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Dear Sir/Madam,

**Surrey Heath Borough Council’s response to Surrey’s draft Transport Plan for 2022 to 2032 and beyond.**

Thank you for the opportunity to comment on the Surrey’s draft Transport Plan for 2022 to 2032 and beyond. This letter is the Council’s formal response.

Surrey Heath Borough Council has had the opportunity to consider proposals and has the following comments to make.

**Overarching general comments**

Overall, the vision and four overarching objectives are welcomed and supported. The Council recognises the need for a radical step change in approach to transport planning to reduce carbon emissions and address climate change and air quality in Surrey. The complexity and scale of the challenges that the Plan aim to address are recognised, and it is noted that joint working will be key to delivering the Plans ambitions.

Whilst the Council does not disagree with the intent of the plan and welcomes its ambition, it does cover a scope that goes far beyond ‘transport’ and relies significantly on other bodies to deliver its aspirations. As such, it is unclear if the plan in its entirety is realistic and deliverable in the ten-year period of the plan. For example, within the Planning for Place Policy Area, reference is made to redesigning areas into 20-minute neighbourhoods. Whilst the Council supports the principles of 20-minute neighbourhoods, it is uncertain how this could be achieved county wide given the reliance on landowners, developers and local authorities. Similarly, the proposal to relocate parking and increasing charges in the demand management for cars Policy Area would need the support of local authorities to deliver.

Consequently, the Council suggests that there needs to be greater emphasis on the role of partners in delivering measures in LTP4 which will require significant funding and political buy in. As part of this, more detail is required on where funding for delivering the Plan will be derived, including greater consideration to how grant funding opportunities can be optimised. Furthermore, it would be helpful for a more detailed evidence base at a District and Borough level to better highlight the challenges and opportunities in the county, rather than the relatively high-level policy review that has been published as part of the evidence base for the Plan. The

Council therefore suggests that Surrey County Council procures its own detailed research to support the evidence base for LTP4.

Upon reviewing the Plan, it is clear that delivering the package of measures will be particularly challenging in Surrey Heath. It is noted that Surrey Heath has the highest percentage of commuting by private vehicle, the highest percentage of private vehicle ownership by household and highest rate of cars per household in Surrey. Surrey Heath likewise has limited access to rail transport and very limited cycle route networks compared to other areas of the County, especially in the rural areas to the east of the Borough. Furthermore, Surrey Heath has an ageing population, with the age group of 75+ are expected to increase by 72% up to 2040<sup>1</sup>. As identified in LTP4 on page 20, travel demand from this growing age group is set to increase with a trend towards a more active retirement and, for rural areas especially, this means greater use of the private car.

As such, it will be inherently challenging to reduce car dependency in the Borough and improve the uptake of public transport and more active modes of transport, given the existing infrastructure necessitates the use of private vehicles for many in the Borough. Consequently, it is evident that in Surrey Heath specifically, detailed work is required to deliver the step change set out in LTP4. It is the Council's position that more detailed measures will be required to enact behavioural changes towards more sustainable modes of transport and delivering the measures of LTP4 in Surrey Heath will need to take account of the complex local context.

With regard to the Impact Strategies section of the Plan, it is noted that in the that Planning and Place strategy will also support economic growth by facilitating the ongoing growth of Surrey's valuable economic clusters, such as the Surrey Research Park, for instance ensuring that land for expansion is made available. Another key role will be planning for additional housing development to help alleviate the current affordability challenges and improve the options for essential workers living in Surrey. For Impact Strategy 4, the Council strongly supports the need for a quality of life strategy to address air quality issues and help to support residents to live healthy, active lives.

Surrey County Councils intention to work collaboratively with Districts and Boroughs, stakeholders, partner organisations, local groups, businesses, communities and residents to deliver the LTP4 and jointly achieve our ambitious objectives is welcomed.

## **Comments on the nine proposed Policy Areas**

### **Planning for Place**

The Council welcomes the principles of this Policy Area and supports the delivery of 20-minute neighbourhoods, especially given the need to consolidate services for Surrey's aging population and the wider range of benefits they bring, including improved air quality. However, more detail is required as to how this can be implemented and addressed holistically, especially in relation to redesigning existing urban, suburban and village areas. Based on the information included in LTP4, it is not clear how 20-minute neighbourhoods can be realistically provided across the county through redesigning neighbourhoods.

With regard to the quick wins identified for this Policy Area, the Council seeks further clarification on the criteria that will be used for implementing walking and cycling schemes that are forecast to be well used. Whilst the logic behind progressing the most likely to be used routes is understood, this could lead to further geographical discrepancies across the county, improving existing networks but leaving areas with limited coverage without adequate provision, further engraining the use of private vehicles and associated behaviours in such areas.

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<sup>1</sup> Surrey Heath Housing Needs Study 2020

Another quick win identified in this section of the plan is the introduction of 20 mph zones and traffic management as default on roads identified to have a strong 'place' function in the street family categorisation. Further detail is required on this action to understand its implications and the locations where it will be applied.

### **Digital connectivity**

The Council welcomes the principles of this Policy Area and supports work to raise awareness of online opportunities, activities, and services to maximise their use and reduce the need to travel. However, it is essential that residents who need to access services through more conventional means are able to do so.

### **Active travel/personal mobility**

The Council welcomes the general principles of this Policy Area and supports improvements to routes and facilities for cycling. However, there should be a greater emphasis on implementing significant improvements to cycle infrastructure in areas of the county that have limited coverage. Cycle infrastructure in Surrey Heath is notably limited, especially in the more rural eastern areas of the Borough, and the Council would welcome increased dialogue with Surrey County Council on how improvements can be achieved in Surrey Heath. Improving cycle infrastructure within villages of Surrey Heath is identified as a key priority by the Council.

The Council regularly receives feedback from residents, including as part of the recent Five Year Strategy Consultation, that there are very few easy and safe cycle routes for travelling within and outside the Borough. A key opportunity, for example, would be improving cycle links between Surrey Heath's eastern villages, such as Chobham and West End, to the extensive cycle network in and around Woking. This is a common suggestion in feedback that the Council receives from residents living in the east of the Borough. It would also be helpful to have a better understanding of the cycle plans that are proposed and will be implemented across the county, and what specific improvements are likely to be delivered over the course of the Plan. The provision of cycle routes where users are not competing with vehicles should be made a priority in the delivery of an improved cycle network in Surrey.

The Council welcomes the commitment in LTP4 to take the opportunity to build green infrastructure such as new tree planting into any new and improved cycle routes.

### **Public/shared transport**

The Council welcomes the general principles of this Policy Area but notes that significant improvements would be required in Surrey Heath to make this deliverable in the Borough. The Council regularly receives feedback from residents, including as part of the recent Five Year Strategy Consultation, that there is a limited choice of travel options in the Borough and that public transport links are relatively limited compared to other areas.

Whilst the Council benefits from relatively frequent bus services in Camberley and other areas of the Borough, there are a number of areas where options for bus travel are very limited, including for Windlesham and Chobham. Improving public transport services to the distinctive village communities in the east of Surrey Heath is identified as a key opportunity by the Council. Moreover, improvements are required to bus travel in and out of the Borough, especially into Hampshire and Berkshire. It is recognised that any new or additional services will need to be viable, but it should likewise be recognised that promoting behavioural change through improving the experience of bus travel, including the costs per journey, are key factors for residents to make the choice to travel by bus. Moreover, consideration will need to be given to how positive behavioural change towards increased bus use would be factored into viability assessments.

In respect of rail travel, Surrey County Council will be aware that rail services in Surrey Heath are limited to Frimley, Camberley and Bagshot. It is noted that the rail strategy identified a

number of priorities, including the adequacy of rail access to London from Camberley, Bagshot and Frimley given the poor level of service and relatively long journey times. However, it is also noted that the Camberley Rail assessment 2016 found no short-term options for improving services with a positive business cases. As such, it is uncertain as to the role that rail travel will play in increasing the uptake of rail travel in Surrey Heath. The Council strongly advocates that the provision of faster and more direct train services from Frimley, Camberley and Bagshot to London would significantly increase the uptake of rail services in the Borough and contribute to reducing the need to travel by car. The Council recently responded to the South Western Railway Timetable consultation for December 2022 expressing its concerns about the current inadequacy of rail services into the Borough and in particular the need for a direct and reliable service into central London.

Furthermore, the Council notes that there is limited reference to rail services on the periphery of the county or improving access to services in periphery locations, which for Surrey Heath represents an opportunity to increase access to services to London and Reading. For example, there are a number of frequent services in the Blackwater Valley, Brookwood Station and Woking that are on the periphery of Surrey Heath. Improved transport links to these locations from within Surrey Heath, for example shuttle bus services and high-quality cycle paths, would significantly improve access for Surrey Heath residents and help contribute to a modal shift away from personal vehicle use. For most residents in Surrey Heath wanting to access frequent services to London, it is easier to drive to a station outside the Borough with a faster and direct service to London than cycle, bus or change from the Guildford to Ascot service. For example, for Camberley residents going into London, it is quicker to drive to Farnborough train station and get a direct service to London Waterloo, rather than use the limited direct services from Camberley to London.

It is noted that there should be a more explicit focus in the Plan on improving disabled access to public transport and active transport in Surrey, contributing to improved accessibility for all.

### **Demand management for cars**

The Council recognises the benefits of the approach proposed in the Policy Area and welcome the suggestion that measures will be tailored to specific locations and be applied in conjunction with other Policy Areas. The Council notes that residents and businesses will benefit from the reduced congestion and improved reliability due to reduced traffic levels associated with demand management for cars. Traffic congestion is regularly identified as a key issue in feedback the Council receives from residents, including as part of the recent Five Year Strategy Consultation, and it is recognised that measures to reduce congestion improves road safety and reduces emissions of carbon and local pollutants.

However, the Council will not be able to support specific measures in this Policy Area for Surrey Heath until genuinely reliable and accessible alternatives are in place prior to implementation of measures to deter and impede car usage. As such it is the Council's view that great care needs to be taken in the implementation of this Policy Area, ensuring high quality alternatives are available before measures such as reduced parking in urban locations is implemented, relating to the points made in the general section of this response.

One area of concern is the potential impact that the proposed demand management measures could have on the viability and vitality retail centres, as well as the local economy in general, especially if the same approach isn't adopted in areas bordering Surrey. For many of the retail centres in Surrey Heath, such as Camberley Town Centre or Bagshot District Centre, the majority of visitors (both from within and from outside the Borough) travel by car and make use of practically located Council car parks. Without significant improvements to public transport and active travel links, as well as a step change in the travel behaviour of residents, footfall could be impacted significantly should demand management measures be introduced in these areas. Detailed and evidenced business cases would need to be produced for introduction of measures that could have a significant impact on local retail centres and the local economy.

The Council recognises that, on page 80, that is noted that *'whilst concerns are often raised that reducing parking provision and increasing its cost will have negative economic impacts for urban centres, evidence suggests that this does not occur in practice. Research by organisations such as Transport for London and Living Streets indicates that traffic free pedestrianised environments are more attractive to visitors; and that those visiting a town centre by modes other than car are likely to spend more in a month, as they will visit the centre more often and are more likely to make additional unplanned stops whilst passing'*. However, detailed local evidence will be required to confirm that a similar trend would be experienced in Surrey, especially in specific areas like Surrey Heath where car dependency is the highest in the county.

The Council would suggest that, to ensure equitability and make other forms of transport more attractive in the short term, the short-term focus should be on reducing the costs of public transport and access to active travel networks, rather than increasing the costs of car travel. In Surrey Heath, implementing measures such as reduced parking without the alternatives in place could increase local inequalities and decrease access to services.

Moreover, the issues associated with demand management for cars is inherently complex and thought needs to be given to how this relates to the increased use of electric vehicles and car sharing. For example, consideration needs to be given to how those using electric vehicles and/or car sharing schemes are not adversely affected by demand management schemes for private vehicles. Some measures would be difficult to enforce and reliant on local authorities, such as managing parking charges based on fuel type for each vehicle, or how an allowance of a limited number of visits to a centre could be enforced.

### **Demand management for goods vehicles**

The Council generally welcomes the proposals for this section but notes that greater emphasis should be applied to the potential for urban consolidation hubs for local deliveries.

### **Efficient network management**

The Council notes the proposals for this Policy Area and seeks further details on how this relates for planning for new homes in terms of transport infrastructure provision, especially in areas like Surrey Heath where access to more active modes of transport in some areas of the borough remains limited. Furthermore, there should be a greater focus on using network management processes that are environmentally friendly and more focused efforts on areas that have poorer air quality. The Council welcomes the commitment for maintenance approaches to take full account of LTP4 Environmental Policies and supports taking opportunities to green infrastructure such as tree planting.

### **Promoting Zero Emission Vehicles**

The proposals for this Policy Area are generally supported. It is the Council's view that a primary short-term focus should be the expansion of on-street electric vehicle charging in Surrey. It is noted that, to date, Surrey Heath has not been included in pilots for on-street charging installation and Surrey County Council's position regarding on-street charging needs to be made clear to reflect net zero emission targets. Given the high rates of car dependency in Surrey Heath, the provision of adequate electric charge point infrastructure in the Borough will be a key element of achieving carbon reduction objectives.

### **Supporting Behaviour Change**

It is noted behavioural change is potentially one of the greatest supporting measures to delivering a step change and will be critical to delivering LTP4. Whilst this is a common theme throughout LTP4 and is afforded its own Policy Area, at this stage the measures included in LTP4 are too vague to deliver the significant step change in behaviour that will be required. Moreover, it will be essential for the successful delivery of behavioural change measures that

genuinely reliable and accessible active travel and public transport alternatives are in place prior to implementing measures to support reduced car usage. Further work is required, working with partners, to develop a detailed strategy for behavioural change in Surrey that takes account of local specificities.

Surrey Heath trusts that these comments will be taken into account in the development of the Draft Local Transport Plan.

Yours faithfully,

Cllr McClafferty  
Leader of Surrey Heath Borough Council