark and visually dominant feature.

Policy IN4: Community Facilities

- The policy approach is supported, subject to the views of the local community being given strong weight in decisions relating to community facilities, and a joined up approach taken with neighbouring boroughs in consideration of major development at Longcross Garden Village and other development in the area.
- It is suggested that post office, banking, pharmacy and convenience stores are facilities that should not be lost in addition to those listed.
- The Local Area Principles for Chobham state that community facilities in Chobham will be protected, however it is felt that a principle of taking opportunities to also increase the range of facilities could also be included, e.g. a village library.
- Any community facilities should be accessible to all residents, including people with mobility impairments.
- Access to local healthcare should be of paramount importance. With Chobham and West End GP surgeries operating in partnership, Chobham patients are often expected to travel to West End for primary healthcare services, with private motor vehicles and taxis being the only realistic option for transport. At the time of writing, the surgery in Chobham is open on weekdays between 08:00-13:00 for pre-booked appointments only, while West End surgery is open to the public weekdays from 08:00-18:30. It is suggested that improvement of healthcare availability within Chobham is included as a Local Area Principle.

- As mentioned in the response to SS3a, while it is noted that “green infrastructure” refers to both green and blue infrastructure in this plan, some other planning authorities both locally and nationally are using the term “green and blue infrastructure”. In order that Surrey Heath is not perceived to be overlooking the importance of blue infrastructure, this may be something to consider.
- It is noted that there will be a Climate Change and Green Infrastructure SPD, and the Parish Council trusts that this will be consulted on in due course.
- The Parish Council would like to see greater protection afforded to the footpath and bridleway network, and opportunities for enhancement to be maximised. Some development has had detrimental effects on rights of way, such as a tunnel effect being created by fencing, and loss of open views due to screening. The quality of Chobham's rights of way is gradually being eroded. Being able to take exercise in an attractive, safe natural environment is important for the health and wellbeing of the community, particularly in rural areas where there are limited other exercise opportunities that do not involve a car journey.
- It is felt that horse riding could be given visibility within this policy and the forthcoming SPD, with the green infrastructure network being of particular importance to horse riders, and SANGs being an area where horse riders' needs are often overlooked.
- It is felt that co-operation is vital with neighbouring authorities to ensure policy does not have the effect of enhancing biodiversity in one area at the expense of that in neighbouring administrative areas, and that ecological corridors and sustainable walking and cycling routes can be joined up.
- There is concern that any major development that creates a loss of well-connected green infrastructure would effectively wipe out smaller gains made elsewhere. It is felt that more emphasis could be placed on ensuring major development is directed away from areas rich in green and blue assets.
- The Parish Council strongly opposes the use of Common land as Suitable Alternative Natural Greenspace (SANG) and recommends that policy states that SANG cannot be land with existing public access or land that is recognised as important for nature conservation.
- The Parish Council has repeatedly raised a significant number of maintenance issues concerning the Little Heath SANG. A poorly maintained SANG is unlikely to serve its purpose and may well drive additional visitors to the SPA. Maintenance obligations should be given a high degree of scrutiny to ensure they are robust. The Parish Council supports Natural England's preference for SANGs to be handed over to local authorities to ensure that management is carried out fairly and effectively and funding is secured in perpetuity.
- It is suggested that policy could require strong justification (alongside the mandatory requirement for biodiversity net gain) for the use of artificial grass and artificial greenery at the expense of natural landscaping in areas where it is likely to be inappropriate and/or

visually intrusive, such as in Conservation Areas, listed building settings, green spaces, public parks, public gardens and other areas of green infrastructure.

Policy IN6: Green Space

- The policy approach for Green Space is broadly supported.
- The proposed additions for Chobham are welcomed.
- It should be ensured that well-equipped play areas and recreational facilities are available throughout the Borough and not only in locations with high levels of developer contributions.
- The Parish Council objects to the proposed deletion of the Green Space designation for Chobham Rugby Club. It is felt that the Green Space designation should remain, and any planning application that comes forward should be assessed against the policy, which contains an exception for re-provision elsewhere, where appropriately evidenced.
- Notwithstanding the above, a requirement set out in the SLAA is that some green space is to be retained on the Rugby Club site in any design put forward, and therefore the Green Space designation should be retained and carried forward for the relevant part of the site.
- The Parish Council has noted and supports all the suggested new Green Space allocations for Chobham, and would like to suggest the following additional green spaces for consideration:
 - Benham's Corner
 - Cannon Corner
 - Chobham Pet Cemetery
- Note: Page 33 of the Green Space Assessment 2021 refers to "Recreation Ground, Windsor Road" as a site recommended for boundary changes. This should read as the Rugby Club, not the Recreation Ground.

Policy IN7: Indoor and Built Sports and Recreational Facilities

- There is concern that it would be relatively easy for a developer to demonstrate "unviable" and "no longer a need" if insufficient investment has been made in an existing facility's upkeep and it has been neglected to an extent that customers have gone elsewhere.
- It should be recognised in policy that some closed or deteriorated existing facilities may still be viable within the same use class, if not the exact same use.

Policy IN8: Safeguarded Land for Future Transport Provision

- Not directly applicable to Chobham, but safeguarding the land is supported as important to the Borough as a whole.

Section 6: Environment

Policy E1: Thames Basin Heaths Special Protection Area

- The Parish Council has objected to the proposed 1,700+ new homes at Longcross Garden Village. It believes the development presents obvious multiple threats to Chobham Common on a scale that cannot be effectively mitigated, therefore breaching the integrity of the Thames Basin Heaths Special Protection Area. A large part of the site is also closer to Chobham Common than it is to the SANG at Kitsmead Lane, which would appear to defeat the object of the SANG. While determination of the application is not a matter for Surrey Heath Borough Council, it is urged that the Borough commits in policy to using its voice as a neighbouring consultee in such situations in order to rigorously uphold the intentions of policies such as E1.
- The Parish Council has on many occasions expressed concern regarding non-residential development within the Thames Basin Heaths Special Protection Area 400m buffer zone (Chobham Common specifically). Increased recreational pressure is highly likely from employees before and after work, during breaks (which may include smoking) and returning for leisure visits (potentially cycling and dog walking) during non-work times, particularly if their workplace includes free, convenient car parking near the Common.
- There is further concern that some types of new residential development appear to be allowed within the buffer zone, such as new staff accommodation or other ancillary habitable buildings on a residential site. Increasing the residential capacity of a site would appear to carry the same or similar risks to the SPA as a new residential unit. Clarification in this regard would be welcomed.

Policy E2: Biodiversity and Geodiversity

- The Biodiversity and Geodiversity policy approach is supported and it is noted that this will be further set out in the SPD.
- It is felt that it is worth recognising that Surrey County Council bought Chobham Common in 1968 as a public open space for informal recreation and the biodiversity value was only recognised following the introduction of the Wildlife and Countryside Act in 1981. Any policy approach should ensure that the Common's importance for recreation is not diminished.
- It was noted from an answer given at the webinar held on 28th April that a map/diagram of wildlife corridors and linkages has yet to be produced. This information would be helpful to have amongst the documentation as the Plan progresses.
- It was also noted from an answer given at the same webinar that further details of the "best and most versatile agricultural land" would likely be included as the Plan progresses, this would also be helpful information.

Policy E3: Biodiversity Net Gain

- The minimum 20% biodiversity net gain is supported. The Parish Council shares the concern of the Surrey Nature Partnership regarding Surrey's relatively high rate of biodiversity loss and extinction.

Opportunities to ensure the biodiversity net gain is of a type to help lessen the threat of local extinction would be welcomed.

- There is concern that rare habitats may be replaced by “easy wins” to achieve the requisite 20% overall net gain. While it is noted that “irreplaceable” habitats are protected (paragraph 6.29), it is felt that similar protection should be offered to rare habitats, including localised rare habitats.
- It is unclear whether any types of development will be exempt from this requirement (e.g. householder applications or applications which contain no habitats or scope for habitats).
- A requirement for any off-site delivery should be that it is local and identifiable, with “credits from a habitat bank” being an option of absolute last resort.
- The policy does not appear to set out how the biodiversity net gains will be protected over time. This is an important point to ensure that increased biodiversity is not only delivered, but maintained.

Policy E4: Pollution and Contamination

- The policy approach for pollution and contamination is supported subject to the views of neighbours and those potentially affected being given strong weight at application stage, and a robust post-development monitoring and enforcement system being in place.

Policy E5: Renewable and Low Carbon Energy Systems

- The policy approach for renewable and low carbon energy schemes is supported.

Policy E6: Flood Risk and Sustainable Drainage

- As previously raised by the Parish Council on many occasions, desk-based flood reports and assessments do not generally reflect the position “on the ground”, particularly at Philpot Lane and in other areas of Chobham prone to flooding. The “1% annual probability” is often quoted, representing a 1 in 100 chance of flooding in any given year. It is well known that the real probability of a flood event is far higher, with the flood plain becoming flooded at least annually, often for extended periods of time, and Philpot Lane itself being at least partially flooded every year, and intervals between severe flooding events being a few years at most.
- It is felt that the lived experience of residents where flooding is concerned must be given greater weight than desk studies.
- Reported flooding events should not be relied upon as being the only incidences of flooding in an area. Flooding in and around flood plain areas is rarely reported due to its frequency and because flooding in the flood plan is wholly expected as part of the nature of the land.
- The Parish Council would wish to see no raising of land levels being allowed in flood-prone areas, including no spreading of excavated land and soil.
- There are concerns that by approving basement development in flood zones, the flood plain's purpose is being compromised as this restricts

the volume of water able to be soaked up. Basement development, which appears to be becoming more prevalent, could be a separate policy topic in the Local Plan.

- It is suggested that the importance of maintaining ditches and watercourses is highlighted in development policies.

Policy E7: Landscape Character

- The introduction of a specific policy for landscape character is welcomed.
- The Parish Council is keen that development integrates with Chobham's landscape character, respecting the Common, woodlands, floodplain, agricultural land, equestrian land and open spaces.

Section 7: Green Belt and Countryside

*Policy GBC1:
Development of New
Buildings within the
Green Belt*

- The introduction of a suite of policies for the Green Belt is welcomed.
- The exclusion of unlawful and temporary buildings from assessments is welcomed. It is requested that clarification is made and examples given on what constitutes a temporary building, but trusts that the scope of temporary buildings will include structures such as sheds, log stores, treehouses, playhouses, etc.
- It is felt that structures such as fenced sports courts, which are open in nature, should not be allowed to be removed and replaced with solid buildings (provisions of general permitted development notwithstanding).
- The Parish Council supports the general guide of 30% increase, subject to design considerations and provided the existing building is not already a replacement building or part of a redevelopment which has seen a previous increase over the original built form.
- It is noted that ancillary aspects of a development proposal including outbuildings, walls, gates and areas of hardstanding are proposed to be considered under the requirements of the NPPF. It is felt that policy for Surrey Heath's Green Belt could be strengthened over the NPPF in this regard. There are an increasing number of visually intrusive gates, fencing and other built features creating closed frontages and causing a high degree of harm to the openness of the Green Belt.
- There is concern that agricultural occupancy conditions are being lifted, allowing dwellings where they would not otherwise have been allowed in the Green Belt. It is felt that greater control is required in this area, one suggestion being that applications for agricultural dwellings are only allowed for temporary accommodation for a set period of time in the first instance, and removed if the agricultural use has not been established.
- A number of applications have been received where lawful development certificates have been secured for increases greater than 30% (but not built), and this position used as special circumstances to gain additional floorspace and volume for an alternative (full planning) scheme. Policy clarification in this area would be appreciated.

- It is unclear whether the scenario outlined in 7.11 would allow buildings to stand if they are constructed under permitted development between the submission of an application and consent being given. Please could this be checked to ensure there is no loophole.
 - Paragraph 7.13 presents Chobham village as being inset within the Green Belt, however this is only a proposal at this stage and has not been through examination. It is suggested that this is made clear in the text if relevant to future iterations of the draft plan.
 - The clarification that Castle Grove, Mimbridge and Brick Hill do not constitute villages is welcomed. It is understood that Brick Hill should be two words rather than one as per maps and signposting. Please could this be double checked and amended as necessary.
 - If the proposal to inset Chobham village goes ahead, there would appear to be no justification for allowing limited infill outside of the new inset boundary as per GPC1(7). With the boundary having been recently and carefully studied, there should be no additional sites “considered to be within the village”. It is suggested that Chobham is specifically excluded from this section of the policy.
 - New buildings should also not be allowed if they are to accommodate a displaced use from the proposed or recent conversion of another building (whether the conversion was by full planning or permitted development).
 - It is felt that there could be more specific policy requirements for basement development in the Green Belt, or even a full separate policy for basement development Borough-wide as this appears to be on the increase. Concern is raised regarding basements that extend beyond the footprint of a building, therefore permanently altering the character of the land above and its potential for trees and planting. There are also flood risk considerations, and the issues arising from basement development creating a materially larger property, capable of accommodating larger numbers of residents/visitors and generating more cars and vehicular movements.
 - The redevelopment of previously developed land for residential purposes can harm the openness of the Green Belt when an increase is “double allowed”; once at redevelopment stage and again when new householders apply to extend their properties or add outbuildings. Even if permitted development rights have been removed, full planning can still be looked upon favourably either by the planning authority or at appeal (the resultant dwellings from the redevelopment being classed as the new “original buildings”). Measures to prevent this double counting, such as not allowing increases over the existing built mass at redevelopment stage, could be considered.
- Policy GBC2:
Development of
Existing Buildings
within the Green Belt*
- GBC2 (2) reads “In assessing proposals for replacement buildings”, but the policy deals with buildings for re-use and not replacement. This could be an error, but clarity would be appreciated.
 - The Parish Council would expect to see permitted development rights removed where an existing building in the Green Belt is extended or

re-used. The risk of additional buildings being constructed is outlined in 7.21, and this could apply similarly to extensions.

- The Parish Council would like to see temporary buildings excluded from calculations for extensions, the same as they are proposed for be excluded for new buildings.

*Policy GBC3:
Equestrian Uses in the
Green Belt and
Countryside Beyond
the Green Belt*

- The previous equestrian policy (DM3) required new buildings or ancillary development to be small in scale. This requirement doesn't appear to have been carried forward. There is concern that the requirement for scale to be "suitable" (GBC3(1)c) represents a weakening of policy and the term "suitable" is subjective.
- It is urged that paragraph GBC3(1)f be expanded to read: "The development is sustainably located in terms of general accessibility and in relation to the existing bridleway network and/or common land where the Right to Air and Exercise (on foot and on horseback) exists (Sec. 193 of the Law of Property Act 1925 now Section 15 of CROW 2000)."
- It is felt inappropriate for policy to include a requirement for development to "not result in the over-use or deterioration of bridleways" and this should be deleted. While it is recognised that well-used bridleways can require repair and maintenance, the emphasis should be placed on ensuring their upkeep is suitable for purpose. To draw a parallel, there are many examples of local roads becoming deteriorated through over-use by motor vehicles, and the roads are repaired and maintained.
- Chobham has a number of existing equestrian sites that are well-related to the local bridleway network. The loss of these equestrian sites by changes of use should be resisted.
- The requirement for provision of pasture to be on a case-by-case basis and in all cases in accordance with the Equine Industry Welfare Guidelines and the British Horse Society standards is welcomed.
- It is suggested that the positive role equestrian use can play in individuals' health and wellbeing is recognised as part of point 7.23, with wording such as: "Horse riding is known to improve mental and physical health as demonstrated by the charity Riding for the Disabled."

*Policy GBC4:
Development within
the Countryside*

- The policy is not directly applicable to Chobham as it relates to the countryside beyond the Green Belt, however it is noted that rural workers are covered in this section and not in the Green Belt section. It is unclear why the subject of rural workers is not covered in both sections.

*Policy GBC5:
Gordon's School, West
End*

- Not applicable to Chobham.

Section 8: Design and Heritage

Policy DH1: Design Principles

- If Chobham village is to be inset from the Green Belt, adherence to suitable and relevant design policy will become more important in order that Chobham's identity is not eroded.
- The Parish Council believes it would be appropriate to consider introducing an Article 4 Direction for Chobham's Conservation Area to ensure permitted development does not override design and heritage principles for this area, and to protect the compact central core which also serves as the main retail centre for the village. It is suggested that the preparatory work for this is carried out at an early stage, as it is understood that this may require a long notice period being given.
- It is felt that it would also be appropriate to update the Chobham village Conservation Area character appraisal, which was produced in 2001. The protection and enhancement of the historic centre is a matter of great concern to the village. The Parish Council would welcome the opportunity to be engaged with this process.
- As well as respecting rural and village settings as appropriate, it is felt that a soft transition between rural and urban is important for sites at the edge of settlements, with this being officially recognised in policy (e.g. building heights not to become higher around settlement edges, densities should not increase, and urbanising features such as hard boundary treatments should decrease).
- In the design principles for Chobham, the Parish Council would like to see a commitment to maintaining the predominant built form of 2-storey buildings with gaps for visual relief between buildings.
- Chobham's local area principles for design could include additional principles for design in areas outside of the historic centre and outside of the settlement area.
- The commitment to ensuring development within Chobham's Conservation Area reflects the historic character of the village is welcomed. It is suggested that sites approaching and adjacent to the Conservation Area should also be sympathetic in design as they form part of the Conservation Area's setting.
- It is felt that greater emphasis could be placed on ensuring site frontages, gates, fences, pillars etc. reflect local character, particularly in the rural parts of Chobham outside the settlement area which are proposed to remain in the Green Belt.
- As well as consideration of loss of daylight and sunlight, could consideration be given to loss of darkness at night in areas that are in intrinsically darker parts of the Borough?
- With the government's commitment to making "beauty" a strategic theme in planning, and its references in the Draft Local Plan, it is felt that design guides for Chobham should be produced at a very local level with input from local people to determine what is considered beautiful in development terms. This is to avoid pre-established principles of beauty ultimately leading to standardisation and a loss of

distinctiveness. The Parish Council would welcome further discussion in on this topic.

Policy DH2: Making Effective Use of Land

- It is noted that in line with the other villages in the west of the Borough, the defined Chobham settlement area has a proposed minimum net density of 30 dwellings per hectare for allocated sites. It is felt important that there is provision for some flexibility (as detailed in 8.23). As stated in the response to SS1, the Parish Council would support any opportunity to secure a reduction in the government-mandated housing figures which are felt to be unrealistically high for the Borough overall.
- The plan appears silent on the topic of backland development. The Parish Council believes backland development should be discouraged in policy, due to it being a cramped type of development disruptive to street layouts and often negatively affecting neighbouring properties.

Policy DH3: Residential Space Standards

- The policy approach for residential space standards is supported and noted to be a national standard prescribed by government.
- It is suggested that consideration be given to including relevant standards or a statement on outdoor utility space, parking space, cycle storage space and residential garden space as appropriate within this policy heading.

Policy DH4: Making Sustainable Water Use

- The policy approach for sustainable water use is supported, it is welcomed that this is recognised as a separate policy topic considering the known water stress issues in the Borough.

Policy DH5: Trees

- It is felt that it would be appropriate for the policy title to include hedges as well as trees, since the policy refers to both and the value of hedges for both their character and pollution-reducing capabilities is often underappreciated.
- It is understood that DH5(3) is aimed at ensuring that, for example, mature trees are not replaced with saplings. It would be helpful for a link to be provided to the relevant standards for biomass replacement in this regard.
- The wording “trees, hedgerows and woodland of amenity or other value” appears to be subjective. It is felt that policy should indicate that strong weight will be given to opinion at a very local level on the value of existing trees, hedgerows etc., in line with protecting aspects of the Borough that are important to local people (1.23).
- Tree lined streets, while welcomed, can be a safety issue if not appropriately designed. The needs of cyclists, pedestrians, horseback riders, people with visual impairments, users of mobility scooters etc. all need to be carefully considered when designing streets with trees. Sightlines at junctions and crossing places should not be compromised. Unobstructed verges can be critical for safety for horse riders needing refuge from the road.

- The need for measures to ensure maintenance and liability for the trees and the associated costs should also be considered at policy stage. There could also be issues with cables and underground utilities.
- Paragraph 8.43 regarding replacement planting for any pre-emptive removal of trees is welcomed. It is questioned whether it is necessary for the replacements to be of a “similar species” if the trees that have been removed were a poor or non-native choice of species to begin with and enhancements could be made.
- There are reservations about a financial contribution being sought for lost trees in some instances (8.45). It is not clear whether the financial contribution would be spent on replacement planting, and whether such planting would remain in the local area.

*Policy DH6:
Shopfronts, Signage
and Advertisements*

- It is felt that internally illuminated signage should not be allowed in Chobham’s Conservation Area (no exceptions). The wording “will not be generally appropriate” appears to allow some leeway. This is an area also requiring swift, robust enforcement due to the potential for breaches to quickly multiply if not enforced.
- The no internal illumination rule should extend to items such as LED advertising panels on shop fronts or projecting outwards from inside shop windows.
- With the increase of working from home, it is suggested that it may be appropriate to include a policy item on what signage is allowed at residential properties.
- With the mentions of “host building”, it is unclear whether this policy also includes advertisements placed in forecourts and courtyards, or on walls, gates and fencing etc. and even standalone signage. Further clarity would be appreciated on this issue.
- The design of any hoardings to be erected on construction sites should reflect the character of the area, fit comfortably within the street scene and not negatively impact upon the area's visual amenity. In rural areas and villages hoardings should not contain internal illumination or unreasonably bright external illumination.

*Policy DH7: Heritage
Assets*

- It is considered that an Article 4 Direction is likely to be appropriate for Chobham’s Conservation Area to ensure permitted development does not override policy for heritage assets in this sensitive and valued area. The Conservation Area, which has the highest concentration of listed buildings in the Borough, is already at risk of inappropriate development, and there is local concern that it may become more so if the Green Belt wash designation is removed.
- The Parish Council has engaged with Surrey County Council during the recent call for suggestions for assets to be considered for the updated Local List. In addition to the assets put forward, it is felt that there are likely to be other heritage assets which may only be recognised at a later date, such as when an application comes forward. This is recognised to some extent in paragraph 8.75, but it is unclear

what (if any) consideration will be afforded to “previously unknown” heritage assets in the planning process, which should be no less worthy of protection.

- What defines “harm” to a heritage asset can sometimes be a matter of opinion. For example some people welcome modern extensions to historic buildings, and some people think they are not appropriate. The views of local people should be given greater weight than people who do not live locally in such subjective situations.
- There is concern that heritage assets may be deliberately neglected or damaged in order that their deterioration can be a factor in a planning application, or neglected for financial or other reasons. Can anything be done at planning policy stage to try to prevent such issues?
- It has been mentioned that there may be an opportunity for Surrey Heath to prepare a Heritage Strategy based around themes such as the A30 coaching route. If this goes ahead, it is suggested that Fairoaks Airport’s contribution to the heritage of Chobham and Surrey Heath Borough could be recognised. The airport has been part of Chobham, its identity and economy for the greater part of 100 years, with heritage in its buildings, WWII connections and more.

Policy DH8: Building Emission Standards

- The policy approach for building emission standards is supported.

Sustainability Appraisal

Sustainability Appraisal

- The Parish Council has concerns on a large number of grounds about the inclusion of Fairoaks Airport as an alternative growth scenario for housing, however it agrees with this not being pursued as the preferred option.

Mapping Booklet

Mapping Booklet

- Concerns regarding the proposed Chobham settlement boundary revision (map 93) are reiterated as per the response to policy SS1. To repeat, the Parish Council believes that the following areas of the village are among those that function well against the purposes of the Green Belt and should not be inset:
 - North of 81 Windsor Road
 - The entirety of The Avenue
 - Mincing Lane north of The Avenue
 - Station Road east of the Recreation Ground
 - Any row of housing with residential gardens that back onto open fields, e.g. parts of Chertsey Road west of Green Lane, parts of Windsor (west side) and parts of Leslie Road.
- Comments regarding the Fairoaks Airport and Chobham Rugby Club boundary changes (Locally Important Employment Site and Green Space respectively) are covered in separate relevant sections in this response.

General Comments and Suggestions

General Comments and Suggestions

- The draft plan appears to give little focus to local community engagement for proposed developments. Pre-application engagement with communities is often carried out at the last minute (sometimes when an application has already been submitted) and done meaninglessly, as a check-box exercise. On at least one occasion, the views of the public were significantly misrepresented. This is a wasted opportunity that could help ensure development better meets local needs.
- The Parish Council would like to see full transparency of pre-application discussions and advice once an application has been made (unless genuinely exempt under the Freedom of Information Act).
- The Parish Council would like to see greater transparency in correspondence relating to amendments of planning permission (material and non-material), and details to comply in items such as site layouts where there is a material change to the scheme, or additional elements included.
- There is concern from residents and the Parish Council regarding a recent decision by the planning authority to not publish planning application representations from the public until the relevant planning officer has read the representations and marked them as public. This reduces transparency in the planning system, undermines trust and causes confusion as to whether representations have been seen (particularly if a determination is made prior to representations being published). It is felt that there is no reason why representations should not be made public as and when they are received, and the Local Plan should commit to ensuring transparency for the public is not reduced.
- No detail or commentary is provided regarding planning enforcement, monitoring/compliance mechanisms and consequences for breaches. The importance of a robust enforcement function in any planning system should not be underestimated. All policies in the plan, however well designed they are, can be undermined if breaches of planning regulations are not dealt with in a timely manner.
- Similarly, there have been occasions where development has been allowed to proceed with conditions that are not enforceable, or not expedient to pursue. This also undermines planning policy. It must be ensured that only robust and fully enforceable conditions are imposed, otherwise development should be refused.
- A number of the policies state that development “will be permitted” or “will be granted” (examples E2, E3, GBC1, GBC2 DH1, DH6 and more) if they meet the policy criteria, without stating that they must also meet the criteria of any other relevant policies.
- There does not appear to be a dedicated section for commenting on the Local Area Principles. The Parish Council has included relevant comments under the respective headings in this response, but it would also welcome the opportunity to have its preferences included in the

principles. Parish Councils are uniquely placed to understand, represent and be able to reflect what their respective communities want. It is felt that there is opportunity to place greater focus on local priorities identified by the local community.

- The Parish Council wishes to highlight that some 85+ people attended the Draft Local Plan drop in session at Chobham on 6th April. While this was a very well-attended session and the face to face contact was appreciated, there was concern that the date and time (early afternoon) excluded people who work outside of the village. Please could a more inclusive time, or additional sessions at different times, be considered for any future engagement.
- For future consultations, please could printed copies be officially lodged with the Parish Council and included on the list of locations. This has always been the case before, and it is unclear why this changed. Libraries at Bagshot, Camberley, Frimley Green and Lightwater are not easily accessible to all Chobham residents.
- Finally, it is felt that in consideration of the vast amount of consultation material and supporting documentation, a consultation period of 10-12 weeks would have been more appropriate, particularly as the consultation ran through the Easter and May Day holidays and was taking place at a time when many people were affected by coronavirus.

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

Yours faithfully



Ms C Cooper
Planning Administrator