

Surrey Heath Local Plan Review 2040

Scoping Consultation (deadline for responses 19 October 2026)

CHOBHAM PARISH COUNCIL REPRESENTATION

Q1 – Are there any strategic cross-boundary issues that you think the LPR needs to consider?

There are a number of cross-boundary issues that should be considered, particularly given the major development anticipated or already in progress in the wider area, some of which is very close to the Chobham boundary. Issues which have the potential to impact Chobham include highways, education, healthcare, water and sewerage, public transport, rights of way and ecological networks, including Chobham Common.

For Chobham, particular cross-boundary issues include:

- the potential for development to erode the physical separation between settlements;
- cumulative pressure on the road network and other infrastructure serving Chobham and neighbouring areas;
- impacts on Chobham Common and the Thames Basin Heaths Special Protection Area;
- public rights of way and connectivity across administrative boundaries (including the potential to extend, link or improve the quality of existing routes as supported by the August 2026 NPPF); and
- the implications of planning across the future West Surrey area, particularly where development in neighbouring areas may impact Chobham.

Q2 – Do you think the SHLP vision in Appendix 1 is still suitable for the period to 2040 and if not, how do you think it should be updated?

The Council is broadly supportive of the vision to be carried forward for the period to 2040.

It is considered that the vision could be strengthened to reflect the significant changes in the planning context since it was prepared. In particular, the commitment to retaining the distinct identity of the Borough's towns and villages needs to be supported by strong local policies, given the potential for the new national Green Belt and Grey Belt framework to place particular pressure on villages.

The reference to an overall net gain in biodiversity should also make clear that, wherever practicable, environmental gains arising from development should be delivered in the relevant local area and within Surrey Heath, rather than resulting in benefits potentially being delivered elsewhere.

The vision should identify the Borough's five Local Centres by name (Chobham, Frimley Green, Lightwater, Watchetts and Windlesham) rather than referring only to "local centres". The role and continued vitality of these smaller centres is important to the identity and sustainability of their respective communities.

With the forthcoming transition to West Surrey Council as a unitary authority, the vision should clearly set out how the distinctive identity and local priorities of the existing Surrey Heath area will be retained and represented within the new unitary authority. This is particularly important given that responsibility for progressing the LPR will transfer to West Surrey Council from April 2027.

Q3 – Do you agree with the current Strategic Objectives as the starting point for developing the Local Plan Review priorities? Are there any changes you would suggest at this stage?

The Council considers that the current Strategic Objectives provide a generally appropriate starting point and cover many of the issues which should remain priorities for the LPR. However, it is felt that there appear to be some gaps.

In particular, the objectives should include a clear commitment to protecting and enhancing the distinct identity and character of the Borough's individual towns and villages, including their different settlement patterns, relationships with the countryside and appropriate separation between settlements. This is an important element of the existing Surrey Heath vision, but is not currently reflected explicitly in the Strategic Objectives.

The objectives could also explicitly recognise:

- the importance of smaller local centres and neighbourhood parades to the sustainability and identity of individual communities;
- the role of homeworking, flexible workspace and micro and small businesses, particularly within rural areas;
- the need to protect and enhance public rights of way (including bridleways and horse riding in objectives and planning policies alongside walking and cycling); and
- the need for biodiversity and environmental gains arising from development to deliver meaningful benefits in the local area.

Q4 – Do you have any comments on the location of future development in the Borough?

Development should be directed towards locations which are the most sustainable, taking account of infrastructure capacity, accessibility, environmental constraints and settlement character. The spatial strategy should reflect realistic access to employment, services, facilities and leisure.

Public transport accessibility should be assessed by reference not simply to whether a service exists, but to its frequency, operating hours, accessibility and practical usefulness for everyday journeys. Chobham has an hourly bus connection to Woking during the day, but there is no evening, Sunday or Bank Holiday service. Other routes are very limited and largely relate to secondary education during term-time. It therefore does not provide the level of service that could reasonably be expected to support low car dependency.

The strategy should avoid relying on journey opportunities which do not reflect the real-life travel patterns of the relevant local community.

Q5 – How do you think we can embed carbon emissions reduction and climate change adaptation into the LPR?

Particular attention should be given to the circumstances of rural areas, opportunities to reduce unnecessary travel, supporting high-quality digital connectivity and homeworking, protecting appropriately located local employment opportunities, improving walking, cycling and horse-riding routes, and public transport where practical.

Due to changing guidance at national level, it appears there will no longer be a Climate Change and Green Infrastructure SPD, which was previously said to be forthcoming. Clarification would be welcomed as to whether its content will be fully incorporated into the new plan, or if not, how this will be addressed.

Q6 – Do you have any views on how the Council should seek to meet the increased housing requirement?

The very substantial increase in the housing requirement should not result in a disproportionate concentration of development in rural villages. Development on suitable brownfield and genuinely previously developed land should be encouraged over undeveloped countryside.

Distribution should be based on a transparent assessment of settlement capacity, infrastructure, accessibility, environmental constraints, separation between settlements and character.

The introduction of Grey Belt should not in itself be treated as justification for additional development in or around Chobham. The particular pressures and constraints affecting individual settlements should remain central to decisions about the distribution of growth.

The Council is also concerned that the Grey Belt approach could undermine the principal of rural exception sites. Such sites are intended to provide a mechanism for delivering affordable housing to meet genuine local needs in rural locations where market housing would not normally be permitted. If general housing development becomes more readily achievable on Grey Belt land around village edges, this could reduce the incentive to bring forward rural exception sites and could weaken the ability of the planning system to secure housing specifically for people with a local connection. The LPR should therefore consider how the approach to housing delivery can continue to support affordable rural housing for local communities, with appropriate local connection requirements, rather than allowing Grey Belt development to displace this objective.

Q7 – Do you have any comments on the types of homes that should be provided up to 2040?

The Council supports a balanced range and mix of homes reflecting local need, including smaller dwellings and bungalows, accessible/adaptable homes and homes both suitable and affordable for people seeking to downsize.

The loss of existing smaller dwellings through extensions and replacement has reduced their availability, while those remaining usually command a premium because of their scarcity. The LPR should therefore consider how policy can resist continued erosion of smaller dwellings, rather than relying solely on the requirement for new development to provide an appropriate mix.

Affordable housing should similarly respond to evidenced local need, with a strong emphasis on ensuring that housing intended to meet rural local needs is genuinely accessible to people with a well established local connection.

Q8 – Do you have any comments in relation to the scope of the Local Plan Review in relation to the provision of new homes?

Please see the answer to Q7 above which contains some relevant comments.

In considering the provision and location of new homes, the Council considers that the LPR should have particular regard to the effect of growth (including cumulative impacts from multiple developments) on the character and infrastructure capacity of existing settlements.

For Chobham, this includes:

- the cumulative impact of new development on local infrastructure and services;
- the potential effects of increasing housing density on the character of the parish and the rural setting;
- the potential for development to erode important established gaps, village edges, separation between settlements and a general loss of village identity; and
- ensuring that the drive to make effective use of land does not result in inappropriate backland development, unneighbourly development, or overdevelopment.

Q9 – In what ways can we make sure that local plan review policies support the long-term health of our town, district and local centres?

The specific characteristics of rural local centres should be recognised. The LPR should recognise that the health of a small rural centre depends on retaining both retail floorspace and a range of everyday services and active ground-floor uses.

Chobham High Street has a compact centre in which the loss of even a single retail or service unit is immediately apparent and can have a noticeable effect on vitality. Policies should therefore support retention of active ground-floor uses, resist unnecessary loss to residential or inactive uses (such as units providing an inactive frontage through window display only, or operating by appointment only, with the premises not normally open to the public), and recognise the importance of accessibility for all.

At present there is no dedicated public cycle parking facility in Chobham village, including at the High Street car park, which limits the practical ability for people to travel sustainably locally and visit the centre by bicycle for day to day needs. The provision of secure and appropriately located cycle parking in centres and neighbourhood parades should therefore be supported as a simple but important measure to encourage active travel and remove this barrier towards achieving a modal shift. Given that Chobham High Street car park is under the direct control of the Borough Council, this should be an achievable and locally significant “quick win”.

Chobham High Street is also particularly dependent on the quality of its historic environment to attract visitors and support local businesses. The Council is concerned that inappropriate advertising clutter, unauthorised external alterations to listed

buildings, intrusive or overly modern shopfront lighting, LED screens in windows and similar incremental changes are undermining the attractiveness and historic setting of the High Street. The LPR should support a strong and appropriately managed High Street environment, ensuring that commercial activity and visibility are balanced with the character and heritage of the area. Protecting the visual quality of the High Street should be recognised as contributing directly to its vitality, visitor appeal and long-term economic health.

The LPR should consider whether Article 4 Directions could be used to prevent permitted development from undermining the vitality, appearance or heritage value of important local centres such as Chobham High Street. The Council raised similar concerns in previous Local Plan consultations.

Q10 – Are there any town centre sites that you think should be identified for development including infrastructure or public realm improvements?

Chobham is not a town centre, but the Plan should recognise opportunities to improve the public realm and accessibility of its village centres alongside town centres.

Particular priorities include safe pedestrian-priority crossings on Chertsey Road and Station Road to enable continuous village centre journeys on foot without the need to negotiate these busy A-roads, and the provision of public cycle parking.

A particular issue concerning the public realm in and around Chobham High Street is mentioned in Q9 above.

Q11 – Do you have any other comments on the scope of the Local Plan Review in relation to town centre and retail matters?

The LPR should recognise the particular vulnerability of smaller rural centres, where relatively few units provide a large proportion of the community's retail and service offerings.

Policy should seek to retain active ground-floor uses and prevent the gradual erosion of centres through permitted development, inactive shopfronts or other uses which make little contribution to the vitality of the centre.

The scope of the LPR should also ensure the Chertsey Road Neighbourhood Parade's retail function is protected. This location would also benefit from a modest amount of cycle parking for local journeys, similar to that at the Gosden Road parade in West End.

Q12 – Are there places in the Borough where specific employment uses are best located?

Higher-trip and more intensive employment uses should generally be directed towards more sustainable urban or edge-of-town locations rather than sensitive rural sites with poor public transport and unsuitable road networks.

At the same time, existing rural and village-based employment locations which are well established and appropriately located should be protected, while ensuring that sensitive sites, particularly those close to residential areas, Chobham Common or other environmental assets, do not evolve into large-scale or inappropriate industrial/commercial locations.

In Chobham, particular consideration should be given to the continued role of Fairoaks Airport and its associated aviation, engineering, training and other employment uses, which are well supported by national policy, including in the context of the wider network of general aviation airfields.

Q13 – Are there any specific employment sectors or types of businesses that we should support through the Local Plan Review?

The Council considers that the LPR should recognise the importance of small-scale and flexible employment as well as conventional employment sites.

For Chobham, this includes:

- homeworking and flexible working;
- small and micro-businesses;
- appropriately located rural businesses;
- equestrian-related businesses and employment;
- specialist engineering and aviation-related employment; and
- pilot training and other activities associated with Fairoaks Airport.

Fast and reliable digital connectivity and suitable flexible workspace should be recognised as particularly important to a rural settlement such as Chobham where a significant proportion of residents work from home.

Q14 – Do you have any other comments on the scope of the Local Plan Review in relation to employment development?

The LPR should provide a clear distinction between supporting the rural economy and ensuring rural employment sites do not evolve into general industrial or dense commercial locations which are inappropriate to their setting.

The Plan should:

- protect suitable existing appropriate rural employment opportunities;
- resist inappropriate intensification or expansion of employment sites in sensitive rural locations;
- ensure that any loss of suitable employment land to other uses is properly considered and justified;
- require appropriate justification where non-rural employment uses are proposed in locations where more suitable urban or edge-of-town locations may be available; and
- consider whether Article 4 Directions may be necessary to help retain locally important employment space.

Q15 – Do you have any views on what types of infrastructure should be prioritised alongside new development?

The Council notes that SHBC intends to update its infrastructure evidence and Infrastructure Delivery Plan and work with infrastructure providers.

For Chobham, the priority is to ensure that the evidence and delivery arrangements properly reflect the specific infrastructure pressures of a rural village, including:

- the local road network and junction capacity;
- drainage and surface water management;
- water supply and wastewater infrastructure;
- secondary education and school travel;
- local primary healthcare capacity/access;
- future burial provision;
- realistic public transport provision;
- pedestrian and cycle infrastructure;
- public rights of way and bridleways (including multi-user routes); and
- accessibility improvements in the village centre, including pedestrian crossings.

The provision of appropriate community and recreational facilities should also be recognised as an infrastructure priority. The Chobham Neighbourhood Plan identifies particular local needs for facilities for children and teenagers, additional allotment/community growing space and play provision, and these should be taken into account when assessing the infrastructure requirements arising from future development. However, provision should not be dependent solely on the level of developer contributions generated in any particular location.

It is urged that both the needs of horse riders, and people with disabilities or reduced mobility are routinely given equal recognition alongside those of pedestrians and cyclists, particularly when new or enhanced routes are planned.

Q16 – Do you have any other comments on the proposed scope of the Local Plan Review in relation to infrastructure?

The Council is concerned that there appears to be an increasing trend towards financial contributions being made as a substitute for direct provision. Where development creates a need for infrastructure, services or environmental mitigation, on-site or locally delivered provision should be strongly prioritised, with off-site provision only in the most exceptional of cases. Financial contributions should not automatically be regarded as appropriate if the resulting benefit is delivered elsewhere when the impact of development is experienced locally.

Some examples include financial contributions in respect of biodiversity net gain, SANG/SAMM, transport improvements and affordable housing. The LPR should also ensure the cumulative effect of multiple developments is considered, and that where appropriate, infrastructure is phased alongside delivery.

Q17 – How can we ensure that we protect our most important natural assets alongside planning for future development?

The Council considers that this requires not only appropriate designations and assessment, but effective, well located and maintained mitigation, management and enforcement measures. In particular:

- SANG provision should be conveniently located, accessible and attractive enough to provide a genuine alternative to the SPA. There have been examples where SANG is more remote or otherwise less accessible or attractive than the protected site it is intended to draw visitors away from, potentially undermining its effectiveness.
- SANG provision should remain fit for purpose in the longer term, with robust arrangements for management and maintenance. The experience of Little Heath Meadow in Chobham demonstrates the importance of this. The site becomes waterlogged and excessively muddy each winter which makes access difficult. Maintenance has historically been poor, giving rise to multiple complaints from residents. There remain concerns that inadequate SANG maintenance is likely to be driving visitors towards rather than away from Chobham Common.

- Wildlife corridors and ecological connectivity should be identified and protected, particularly where development could sever or diminish established links between habitats. Green infrastructure should be treated as a connected network rather than a collection of isolated areas.
- Water quality should be given greater weight as part of natural-asset protection. Chobham has a longstanding local issue with discharges from Chobham Sewage Treatment Works into the River Bourne. The Neighbourhood Plan identified this as a local issue, and Environment Agency data for 2025 records 20 storm-overflow spills from the works, totalling 288 hours. The LPR should ensure that the capacity and environmental effects of wastewater infrastructure are properly considered when planning for further growth.
- The effectiveness of mitigation should be considered cumulatively and over the lifetime of development, with appropriate funding, management and monitoring secured rather than assuming that provision at the point of development will remain effective indefinitely.
- Effective enforcement is essential to the protection of natural assets. The LPR should support clear, enforceable policy requirements and appropriate monitoring so that unauthorised development, land-use changes or failures to comply with ecological and landscape mitigation requirements can be addressed promptly. The protection afforded by policy is of limited value if breaches are allowed to become lawful through the passage of time, persist over years before being addressed, or mitigation measures are not properly delivered and maintained.

Q18 – Do you have any comments on the proposed scope of the Local Plan Review in relation to the natural environment?

The Council supports the proposed scope but considers that several local issues should receive particular attention.

The LPR should provide clear and effective protection for Chobham Common/TBHSPA and should consider cumulative recreational, ecological, traffic, drainage, lighting and other impacts arising from nearby development (including from neighbouring authority areas).

The Plan should clarify how the TBHSPA mitigation requirements apply to less conventional forms of accommodation, including hotels, care homes, short-term accommodation, student accommodation, and accommodation associated with employment, so that there are no gaps or ambiguity in the treatment of additional

residential pressures. At present these appear to be taken on a case-by-case basis, with some outcomes that seem inconsistent with one another.

While the Council recognises changes in national policy concerning Biodiversity Net Gain, the Plan should seek to ensure that environmental gains are meaningful to the areas affected by development. Biodiversity and green infrastructure improvements should be delivered in all but the most exceptional cases within the relevant local area in Surrey Heath, rather than being implemented elsewhere.

The importance of public rights of way, including bridleways, should also be recognised and protected as an important part of the rural natural environment, and not solely as a form of pedestrian and/or equestrian infrastructure.

Residents' lived experience of flooding should be appropriately recognised in planning policy and decision-making. While desk-based mapping and modelling are important, they do not always capture the full extent, frequency or localised nature of flooding. Evidence from residents and other local sources should therefore be given appropriate weight and should not be discounted simply because it is not reflected in mapped flood-risk data.

Q19 – Are there any locally specific issues that would justify having local plan policies relating to land in the Green Belt or the countryside in Surrey Heath?

Policies should include clear definitions and local policies for infilling, prevention of backland development where inappropriate, and the protection of physical or visual separation between Surrey Heath's neighbouring settlements.

Rural economic and equestrian uses should continue to be supported where genuinely appropriate to the countryside, while resisting the loss of rural sites to more intensive or urban forms of development. The Council has previously raised concerns about this trend and the challenges of enforcement.

Q20 – Do you have any comments on the proposed scope of the Local Plan Review in relation to the Green Belt and Countryside?

The Council would not expect the LPR to repeat a full-scale Chobham village boundary study. The settlement boundary exercise undertaken for the current emerging Local Plan was a major strategic exercise carried out under exceptional circumstances and designed to be enduring.

The LPR should develop a clear and transparent approach to assessing Green Belt and Grey Belt land in Surrey Heath, including how land in and around villages will be

assessed, with particular attention given to the protection of village edges and surrounding countryside.

A principal concern is that Grey Belt status should not be treated as an automatic indication that land is suitable for development. Grey Belt assessments should take a genuinely spatial and locally responsive approach, having regard not only to the contribution land makes to Green Belt purposes but also to whether development on Grey Belt land would promote a genuinely sustainable pattern of development, including its accessibility, infrastructure capacity, settlement character and separation, landscape setting and the risk of coalescence. It should also be demonstrated that reasonable alternatives, including suitable previously developed and underutilised land and opportunities outside the Green Belt, have been properly considered before development is supported on Grey Belt sites.

The LPR should set out a clear, plan-level strategic approach in respect of the NPPF requirement that the purposes of the Green Belt, when taken together, are not fundamentally undermined by Grey Belt development. While individual developments may not in themselves fundamentally undermine the purposes of the Green Belt across a plan area, there is a clear risk that gradual and cumulative development may do so.

Q21 – How can we ensure that the Local Plan Review sets out a positive strategy for heritage assets in the Borough?

The Council supports a positive and proactive approach to heritage rather than relying solely on the assessment of individual planning applications.

For Chobham, this should include:

- an up-to-date review of the Chobham Conservation Area (the existing appraisal from 2001 is now dated), with which the Parish Council would welcome being involved;
- archaeological interests, including Chobham's areas of high archaeological potential, and the importance of protecting below-ground heritage assets;
- proactive consideration of buildings and features which are at risk of neglect, falling into disrepair or receiving inappropriate alterations;
- improved awareness amongst owners and applicants of heritage requirements and responsibilities; and
- proportionate monitoring and enforcement where unauthorised works adversely affect heritage assets.

Where necessary, Article 4 Directions should be considered to prevent permitted development from undermining the character and significance of the Conservation Area.

The recently updated Local List of Heritage Assets contains a substantial number of Chobham assets and should be appropriately recognised within the new planning framework, and its continuing role in identifying locally significant heritage assets should be maintained. A commitment should be reiterated to keeping this under review every 5 years as set out in the document itself.

Q22 – How can we ensure that the Local Plan Review delivers high quality design? Are there any places or sites that would benefit from setting clear design expectations?

The Council considers that Chobham is an example of a location where locally specific design expectations are beneficial. This is covered in detail in the Chobham Neighbourhood Plan.

It is important that design expectations reflect the established character of the village, including:

- the prevailing scale, pattern and grain;
- building heights that remain appropriate to Chobham's established character, with predominantly two-storey development where appropriate;
- the architectural variety found locally and materials to be in keeping with existing buildings in the immediate locality;
- the importance of gaps and openness between buildings;
- the relationship between built form and the countryside;
- soft village edges and gradual transition to the countryside rather than urbanised boundaries;
- appropriate boundary treatments for the village or rural setting;
- minimising light pollution and protecting darker rural areas;
- retaining valued established trees and hedgerows, and their appropriate incorporation into new development;
- a presumption against inappropriate backland development; and
- the setting of the Conservation Area, main approaches and protected views.

Design expectations should respond to the specific character of Chobham rather than applying generic suburban or urban design principles across the Borough.

Q23 – Do you have any comments in relation to making effective use of land and on setting density requirements?

The Council supports effective use of land but considers that density should not be treated as an objective in itself or a mandatory maximum. Higher density may be appropriate in some locations, but it should not be assumed that increasing density is

inherently preferable where this would conflict with local character or other planning objectives.

Density requirements should be sufficiently flexible to reflect the different circumstances of towns, villages and individual sites. In Chobham, density should have regard to established built form, landscape setting, infrastructure capacity, access and the need to retain gaps, gardens and openness which contribute to the character of the parish, as well as respecting neighbouring residential amenity.

The LPR should also consider whether a blanket approach to density risks encouraging the continued loss of smaller dwellings, inappropriate backland development or other unintended consequences.

Q24 – Do you have any other comments on the proposed scope of the Local Plan Review in relation to design and heritage?

The transition to the new plan-making system, and then to the new West Surrey Council, should not result in the loss or weakening of locally specific design and heritage considerations. Where existing local design guidance remains justified, these provisions should be incorporated into the LPR so that they retain appropriate policy weight, with particular care taken to preserve the distinct character of places such as Chobham.

Q25 – Are there any other issues that we should take into account in preparing the Local Plan Review?

The Council considers that the following additional matters should be taken into account in preparing the LPR:

- **Neighbourhood Plans:** The Council considers that the role of existing Neighbourhood Plans should be addressed explicitly. The LPR should build on adopted neighbourhood policies where they provide a sound locally specific basis for wider strategic policy, rather than unnecessarily duplicating or overriding them.
- **Enforcement:** The Council considers that the LPR should include a clear commitment to effective and timely enforcement. Policies can be undermined if breaches are not dealt with consistently and promptly, creating a perception of a two-tier system between those who comply with planning requirements and those who do not. The Council has raised similar concerns on a number of occasions.

- **Developer engagement:** There should be clear expectations around meaningful engagement at an early stage, including transparent pre-application processes, particularly for significant sites and proposals in sensitive rural locations.
- **Proportionate evidence:** The Council is concerned that some planning applications contain very large volumes of supporting material, sometimes running to hundreds of pages. While comprehensive evidence is important, excessive or poorly structured documentation can make it difficult for consultees and members of the public to identify the information that is most relevant. The LPR could consider how policy and information requirements can remain proportionate, clearly structured and focused on material planning considerations, with key conclusions readily identifiable and not buried.
- **Loss of SPD guidance:** The transition away from SPDs under the new system should not result in the loss of important locally specific requirements. In particular, the Residential Design Guide SPD and Thames Basin Heaths Special Protection Area Avoidance Strategy SPD are relevant to Chobham, together with the developer contributions/infrastructure guidance. These should be thoroughly reviewed and, where still justified, incorporated into the LPR rather than lost through the transition.
- **Financial contributions and local benefit:** The Council considers that the principle of local benefit should run through the Plan's approach to infrastructure and environmental mitigation. Where contributions are collected instead of direct provision, the Plan should make clear how the affected community will benefit and how delivery will be prioritised.