



CHOBHAM NEIGHBOURHOOD PLAN – SUMMARY OF REGULATION 16 REPRESENTATIONS

11.09.2025

This document is a summary of the representations received in response to the consultation on the Submission version (Regulation 16) of the Chobham Neighbourhood Plan.

The consultation period occurred between 15 July to 5 September 2025.



Name/Organisation	Neighbourhood Plan reference	Summary of representation
ADP Fairoaks Ltd and Vistry Group Plc	General	<p>Representation is submitted on basis of collaboration agreement between the two parties, relation to redevelopment of Fairoaks Airport for a new settlement.</p> <p>Range of appendices relating to the proposed site development, including a Vision document for new settlement of 1,600 homes, employment uses, primary school, local centre, gypsy and traveller pitches, sports hub and SANG. Built development would be solely located on 49ha of Previously Developed Land.</p> <p>Recognises that Fairoaks airport allocation would be at Local Plan, rather than Neighbourhood Plan level. Therefore, the representation seeks to ensure the Neighbourhood Plan does not preclude or prejudice any allocation being included in SHBC's emerging Local Plan.</p> <p>NPPF 2024 refers to grey belt and the Chobham Neighbourhood Plan (CNP) will be assessed against this version of the NPPF.</p> <p>A case is set out for Fairoaks site being 'grey belt'.</p> <p>The CNP is suggested to be premature in its production, in relation to the sequencing the plan in relation to the Local Plan. It will be difficult for the CNP to be in general conformity with strategic policies, given timing of new Surrey Heath Local Plan. As such, CNP should not progress to adoption until conclusion of the Local Plan examination and modifications consultations have concluded.</p> <p>The CNP fails to support NPPF's overarching objectives to achieving sustainable development, in particular economic growth and strong, vibrant communities. There is an opportunity at Fairoaks airport to support expansion of the economic area beyond that identified as a 'Major Developed Site in the Green Belt' (see CH8 policy comments).</p> <p>The Neighbourhood Area Profile (March 2023) fails to recognise the Fairoaks Airport site as a substantial previously developed site.</p> <p>The Parties would be happy to meet to discuss the representations with the Neighbourhood Planning Group and how development proposals at Fairoaks Airport could meet priorities of the local community listed in policy CH16.</p>



Name/Organisation	Neighbourhood Plan reference	Summary of representation
ADP Fairoaks and Vistry Group	CH1	Need to ensure CNP does not preclude development coming forward in SHBC's emerging Local Plan, hence the parties are supportive of criterion 2e of the policy CH1. The need for allocation in the CNP should await further progress with the emerging SHBC Local Plan.
ADP Fairoaks and Vistry Group	CH2	The estimated housing need for the area, in particular affordable housing and smaller homes (market and affordable), is greater than the number of dwellings that is proposed to be provided in the area. The Parties have no specific comments to make in relation to the policy wording itself, however consider that the Land at Fairoaks would enable a greater housing mix and more affordable homes to be provided in line with draft Policy CH2, especially if Land at Fairoaks Airport is deemed to be Grey Belt and 50% affordable housing is required.
ADP Fairoaks and Vistry Group	CH3	Fairoaks Airport site lies within the 'rural hinterland' character area but the site is not reflective of the characteristics described in the assessment. Policy CH3 criterion 2 should be amended to provide greater flexibility. Suggested wording for amendment " <i>Development proposals should conserve and, where practicable, enhance the character of the Conservation Area or Character Area in which it is located, unless the proposal is located on land that does not reflect those particular characteristics</i> "
ADP Fairoaks and Vistry Group	CH4	Local plan-makers should not propose energy efficiency targets that go beyond current and proposed national building standards, particularly without well-reasoned and robustly costed rationales which meet a number of objectives including: viable development, and considering the impact on housing supply and affordability in accordance with the NPPF. Any additional requirement must be expressed as a percentage uplift of a dwelling's target emissions rate, calculated using a specified version of the standard assessment procedure. The policies should be flexibly applied where the applicant can demonstrate that meeting the higher standards is not technically feasible.



Name/Organisation	Neighbourhood Plan reference	Summary of representation
ADP Fairoaks and Vistry Group	CH8	Reference to representation submitted on Local Plan, which argues for removal of Fairoaks Airport site from the Green Belt. Site owner's interest is to reinvest and repurpose the employment site to provide opportunities in digital technology, film and media output. Positive discussion have been held with British Film Commission. Rep claims Policy CH8 mimics Policy ER3 of SHBC submission Local Plan which does not remove the Strategic Employment Site at Fairoaks Airport from the Green Belt. The majority of tenants at the site are not predominantly related to the aviation sector. There is no need to link the function of the Strategic Employment Site to the wider function of the site.
ADP Fairoaks and Vistry Group	CH10	Greater clarity is required in the CNP and evidence base with respect of SANG provision. Land at Fairoaks would provide up to 57 hectares of SANG which is not recognised in the CNP.
ADP Fairoaks and Vistry Group	CH12	Objection to inclusion of locally significant view 8 over Fairoaks as a Locally significant view; this view should not be included, so as not to preclude development at the site.
ADP Fairoaks and Vistry Group	CH14	The Fairoaks proposed settlement includes walking, cycling and equestrian opportunities, with routes proposed through the site and to Woking.
ADP Fairoaks and Vistry Group	CH16	The Fairoaks proposed settlement includes community facilities and many of these align with priorities listed in the policy's supporting text.



Name/Organisation	Neighbourhood Plan reference	Summary of representation
Chobham Poor Allotment Society	Policy CHI I	<p>The charity objects to the allocation of two sites as Local Green Space; Broom Lane site and Red Lion Road site. This is further to rep at Regulation 14 stage in 2024.</p> <p>The charity does not have a charitable objective to provide allotments. The objectives of the charity relate to wider social and educational objectives for parish residents.</p> <p>The proposed allocation of the land as Green Space would be a restriction on the organisation's ability to make decisions about use of the use of the land for charitable purposes.</p> <p>The charity will not ensure the land is managed in line with the policy aim, therefore the designation is not deliverable.</p> <p>The justification of the allocation, in relation to the criteria of the NPPF is challenged, as it is claimed that the site does not meet the policy test of 'demonstrably special'.</p> <p>Some parts of the sites are private gardens. As a whole, the objector says the sites have no public access and serve no recreational purpose.</p> <p>The designation as 'Local Green Space' is seeking to set a higher level of protection, than the 'Green Space' allocation proposed in the Surrey Heath Local Plan (2019-2038) to be examined in September 2025. Any reliance on designation by the Local Plan is premature and also the site areas differ in the Neighbourhood Plan vs the Local Plan.</p> <p>There is limited and diminishing demand for allotments in the area of Chobham.</p>



Name/Organisation	Neighbourhood Plan reference	Summary of representation
Historic England (HE)	General – historic environment	<p>Welcome the production of the neighbourhood plan and are pleased to see that the historic environment of the Parish features throughout. No detailed comments are given on the Plan but general advice and guidance is provided including reference to the NPPF, PPG, and guidance notes produced by Historic England. Historic England notes that the NPPF requires Plans, including Neighbourhood Plans to set out a positive strategy for the conservation and enjoyment of the historic environment and that the strategy should as a minimum, safeguard those elements of the neighbourhood that contribute to the significance of heritage assets.</p> <p>It is noted that neighbourhood plans should be based on clear objectives and a robust evidence base and provide an opportunity to designate Local Green Spaces and Assets of Community Value.</p>
Kingsbury Investment and Development Group	-	<p>General support for policy approach of CHI in relation to location of development, but the policy could be more explicit about the status of ‘grey belt’ land in the development management process. Grey belt opportunities can contribute to housing supply. Only reference to grey belt in Neighbourhood Plan relates to Green Belt review process, as part of Local Plan making, but not in relation to applications coming forward in context of NPPF December 2024.</p> <p>Amendment requested to policy CHI criterion 2(a) to add in reference to ‘utilisation of grey belt land’.</p>



Name/Organisation	Neighbourhood Plan reference	Summary of representation
National Grid Electricity Transmission (NGET)	General – electricity transmission	Identify NGET assets within the neighbourhood area comprising an overhead transmission line route and notes that there are no known new infrastructure interactions within this area. The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. Changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. NGET requests that the Council is cognisant of the above.
National Highways	General – M3 motorway	Have reviewed the plan and have no comments to raise.
Natural England (NE)	General – natural environment	Provides general advice on natural environment information sources and issues to consider. Recommends that advice is sought from local ecological, landscape and soil advisors. Confirms that NE does not have any specific comments on the draft neighbourhood plan.



Name/Organisation	Neighbourhood Plan reference	Summary of representation
Network Rail	General – railway network	<p>Notes there is very little interaction between the Neighbourhood Plan (NP) Area and the railway.</p> <p>The Plan identifies Longcross station as close to the Chobham NP area, however it should be noted that although rail services have increased (since Longcross Studios development), Network Rail highlights that further improvements to the station itself and the access are still required.</p> <p>Few residents within the NP area are likely to cycle to any of the stations (Longcross, Brookwood, Sunningdale or Woking) which are all outside of the NP area. Expect that residents will continue to be most likely to drive and park in order to access the rail network.</p> <p>It is suggested for the Steering Group/ Parish Council could ascertain which stations Chobham residents drive to, as this would be useful for Network Rail to inform station car parking future provision and/or enhancing non-car access routes.</p>
Peter Fitzsimmons	Basic conditions and conformity with Development Plan	<p>Submission document should not be dated 'February 2025' since the document was submitted in June 2025.</p> <p>Comments are made on the conformity with the strategic policies of the Development Plan, in particular which Local Plan (adopted or examination) this should be.</p> <p>The rep suggests that the Neighbourhood Plan should make housing allocations.</p>
Peter Fitzsimmons	Policy CHI	<p>Policy should incorporate grey belt guidance contained in the NPPF 2024.</p> <p>Suggested modification to policy CHI to add in clause to support land identified as grey belt to be considered ahead of other Green Belt land for development.</p> <p>Otherwise, the Plan does not comply with Basic Condition A.</p>



Name/Organisation	Neighbourhood Plan reference	Summary of representation
Peter Fitzsimmons	Policy CH2	Policy for affordable housing is very prescriptive/overly rigid and concern that this may conflict with viability and supply. References to paragraph 66 and 67 of the NPPF and the PPG on viability. CH2 should be simplified and made less prescriptive, without fixed high percentages on all sites. Self-build is encouraged by the NPPF, but policy CH2 does not refer to this and policy should be amended to include self-build.
Peter Fitzsimmons	Policy CH5	Policy should be updated to state that applicants must take account of the latest information from national government organisations. Policy could be more outcome-based rather than prohibitive.
Peter Fitzsimmons	Policy CH10	Requirement for over national requirement of 10% may conflict with legislation. Target requirement, if higher than national 10% target, should be ' <i>where feasible</i> '. Policy should acknowledge statutory exemptions in national legislation, such as <i>de minimis</i> , householder and self-build exemptions. Not following national minimum target, nor referencing the exemptions means the policy does not conform with Basic Condition A.
Ryan Coomer	General	Poses a series of questions relating to the overall approach of the Neighbourhood Plan, in relation to the plan's vision, community engagement and addressing the varying social, economic and environmental needs of the area and potential for partnership working for delivery of the plan.
Ryan Coomer	CH11	Details of family ownership of Chobham Pet Cemetery are provided. Would like the Chobham Pet Cemetery to remain undeveloped. [Chobham Pet Cemetery is designated as a Local Green Space in the neighbourhood plan].
Surrey County Council	General – Development plan context	Paragraph 1.8 should list documents in relation to Minerals and Waste planning, with three documents detailed in the representation.



Name/Organisation	Neighbourhood Plan reference	Summary of representation
Surrey County Council	CH3	Figures 9 and 10 (maps of character areas and other built heritage assets) use the out of date archaeological data; this should be updated via consulting Surrey Historic Environment Record.
Surrey County Council	CH5	CH5 criterion 3 is suggested to be amended in relation to the scale and nature of development which SuDS should be required for, along with other minor amendments. CH5 criterion 4 is suggested to have text added in relation to requiring confirmation from the sewerage undertaker confirming capacity is available with no detrimental impacts. CH5 criterion 5 is suggested to be expanded with addition of text about existing watercourses not being culverted. Suggested modifications to paragraph 5.33 and 5.41, regarding reference to Surrey County Council and link to published advice on Ordinary watercourse consents.
Surrey County Council	CH10	Note that at the time of making the rep, a consultation draft of the Local Nature Recovery Strategy (LNRS) has been published. Suggestion for additional text relating to scenario of off-site Biodiversity units and signposting to mapped measures in the LNRS, to inform Biodiversity Gain plans.
Surrey County Council	CH11	Objection to the designation of 'Wishmore Cross Academy field' and 'Playing Field west of High Street' as Local Green Spaces. The reason given is that education land is fully protected under statute and is not open space that is fully accessible to the public. If the sites are retained as Local Green Spaces, request for policy to allow for exceptions, such as school expansion on playing field, where this would be most sustainable option.
Surrey County Council	CH14	Rights of Way Improvement Plan h has been published and should be included at paragraph 8.12. Policy should be amended to require EV charge points in accordance with SCC's Parking Guidance, not just as per Building Regulations.



Name/Organisation	Neighbourhood Plan reference	Summary of representation
Surrey Heath Borough Council	General - support	Welcome the opportunity to comment and are pleased to see that a number of comments made at Reg 14 have been incorporated into the Plan.
Surrey Heath Borough Council	General	A number of references to the Regulation 18 Local Plan could be updated to reflect the most recent version of the Local Plan, and a number of links to evidence have been superseded (for example in relation to the Flood Risk Assessment (Policy CH5).
Surrey Heath Borough Council	Policy CH1	A number of minor wording changes are suggested to provide greater clarity to the decision maker and applicants, including making clear whether all or one of the criterion in Criteria 2 must be met. It is also noted that there are inconsistencies with the proposed Chobham settlement boundary set out in the Regulation 19 Local Plan.
Surrey Heath Borough Council	Policy CH2	Comments are made as to whether the 50% discount for First Homes has been viability tested; suggest there is no need to reference the national minimum of 30% of First Homes, and seeks further clarity on the reference to allocations criteria.
Surrey Heath Borough Council	Policy CH3	Further clarity sought between the reference to valued views in this Policy and the views referenced in Policy CH12.
Surrey Heath Borough Council	Policy CH4	Suggest that reference to financial viability should reference 'viable' not 'unviable'.
Surrey Heath Borough Council	Policy CH5	Some conflict with the Local Plan identified as to whether capacity in the local sewerage system should be identified at the point of determining the planning application or through later planning conditions.
Surrey Heath Borough Council	Policy CH6	Minor wording to reference the Development Plan suggested and deletion of Emmetts Bridge as an example of being proposed for inclusion on the Local List having regard to previous feedback from the Parish Council.



Name/Organisation	Neighbourhood Plan reference	Summary of representation
Surrey Heath Borough Council	Policy CH7 and Appendix D	Further clarity sought on whether the proposed Appendix D relates to retail or employment premises and whether it relates to viability or marketing. Potential inconsistency with Policy CH6(4) in relation to historic buildings raised.
Surrey Heath Borough Council	Policy CH8	Inconsistency with the Regulation 19 Local Plan identified as Highams Park is identified as a Strategic Employment Site and not a Locally Important Employment site in the emerging Local Plan. Some consequential amendments to the Policy and the Policies Map are sought.
Surrey Heath Borough Council	Policy CH10	Concern raised that the requirement for offsite Biodiversity Units to be prioritised within the Parish is an unreasonable expectation given the complex requirements involved in setting up and monitoring 'habitat bank' sites. Inconsistency with the NPPF identified with regards to the approach to veteran trees, and the justification for the requirement for the retention of all hedgerows is questioned.
Surrey Heath Borough Council	Policy CH11	The Council notes that representations to the Regulation 19 Local Plan from Chobham Poor Allotments Charity advised that some parts of the Broom Lane Allotments have no public access.
Surrey Heath Borough Council	Policy CH14	Minor word change proposed for clarity and incorrect map referencing queried.
Surrey Heath Borough Council	Policy CH15	Concern is expressed regarding the introduction of local parking standards which would provide higher levels of parking than those in the Surrey County Council standards and the impact of this on the streetscape, and inconsistency with Policy CPI4.
Windlesham Parish Council	General	Welcome the publication of the Chobham Neighbourhood Plan and commend the work undertaken and the commentary on flood risk which is a significant local concern in the area.



Name/Organisation	Neighbourhood Plan reference	Summary of representation
Windlesham Parish Council	General parking comment	Note that while the Plan offers limited support for development, it does not adequately address the parking challenges within Chobham village centre. Further emphasis on sustainable transport and localised parking solutions would enhance the Plan's overall effectiveness and community benefit.
Windlesham Parish Council	Policy CHI	The Parish Council particularly supports Policy CHI, point 2(f), which seeks to protect the Green Belt.

