

Regulation 18 Surrey Heath Draft Local Plan

The following tables set out a high level summary of the key issues or themes raised to the two Regulation 18 consultations carried out in 2022 and a summary of the changes that have been made in response.

Table 1: Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) Regulation 18 consultation March – May 2022

Summary of key issues raised	Changes made to the Local Plan
Section 1: Introduction and Context	
Vision and Objectives	
<p>There were comments of support for the Vision and a number of the objectives. Other comments sought changes including:</p> <ul style="list-style-type: none"> • additional reference to maintaining a national network of general aviation; • greater reference to the role of Fairoaks Airport, particularly in delivering economic growth, but also comments promoting the site for a new settlement; • references to electric vehicle infrastructure and to being in the top 5 best places to live; • improvements to the vision for Camberley Town Centre; • greater recognition of the role of the natural environment in reducing the effects of climate change; • More explicit reference to the needs of an ageing population. <p>Comments also suggested that there was not a positive approach to economic growth or meeting housing needs, and that all development needs should be met.</p> <p>Some comments considered that the housing quota was unrealistically high.</p> <p>A number of comments promoting new sites were also made against this section.</p>	<p>A number of minor changes are made to the Key Challenges and some updates have been made to the Context section.</p> <p>Reference to affordable housing has been added into Objective A and Objective B has been reworded to relate to economic development more widely.</p> <p>The part of the Vision relating to Camberley Town Centre has been updated to reflect the Corporate Town Centre Vision agreed by the Property Investment Working Group. Reference to the LEP has been removed.</p>
Section 2: Spatial Strategy	
Policy SSI: Spatial Strategy	
<p>There were comments of support for the approach to the location of new development and the focus for development in the west of the Borough as well as comments including:</p> <ul style="list-style-type: none"> • Hart District Council confirmed commitment to delivering 41dpa of unmet need from Surrey Heath; 	<p>In response to comments a number of changes have been made:</p> <ul style="list-style-type: none"> - Further amendments to the settlement boundary at Chobham - Removal of Longcross employment area from the Green Belt

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<ul style="list-style-type: none"> • Concern at the level of development in the villages; • Comments on the removal of Chobham village from the Green Belt including concerns about its removal and also suggested amendments to the settlement boundary; • Comments that the plan period should be longer and challenges to the timetable in the LDS; • Promotion of individual sites for development including Fair Oaks for a new settlement and related requests for changes to Green Belt boundaries and comments that there are exceptional circumstances with the Green Belt not being an absolute constraint; • Challenges to the housing requirement suggesting that it should be higher, but also local support for a lower requirement; • A higher housing requirement is justified through worsening affordability levels; • Challenges to different sources of supply including windfalls, the buffer and delivery from town centre sites; • Challenges to SLAA assumptions of capacity on individual sites; • Question the robustness of the evidence base; • Insufficient recognition of the ageing population; • Questions whether the duty to co-operate has been met; • Request for rewording reference to the Housing Market Area; • Comments that significant levels of flatted developments will not meet housing needs; • Concerns about reliance on key sites at Mindenhurst and Camberley Town Centre; • Requests for a specific Policy for Fair Oaks to support aviation uses and the need for greater recognition of the value of Fair Oaks to general aviation; • Request for removal of Longcross employment area from the Green Belt to be consistent with the part of the site in Runnymede; • Comments on Strategic and Locally Important Employment sites including the 	<ul style="list-style-type: none"> - Minor amendment to references to the HMA <p>A number of changes have been made to the housing allocations in Policy HA1 and the Policy and supporting text to SS1 has been updated to reflect the updated SLAA 2023 and the latest completion figures. Supporting text has also been updated to reflect the Employment Land Technical paper update, 2023 and the phasing out of LEPs.</p> <p>The LDS has been updated with a revised LDS adopted in March 2024. The timetable for the preparation of the Local Plan has been extended but the Plan period has remained the same.</p> <p>The housing requirement remains based on the standard method with unmet need to be met from within Hart District as agreed through their adopted Local Plan.</p> <p>Some changes have been made to the designation of Employment Areas as set out in response to other Policies. The part of Longcross employment area in Surrey Heath has been removed from the Green Belt.</p>

Summary of key issues raised	Changes made to the Local Plan
<p>need for greater emphasis on economic growth and site specific employment site comments;</p> <ul style="list-style-type: none"> • Should be greater focus on the east of the Borough/SANG capacity a constraint for the west of the Borough; • Inconsistent with the Windlesham Neighbourhood plan. 	
Policy SS2: Presumption in Favour of Sustainable Development	
<p>Some comments of support. Other comments objected or commented on the policy, making a range of detailed points including:</p> <ul style="list-style-type: none"> • concerns at the impact of prior approvals, • concern at the level of housing required, • not meeting the tests of soundness, and • the need to protect tree and flood zones and require solar panels and electric vehicle charging points. 	<p>Some minor changes made to the supporting text have been made for clarity.</p>
Policy SS3a: Climate Change Mitigation	
<p>There was general support for the approach to climate change and the requirement for Health Impact Assessments. Other comments included:</p> <ul style="list-style-type: none"> • clarification over 'green and blue' infrastructure; • the need to be aligned with Building Regulations; • consistency with national policy; • a requirement to show where materials are sourced, a request for greater detail and strengthening of some requirements; • specific reference to Fair Oaks; • identify additional needs for electricity generation; • greater emphasis on ecology and encouraging wind turbines. 	<p>Changes have been made to strengthen requirements for net zero development. A number of minor changes to the Policy and supporting text are made to reflect some of the comments made.</p>
Policy SS3b: Climate Change Adaptation	
<p>There was support for this Policy. Comments raised matters including:</p> <ul style="list-style-type: none"> • the need to recognise the role of the natural environment; • the need for certain adaptive measures to also be maintained; • the need for technology to catch up • the need to align with Building Regulations; and • the need for further detail on Severe Weather Management Plans. 	<p>Minor changes to the Policy or text are made in response to the representations including an additional criterion and supporting text relating to areas at risk of wildfires.</p>
Section 3: Housing	

Summary of key issues raised	Changes made to the Local Plan
Policy HA1: Site Allocations	
<p>Comments were received from a number of statutory consultees supporting the approach to allocations, and providing detailed comments raising matters including:</p> <ul style="list-style-type: none"> • Pleased to see fluvial flood risk has been considered; • Pleased to see the approach to heritage assets; • Promotion of specific sites, and comments regarding the retention of the library; • Site specific concerns; • Welcome sight of further evidence; <p>Other comments raised by respondents included:</p> <ul style="list-style-type: none"> • the relative merits of allocating particular sites for development, often expressed in relation to requests to allocate alternative sites; • concerns raised with particular sites that are allocated for development, in relation to the desirability, deliverability, traffic impacts and potential design and density of sites; • concerns raised with regard to the under-provision of specialist accommodation for the ageing population; • concerns raised with regard to the presentation of the information within Policy HA1; • the allocation of sites below the 25-dwelling threshold; and • challenging the Green Belt status of land at and adjoining Heathpark Drive. <p>A number of comments were made by the development industry regarding the approach to the housing requirement as being too low, and to perceived challenges in delivery. There were also challenges to the findings of the evidence base such as the Green Belt review. Other representors commented that the proposed housing requirement was too high.</p> <p>Some comments challenged the reliance on sites in Camberley Town Centre and the level of flatted developments and their contribution to meeting housing needs. It was also felt there was</p>	<p>The majority of the new sites proposed by representors are located within the Green Belt. The Council does not consider that exceptional circumstances exist to release land from the Green Belt for the purposes of residential development.</p> <p>Sites that currently benefit from planning permission have been removed from the site allocations policy, and a list of site allocations comprising development sites with identified capacities between 10 –24 new homes (gross) has been added.</p> <p>Amendments have been made to a number of site capacities and new sites included as part of the updated SLAA process, information from planning applications and pre-application discussions and Reg18 representations.</p> <p>Additional site allocations are made at St James House, Camberley; Land off Spencer Close, Frimley Green (former safeguarded transport site); Land At Loen, Deepcut; and 61 – 63 London Road, Camberley.</p> <p>A separate site allocation has been created for land at Portesbury School – this was previously part of the allocation under Policy HA3 Land East of Knoll Road.</p> <p>A new Policy (CTC4) has been added allocating Land east of Park Street, Camberley (formerly allocated for housing) for a mix of uses. This is no longer a proposed housing allocation.</p> <p>An additional criterion has been added to relevant site allocations requiring the consideration of biodiversity at an early stage in the planning process.</p>

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<p>inadequate regard paid to the Windlesham Neighbourhood Plan and general concerns about the impact of proposed new development on the villages in the Borough.</p>	
Policy HA2: London Road Block	
<p>Comments welcomed the intention to regenerate the site and commented that the existing site was underperforming in a number of areas. Comments were positive with regard to the comprehensive redevelopment of the site and its likely impacts on the wider regeneration of Camberley Town Centre.</p> <p>Some comments questioned:</p> <ul style="list-style-type: none"> • the proposed maximum height of buildings at up to 15 storeys in certain places, • the bulk, scale and massing of the development being too intense, and • the projected phasing of the development and its delivery of new homes; • Traffic impacts; • The SANG solution for this site. 	<p>Further masterplanning and viability work has been undertaken on this site. This supports allocation of 550 (gross) new homes on the site.</p> <p>Having regard to the findings of the Local Plan Viability Assessment, 2024 an amendment has been made to the level of affordable housing to be provided from 40% down to 20%.</p> <p>A number of changes have been made to streamline the Policy and supporting text to avoid duplication and to ensure appropriate flexibility.</p>
Policy HA3: Land East of Knoll Road	
<p>Comments generally welcomed the allocation of the site, as part of the broader regeneration of Camberley.</p> <p>Other matters raised included:</p> <ul style="list-style-type: none"> • challenging the proposed amount of residential dwellings that could be accommodated; • questioning the over-reliance on flatted development in the spatial strategy (but in particular through the allocation of sites such as this); • questioning the impact of the Theatre on new development, and • concerns at the potential loss of Camberley Library, the Theatre, and the multi-storey car park; • concerns at access at Hillside. <p>Surrey County Council sought discussions regarding the potential retention of the library on the site.</p>	<p>The part of the site covering land at Portsebury School has been separated into a new Site allocation under HA1 as the County Council are bringing this site forwards in advance of the remainder of the site.</p> <p>Further masterplanning and viability work has been undertaken on this site. As a result the capacity of the site has been reduced to 340 new homes.</p> <p>Having regard to the findings of the Local Plan Viability Assessment and specific viability work for this site an amendment has been made to the level of affordable housing to be provided from 40% down to 25%.</p> <p>A number of changes have been made to streamline the Policy and supporting text to avoid duplication and to ensure appropriate flexibility.</p>
Policy HA4: Mindenhurst	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • Additional reference to early liaison by developers with Thames Water; • noted the site is in Flood Zone 1; 	<p>No changes are made to this Policy. Some updates to the supporting text are made to reflect the stage that the site has reached in construction.</p>

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<ul style="list-style-type: none"> the site should not be an allocation as it has permission; identified the need for links to Camberley Town Centre; and sought consideration of a new M3 access junction before development is approved 	
Policy H5: Range and Mix of Housing	
<p>Broad support for a balanced range and mix of housing to meet local needs. Matters raised included:</p> <ul style="list-style-type: none"> The threshold to provide self build plots should be raised from 20 to 40 or more dwellings; 5% self build is not justified; Class C2 extra care housing should be exempt from H5; Policy is not deliverable though the reliance on flatted development; Need viability and other evidence to ensure the policy is deliverable; and, Enhanced accessibility standards should be tested. 	<p>Some changes have been made to streamline the wording of the Policy.</p> <p>Text amended to clarify self build requirements and identify that plots may not be provided if justified by site characteristics or viability.</p> <p>Some amendments to the Policy have been made to clarify the requirements for homes to meet Building Regulations.</p> <p>The mix of housing sought as set out in the supporting text has been updated to reflect the Local Housing Needs Assessment 2024.</p>
Policy H6: Specialist Housing	
<p>Support for the policy with other matters raised including:</p> <ul style="list-style-type: none"> Questions the effectiveness of the Policy, should include specific needs; Need clarity on Use Class C2 and how it applies to various forms of specialist housing; Given the level of unmet need, extra care and other C2 uses should be enabled; Concerns about the number of care homes in certain locations; There should be reference to other forms of supported living, not just for older people; and, Affordable housing should not be sought. 	<p>The Local Plan Viability Study has assessed specialist housing on various sites, including the potential provision of affordable housing. As a result, an additional Policy criterion has been added into the Policy regarding the requirements for affordable housing.</p> <p>The Policy has also been updated to better reflect the typologies of specialist housing and supporting text updated to reflect evidence from the Local Housing Needs Assessment, 2024.</p>
Policy H7: Affordable Housing	
<p>Supportive comments that the Borough needs affordable housing with other matters raised including:</p> <ul style="list-style-type: none"> Affordable housing should not apply to Use Class C2/specialist housing/need to specifically test through the viability assessment; More housing sites should be allocated so that more affordable housing is delivered; No viability evidence to justify 40% affordable; 	<p>The Local Plan Viability Study, 2024 has assessed the viability of affordable housing on a range of site typologies and as a result some amendments to the Policy have been made. The Viability Study supports the retention of a requirement for 40% affordable housing other than where otherwise stated in site allocation policies or where the site is located in Camberley Town Centre and is for fully flatted development.</p>

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<ul style="list-style-type: none"> • More First Homes should be sought to meet the needs of first time buyers; • Question the delivery of affordable housing needed based on the nature of the spatial strategy; • Criteria should be more flexible; • Total housing figures should be increased to deliver more affordable housing. 	<p>Reference is also added to Policy H6: Specialist Housing.</p> <p>The supporting text has been updated to reflect the findings of the 2024 Local Housing Needs Assessment and some changes have been made to the tenure mix that will be sought.</p>
Policy H8: Loss of Housing	
Support for the policy with other matters raised suggesting there should be stronger support for the retention of single storey homes due to the older demographic.	No changes to Policy or text.
Policy H9: Rural Exception sites	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • Support for small sites for people with a local connection and engaging with parish councils; • Adding affordable accommodation for gypsies and travellers not meeting the PPTS definition; • Allowing market housing will help to facilitate delivery/although also some support for it only to be sought in exceptional circumstances; and, • The local housing needs assessment should be robust. 	Additional text has been added to enable the use of rural exception sites outside defined rural settlement boundaries for affordable pitches for Gypsy and Travellers. Supporting text indicates that Gypsy and Traveller rural exception accommodation may be provided on Council-owned small, suitably located sites in rural areas.
Policy H10: First Homes Exception sites	
No comments received.	No changes
Policy H11: Gypsies, Travellers and Travelling Showpeople	
<p>Support for SHBC assessing traveller accommodation needs.</p> <p>Matters raised included:</p> <ul style="list-style-type: none"> • Insufficient pitches allocated to meet the identified needs, additional sites should be allocated; • Windlesham is an unsustainable location; • Sites need independent access routes, not via development sites; • Detailed comments on the layout/requirements on sites; • Comments on sites considered through the site identification process; • New sites should be identified in the west of the borough and avoid over concentration of pitches in one area with a number of comments concerned at the concentration within Chobham and Windlesham; 	<p>Introductory text has been revised to set out the Council's current position in respect of its Gypsy and Traveller needs.</p> <p>Text has been rationalised, re-ordered and in some cases criterion/Paragraphs have been removed to improve readability and address concerns regarding whether some of the requirements set out at R.18 could be demonstrated through the planning application process.</p> <p>New criterion have been incorporated confirming that development should not dominate the nearest settled community and that demand placed on local infrastructure should be accommodated within existing or planned infrastructure. A further criterion has been added that relates</p>

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<ul style="list-style-type: none"> • Plan does not meet the full definition of Gypsy and Travellers; • Sites should be set away from the settled community; and, • Pitches should be included in strategic development sites. <p>A number of local authorities responded setting out that they are unable to assist with meeting any unmet needs and raising some concerns about cross boundary impacts if needs are not fully met.</p>	<p>specifically to requirements for Travelling Showpeople Yards.</p> <p>Main policy text has been updated to incorporate reference to very special circumstances and to clarify the cases in which larger developments will not need to provide Gypsy and Traveller or Travelling Showpeople provision.</p> <p>Supporting text has been updated to set out how the consideration of very special circumstances will be made in more detail and how the occupation of sites will be conditioned.</p>
Policy HI2: Site Allocations for Gypsies, Travellers and Travelling Showpeople	
<p>Objections from local groups and numerous local residents. Concerns include:</p> <ul style="list-style-type: none"> • Loss of/impact on public footpaths/bridleway; • Loss of SANG; • Loss of trees, wildlife habitats and green corridor; • Detrimental impact on character and surrounding properties; • Increase in noise and air pollution; • Pressure on road network and infrastructure; • Access issues; • Loss of community facilities 	<p>Updated to remove Diamond Ridge Woods, Camberley, Bonds Drive Extension, Chobham and Broadford Lane, Chobham as allocations, following more detailed feasibility work.</p> <p>Swift Lane is retained as an allocation for 5 additional pitches with updated criteria.</p>
Section 4: Town Centres, Retail and Economy	
Policy CTCI: Camberley Town Centre	
<p>There were comments of support. Other matters raised included:</p> <ul style="list-style-type: none"> • seeking recognition of the need for improvements to other centres; • seeking increased emphasis on mixed use developments; • concerns that significant numbers of flatted developments will not meet future housing needs; • concern that there is no certain SANG solution; • support for relocation of the Theatre so long as no loss of quality or capacity; and, • additional reference is made to stakeholder engagement. 	<p>Some minor changes to the Policy and text have been made to provide greater clarity and to include further reference to stakeholder engagement.</p> <p>Reference has been added to supporting proposals in the Surrey Heath LCWIP.</p>

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Policy CTC2: Primary Shopping Area	
There were comments of support for this Policy.	Minor wording updates are made to improve clarity and provide factual updates.
Policy CTC3: Movement and Accessibility	
<p>Comments supported this Policy, with other matters raised including:</p> <ul style="list-style-type: none"> • seeking improved transport links with the villages; and, • suggestions that recent public realm improvements had not improved the experience for pedestrians. 	<p>Minor wording updates are made to improve clarity and provide factual updates. Reference has been added to supporting proposals in the Surrey Heath LCWIP.</p>
Policy ERI: Economic Growth and Investment	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • the need to update the evidence-base to reflect the Covid-19 pandemic; • the addition or removal of specific key sectors set out under criteria (3) including adding aviation and film and television industries; • requests for the removal of the Longcross site and Fair Oaks employment area from the Green Belt. • The promotion of mixed use developments and greater flexibility; • Concerns that the Plan was not positively prepared in relation to employment needs; and the need for additional employment land. 	<p>The supporting text has been updated to reflect the updated Employment Land Technical Paper 2023 and Employment Capacity Study 2023, which takes account of impacts of Covid-19 pandemic and takes account of the contribution of recent permissions towards supply position.</p> <p>An additional criterion has been added regarding support for new employment uses outside the defined Employment areas.</p> <p>Longcross is to be removed from the Green Belt.</p> <p>Minor wording updates are made to improve clarity and provide factual updates, including the transfer of LEP functions to SCC and the updated Surrey Heath Economic Development Strategy.</p>
Policy ER2: Strategic Employment Sites	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • The redesignation and amendment of sites including Knoll Road, Longcross and Fair Oaks Airport; • Many designated sites are close to main rivers and there is no evidence that additional employment floorspace can be acceptably accommodated having regard to the constraint of flood risk; • Promotion of a site in Admiralty Park for employment use; • The need to update the employment evidence to reflect the current market and future demand; • promotion of Watchmoor Park for regeneration. 	<p>Having regard to the allocation of St James House, Knoll Road, as a housing site (Policy HAI) and the impact on the character of the Camberley Town Centre Strategic Employment Area this designation has been deleted.</p> <p>Longcross is retained as a Strategic Employment site but removed from the Green Belt.</p> <p>Fair Oaks Airport and Chobham Business Centre has been redesignated from a Locally Important Employment site to a Strategic Employment site. An additional paragraph has been added in the supporting text</p>

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<p>Concern was also raised about the impacts of additional development on roads in Windlesham, especially combined with the impact of Longcross.</p>	<p>regarding the role of Fairoaks as a general aviation airport.</p> <p>Mytchett Place is redesignated from a Strategic Employment Site to a Locally Important Employment Site.</p> <p>Additional analysis has been conducted to take account of the extent to which potential employment growth areas lie within flood risk zones, demonstrating that many opportunities are not within the functional floodplain (FRZ3b). A new Policy relating to Watercourses has been included (Policy E7) which gives additional support to addressing flood risk including within employment areas.</p>
Policy ER3: Locally Important Employment Sites	
<p>In addition to comments ER1 and ER2 above, there was general support for the aims of the Policy protecting employment uses on these sites, with other matters raised including:</p> <ul style="list-style-type: none"> • some concerns at the effectiveness of the Policy in achieving this overall aim; • concerns that it was not positively prepared; • seeking the re-designation of Fairoaks as a strategic employment site; • the need to protect sites from conversion to residential; • the specific importance of maintaining a national network of general aviation airfields should be recognised; and • concerns that the Policy did not specifically protect Fairoaks for airport use. 	<p>Minor changes are proposed to this Policy which are the redesignation of Fairoaks Airport and Mytchett Place outlined above in Policy ER2.</p> <p>In relation to flood risk concerns referred to in Policy ER2, the designated employment area within the SC Johnson (Locally Important Employment site) site has been amended, to include a larger area of the site to provide greater scope for addressing flood risk concerns in any future redevelopment of the site.</p>
Policy ER4: Yorktown Business Park	
<p>Comment received promoting a site at Admiralty Park with suggested amendment to policy wording.</p>	<p>Policy has been renamed to include Watchmoor Business Park.</p> <p>Some amendments to the supporting text reflecting the updated evidence base have been made as well as text recognising the designation of this site in the Surrey Waste and Minerals Local Plan.</p>
Policy ER5: Rural Economy	
<p>Matters raised included:</p>	<p>Some minor word changes are made to Policy ER5 to clarify the need to protect rural character and to better define local</p>

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<ul style="list-style-type: none"> strengthening the Policy to ensure protection of rural character and local amenity; concerns regarding the introduction of inappropriate employment uses and the impacts of matters such as traffic, noise and light pollution; reference to the value of equestrian development to the economy; reference to previous issues of enforcement; reference to employing only local workers in unsustainable locations; and concerns regarding the loss of rural businesses to residential use. 	<p>amenity as well as strengthening the justification for new buildings.</p>
Policy ER6: Frimley Park Hospital	
<p>Comments were received supporting the principle of the allocation with other matters raised including:</p> <ul style="list-style-type: none"> a request that either through an amendment to this Policy or a new Policy support is given for additional healthcare facilities to be provided on other sites in the catchment; Flexibility is sought regarding the need to balance technical requirements against the Borough's health infrastructure requirements; and, Wording sought supporting development proposals where they reflect the likely future demands of Borough residents. 	<p>Additional wording has been added to the Policy and supporting text regarding support for healthcare facilities elsewhere in the Borough and making minor amendments to the wording for technical requirements. The criterion relating to biodiversity net gain has been deleted as this is covered elsewhere in the Plan.</p> <p>Additional supporting text has been added regarding the announcement that FPH will be part of the new Hospitals Programme.</p>
Policy ER7: Edge of Centre and Out of Centre Proposals	
Comments of support were received.	No changes
Policy ER8: District and Local Centres	
<p>Comments of support were received as well as other matters raised including:</p> <ul style="list-style-type: none"> concerns regarding the impacts of permitted development and the need for Article 4 Directions; the need to ensure premises are accessible; Objection as it doesn't support delivery of a local centre at Fair Oaks; and comments on specific centres including the redesignation of Windlesham to a Neighbourhood Parade. 	<p>An additional criterion has been added setting out how applications within the Primary Shopping areas will be considered.</p>
Policy ER9: Neighbourhood Parades	
Support for the Policy as well as:	No changes

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<ul style="list-style-type: none"> • concern regarding the impact of permitted development; • the need to include cycle parking; and • disappointment there was nothing more specific for Heatherside Parade. 	
Policy ERI0: Old Dean	
No comments were received to Old Dean Policy.	Some amendments to improve clarity in relation to the Thames Basin Heaths Special Protection Area have been made to the supporting text.
Section 5: Infrastructure	
Policy IN1: Infrastructure Delivery	
<p>Comments of support with matters raised included:</p> <ul style="list-style-type: none"> • additional text sought relating to phasing and developer engagement with Thames Water; • a new Policy sought on wastewater infrastructure; • Comments outlining the impacts on health provision and seeking financial contributions from all housing developments where S106 agreements apply; • Site specific comments on infrastructure capacity issues including highway issues; • General concerns about existing infrastructure capacity across the Borough and insufficient new provision alongside new developments; • The need for greater emphasis on cycling and walking routes; • Updates to the Infrastructure Delivery Plan sought to reflect the allocation of Fair Oaks; • Comments on wording on education provision; • the need for phasing; and • reference to the Government's proposed changes to S106 and CIL. 	<p>Amendments to the Policy and supporting text have been made regarding phasing and wastewater infrastructure. Following comments from Surrey County Council the paragraph relating to education infrastructure has been reworded. The supporting text relating to the Infrastructure Levy has been updated to reflect the latest position.</p>
Policy IN2: Transportation	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • Some suggested additional document references; • the need to consider rail accessibility and capacity; • the need for greater emphasis and delivery of improved cycle and pedestrian infrastructure; 	<p>A number of minor changes are made to supporting text including adding reference to recent Building Regulation changes for electric vehicle charging, and additional references to Surrey County Council documents as well as reference to other users such as horse riders.</p> <p>An additional Policy criterion has been added to reflect the need to support</p>

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<ul style="list-style-type: none"> • concern regarding the impacts of development on specific places including Windlesham and Chobham; • the need to reflect equestrian needs; • the transport benefits of development at Fair Oaks; • comments regarding electric charging points including the need to reflect changes to Building Regulations; and • concerns at grid capacity. 	<p>improvements identified in the emerging Surrey Heath Local Cycling and Walking Infrastructure Plan.</p> <p>Text has also been updated to reflect the adoption of the Local Transport Plan.</p>
Policy IN3: Digital Infrastructure	
<p>Support for the Policy with matters raised included;</p> <ul style="list-style-type: none"> • highlighting the importance of high-speed broadband access in rural areas; • needing to ‘future-proof’ the policy as technologies may change over the lifetime of the plan; • ensuring that new communications infrastructure does not detriment the network capacity for the existing community; and • ensuring that new telecommunications infrastructure is designed well. 	<p>In the light of new Building Regulation requirements relating to the delivery of high speed digital connections to new homes criterion 2 of the Policy has been deleted and the Policy and supporting text updated accordingly.</p>
Policy IN4: Community Facilities	
<p>Support for the Policy with matters raised including:</p> <ul style="list-style-type: none"> • the addition of a separate policy or SPD for public houses; • the need for more detailed requirements for permitting a change of use; • concerns over existing capacity; • support for increased facilities; and • for views of the local community to be given strong weight. 	<p>Minor wording amendments to criterion I to strengthen wording on opportunities for multifunctional community facilities. The supporting text has also been updated to reflect comments from infrastructure providers in preparing the Infrastructure Delivery Plan (2024).</p>
Policy IN5: Green Infrastructure	
<p>Support for the Policy with matters raised including;</p> <ul style="list-style-type: none"> • Suggestions to include specific definitions for blue infrastructure; • The requirement for a strategic approach to green infrastructure; • The need to reflect equestrian needs; • Concerns and questions relating to the provision of SANG; and, • Concern over potential for major development to negatively impact existing green infrastructure networks. 	<p>Introductory text has been amended to reflect latest guidance from Natural England. Wording has been strengthened in criterion 2 of the policy to require development proposals to demonstrate new and enhanced green infrastructure.</p> <p>Following the introduction of the Green Infrastructure Framework, launched by Natural England in January 2023, a new paragraph has been added to the supporting text to provide an overview of the framework and its key components.</p>

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	<p>Supporting text has been amended to remove unnecessary text and provide clarity on types of areas that contribute to green infrastructure.</p> <p>It has also been updated to include reference to the Local Nature Recovery Strategy and the list of references to relevant Local Plan evidence base removed, noting that the list is not exhaustive and will likely develop during the Plan period.</p>
Policy IN6: Green Space	
<p>Support for the Policy with matters raised including;</p> <ul style="list-style-type: none"> • Request for acknowledgement of exceptions to Policy IN6, giving the example of school expansion into playing fields; • strongly encouraging the Council to undertake a new Playing Pitch Strategy; • Objection to the proposed deletion of the Chobham Rugby Club Green Space designation; • Suggestion that Lion Park Sports Ground should not be allocated. • Broad support for the majority of sites proposed for allocation; • Suggestions for sites to be either added or amended to include a different site area; • Request for greater protection afforded to the footpath and bridleway network, and opportunities for enhancement to be maximised. 	<p>Minor amendments made to improve clarity and a new criterion added to identify the need for development proposals to provide appropriate open space in accordance with adopted standards. Supporting text is updated to note that an updated Playing Pitch Strategy has been prepared and also note that new open space should also support and enhance the existing rights of way network.</p>
Policy IN7: Indoor and Built Sport and Recreational Facilities	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • suggested policy wording updated to make clear that a robust assessment is relied upon in determining that there is no longer a need for the existing facilities. 	<p>Policy wording has been amended to make clear that a robust assessment is relied upon in determining that there is no longer a need for the existing facilities. Minor amendments made to the supporting text.</p>
Policy IN8: Safeguarded land for future Transport Provision	
<p>Representations were received from the beneficiaries of the covenant on this land suggesting that no scheme is deliverable drawing on evidence from the 2016 Camberley Rail Assessment.</p>	<p>The allocation as safeguarded land for future transport use has been deleted and the site is now allocated for housing in Policy HA1.</p>

Summary of key issues raised	Changes made to the Local Plan
<p>Network Rail also responded confirming that they have no intention to implement any scheme as it is not feasible and identifying proposals to construct a footbridge over the railway at this point.</p> <p>Other comments supported the retention of this safeguarding for future rail improvements.</p>	
Section 6: Environment	
Policy E1: Thames Basin Heaths Special Protection Area	
<p>Comments of support with matters raised including:</p> <ul style="list-style-type: none"> • insufficient SANG would be a soundness issue for the Plan and further work is needed before adverse effects on the TBHSPA can be ruled out; • Comments on the approach to development in the 400m buffer zone; • Concerns raised on the impacts of development at Longcross; and, • general queries on SANG capacity and the promotion of sites for SANG or with a SANG element. 	<p>No changes have been made.</p>
Policy E2: Biodiversity and Geodiversity	
<p>Support for the Policy with matters raised including:</p> <ul style="list-style-type: none"> • the Policy could be more positively worded; • suggest add reference to 'enhancing'; • the need to ensure Policy is supported by up to date evidence; • the need to add reference to the forthcoming Local Nature Recovery Strategy. 	<p>Some minor changes to the Policy and text have been made to add clarity including reference to the Local Nature Recovery Strategy and new text noting that all aquatic habitats should be treated as priority habitats.</p>
Policy E3: Biodiversity Net Gain	
<p>General support with matters raised including:</p> <ul style="list-style-type: none"> • general concern and objection from developers that the standard should not be higher than the national requirement of 10% and associated concerns with viability; • support for the 20% requirement; 	<p>Additional text added to supporting text to justify the policy in terms of need, deliverability of local offsite compensation and viability of development. Additional requirement for offsite site gains to be delivered in line with hierarchy of proximity to site.</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • detailed comments on the provision of BNG; and, • further detailed clarification by representors on a number of points. 	<p>Supporting text has been updated to reinforce this and make reference to the Thames Basin Heaths National Character Area. A number of other minor changes have been made for the purposes of clarity and alignment with national legislation and new Planning Policy Guidance. Additional references to the Local Nature Recovery Strategy.</p> <p>Minor amendments to Policy wording to provide clarity on the 20% net gain requirement and on long term management of net gains as well as additional links to other wider Strategies.</p>
Policy E4: Pollution and Contamination	
<p>Support for the Policy with matters raised included:</p> <ul style="list-style-type: none"> • the need for a robust system of monitoring in relation to air quality; • the need for an Air Quality Assessment to be made before detailed comments can be provided; • provision of an Air Quality Statement for Fair Oaks showing development at the site is achievable in compliance with national policy; • concerns about pollution and air quality in Windlesham; 	<p>A new policy criterion is introduced to clarify that planning obligations will be used to secure contributions to tackle poor air quality and/or for air quality monitoring, to assist with funding monitoring and enforcement.</p> <p>Additional text has been added to strengthen the requirement for an assessment of possible impacts, as well as a new criterion for major developments to provide a Demolition and/or Construction Management Plan. A number of other minor changes have been made for the purposes of clarity.</p>
Policy E5: Renewable and Low Carbon Energy Systems	
<p>Support for the Policy with matters raised including:</p> <ul style="list-style-type: none"> • the need to test the Policy as part of the Whole Plan Viability assessment; • queries relating to the thresholds; and • Not positively formulated and is unsound; 	<p>Amendments made to require major development proposals to meeting the 25% requirement against the developments regulated operational energy needs. Supporting text amended to strengthen wording on the importance of delivering renewable energy.</p> <p>Supporting text updated to set expectations for the provision of an Energy Statement for major development detailing how renewable energy generation has been optimised. A number of other minor changes have been made for the purposes of clarity.</p>
Policy E6: Flood Risk and Sustainable Drainage	
<p>Support for the Policy with matters raised including:</p>	<p>Text amended throughout policy to reference all sources of flooding.</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • Detailed comments and suggested wording changes from statutory consultees, mainly seeking to strengthen the wording and providing greater clarity on requirements; • General concerns that residents' experiences of flooding were not being considered as part of the process; • Concerns that desk based assessments do not reflect the situation on the ground; • Seeking a policy preventing the culverting of main rivers; and • concerns raised with basement development and greater emphasis sought on surfaces to be absorbent. 	<p>Policy text strengthened and additional text added relating to restoring areas of functional floodplain and creating green infrastructure opportunities.</p> <p>Further requirements added to identify opportunities for Natural Flood Management and new basement development.</p> <p>A number of wording changes to policy and supporting text following feedback from the Environment Agency and Surrey County Council.</p> <p>In response to representations from the Environment Agency regarding the inclusion of a new rivers Policy a new Policy is added to the Plan (Policy EN7: Watercourse and Water Quality).</p>
Policy E7: Landscape Character	
<p>Support for the Policy with one objection raised:</p> <ul style="list-style-type: none"> • Objection as landscape character is already protected by other designations. 	<p>No changes are made.</p>
Section 7: Green Belt and Countryside	
Policy GBCI: Development of New Buildings within the Green Belt	
<p>Support for the Policy with matters raised including:</p> <ul style="list-style-type: none"> • More clarification should be provided on issues such as temporary buildings, agricultural dwellings, very special circumstances, basements and permitted development fall back positions; • Tighter restrictions should be placed on the re-development of previously developed land and infill development; • Infill development should not be acceptable beyond the suggested reviewed Chobham Village boundary; • Specific comments about the assessment of land parcels in Windlesham; • How the 30% figure should be applied is unclear; • Object and consider that some of the wording is inconsistent with the NPPF; • Consider that there are exceptional circumstances which warrant an 	<p>The 'materially larger' percentage set out in supporting text has been lowered from 30% to 15% and clarity has been provided in respect of how "materially larger" should be assessed.</p> <p>A new paragraph has been introduced to reflect that in order to be assessed against the 'substantial harm' test for the redevelopment of previously developed land, schemes would need to demonstrate the need for the affordable housing and would be expected to comply with the affordable housing requirements set out in Policy H7.</p> <p>A number of other changes to the supporting text have been made for clarity and a new Paragraph introduced to address buildings to support habitat management for nature recovery.</p>

Summary of key issues raised	Changes made to the Local Plan
<p>alteration to Green Belt boundaries; and,</p> <ul style="list-style-type: none"> • Green Belt boundaries should be revised to enable housing delivery. 	
Policy GBC2: Development of existing buildings within the Green Belt	
<p>Policy supported with matters raised in the representations received include:</p> <ul style="list-style-type: none"> • Further emphasis should be placed on the removal of permitted development rights; • Clarification that temporary buildings should be excluded from calculations sought; • Object as repeats NPPF; • Reference should be made to strategic employment sites; • How the 30% figure should be applied is unclear. 	<p>The text has been revised to better align Policy with the NPPF.</p> <p>Text has been updated to provide increased emphasis on volumetric approach to assessing suitability of schemes in main Policy text and supporting text and associated removal of reference to floorspace.</p> <p>Changes made to provide clarification that temporary buildings should be excluded from calculations.</p> <p>Supporting text updated to indicate how basements will be addressed and the introduction of new text to better reflect the standard planning condition that the Council uses when it removes permitted development rights on Green Belt schemes.</p>
Policy GBC3: Equestrian Uses in the GB and CBGB	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> • Previous equestrian policy (DM3) required new buildings or ancillary development to be small in scale. The use of “suitable” (GBC3(1)c) is subjective and represents a weakening of policy; • Paragraph GBC3(1)f should be expanded to include reference to accessibility to common land. • Loss of existing equestrian sites should be resisted; • The role equestrian use can play in individuals’ health and wellbeing should be recognised 	<p>Paragraph GBC3(1f) has been expanded.</p> <p>Text related to the health benefits of equestrianism has been inserted into supporting text.</p>
Policy GBC4: Development within the Countryside beyond the Green Belt	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • Query why rural workers also not covered in Green Belt section; • Specific Green Belt boundary queries 	<p>The title of the Policy is updated for clarity. Policy GBC4 is updated to incorporate new criterion to reflect that sites allocated in HAI are permissible within the Countryside, that provision of Gypsy and Traveller or</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> Specialist housing should be added as criterion within GBC4. 	Travelling Showpeople Sites that meet identified needs will be permissible and that new development should be proportionate to both site and setting. Supporting text has been updated accordingly.
Policy GBC5: Gordons School	
Historic England support this Policy. No other comments were received.	Supporting text updated to reflect completion of new facilities.
Section 8: Design and Heritage	
Policy DH1: Design Principles	
Matters raised included: <ul style="list-style-type: none"> wording changes that would protect the identity and character of Chobham; Concerns at the impact of permitted development and request for Article 4s; Connectivity should also include equestrianism; Health of residents and character of villages must be preserved; and, the need to reflect site constraints including utilities and to co-ordinate works by utilities. 	Additional Policy wording regarding the need for a comprehensive approach to development has been added. A new introductory Paragraph has been incorporated to emphasis the benefits of high quality design. In addition, new criterion have been added into the main Policy text relating to back land development. A number of other minor changes have been made for the purposes of clarity.
Policy DH2: Making Effective Use of Land	
Comments of support with other matters raised including: <ul style="list-style-type: none"> the need for some flexibility and clarity that the densities are targets; discouragement of backland development; some specific densities queried; question the 800m walking distance from Bagshot. 	The minimum net density for sites within 800m walking distance of railway stations has been revised down from 70dph to 60dph.
Policy DH3: Residential Space Standards	
Comments of support with other matters raised including: <ul style="list-style-type: none"> suggest adding further standards on e.g. outdoor utility space, parking, cycle storage and residential garden space; need to support the standards with robust evidence and test through viability; questions consistency with the Windlesham Neighbourhood Plan; 	No changes.

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • support for exceeding the standards; • identify the need for flexibility particularly in relation to major development proposals. 	
Policy DH4: Sustainable Water Use	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> • request to strengthen the grey water recycling requirements; • the need to monitor water consumption post occupation; • suggest the standard should be a minimum; • suggest a standard water efficiency condition applied to all new residential development; 	<p>Policy wording has been amended to clarify the requirements for rainwater storage and to set the 110 litres per person per day as a maximum.</p> <p>Supporting text is updated to clarify that the standard will be required by condition and that a fittings based approach should be used to determine water consumption.</p>
Policy DH5: Trees	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> • concern that the policy should also seek to preserve shrubs and hedgerows; • the need for tree lined streets to be appropriately designed to meet the needs of users; • questions seeking further clarification of the standards for measuring biomass and the circumstances under which Policy DH5 could allow development involving loss of trees. 	<p>Policy has been renamed ‘Trees and Landscaping’, to reflect that landscaping is also covered by the Policy.</p> <p>Amended the emphasis of the policy to a value-focused approach, as well as updates to note that replacement planting should be on a greater than 1:1 basis. Policy also amended to encourage additional tree planting and now clarifies that landscaping schemes should provide non-invasive native species or species attuned to climate change and should allow sufficient soil volume to enable new trees to survive into maturity.</p> <p>Supporting text has been amended to expand the benefits of trees, clarify expectations where trees are proposed to be removed, and encourage early engagement between applicants, arboriculturists and the Council.</p> <p>A number of other minor changes have been made for the purposes of clarity.</p>
Policy DH6: Shopfronts, Signage and Advertisements	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> • concerns of internally illuminated signage in the Chobham Conservation Area, 	No changes.

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> that the design of any hoardings erected on construction sites should reflect the character of the area and consideration given to landlords to maintain the attractiveness of vacant units. 	
Policy DH7: Heritage Assets	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> concerns where heritage assets may be deliberately neglected or damaged in order that their deterioration can be a factor in planning applications; minor wording changes suggested for consistency; consider an Article 4 direction is needed for Chobham Conservation Area; concerns regarding development relating to the locally listed Archaeology Centre on London Road Bagshot; concern regarding the potential for archaeological sites at Land East of Benner Lane, West End; the need to update the Local List; and the draft of the Local Plan does not place enough emphasis on the importance of Conservation Areas in their contribution the Borough as a whole and some boundaries should be reviewed. 	<p>A number of minor amendments have been made to the main Policy text to improve clarity. The most notable of these is the inclusion of a new criterion, indicating that proposals which put heritage assets to viable uses consistent with their conservation will be supported, provided that the proposals are consistent with other criterion.</p> <p>Additional supporting text has been added setting out that evidence of deliberate neglect of damage to a heritage building will not be taken in to account in decision making.</p>
DH8: Building Emission Standards	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> unclear whether net zero is a mandatory requirement from adoption of the Local Plan or will be 'stepped'. 	<p>Policy wording amended to require all major development proposals to produce a Site Waste Management Plan.</p> <p>A number of other amendments have been made to strengthen and expand the requirements of this policy and supporting text. This includes strengthened wording on construction practices relating to embodied emissions, added references to other design standards, such as PassivHaus, and updated text to reflect most up to date information on the Future Homes Standard.</p>

Summary of key issues raised	Changes made to the Local Plan
	A number of other minor changes have been made for the purposes of clarity.
Local Area Profiles	
A number of comments queried the status of the Profiles and whether they were part of Policy. Other responses made detailed comments on the Profiles seeking for example, the addition of sites, changes to map annotations and corrections to local information.	The Local Area Profiles (LAPs) set out a locally specific summary of the implications of Local Plan Policies and allocations on local areas within Surrey Heath. Having regard to the representations received which queried the purpose of the LAPs it is considered that these would be a more useful resource if they sit outside of the Local Plan process, rather than being set out in the Local Plan itself. The LAPS have therefore been removed from the Plan and will be published as separate information documents once the Local Pan is adopted.

Table 2: Draft Surrey Heath Local Plan Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople (2019 – 2038) Regulation 18 consultation August – September 2022.

Summary of key issues raised	Changes made to the Local Plan
Policy HA12/02 Swift Lane Extension	
<p>A few concerns raised in relation to:</p> <ul style="list-style-type: none"> • Access road not adequate • Risk of flooding • Number and size of pitches • Proximity to the recycling centre • Consideration of previous enforcement action 	Policy text has been updated to indicate that development should provide clear and defensible site boundaries sensitive to the countryside setting. Supporting text updated to reflect that opportunities to improve the access arrangements serving the recycling centre and Gypsy and Traveller site should be explored with Surrey County Council at pre-application stage.
Policy HA12/03 Land South of Broadford Lane, Chobham	
<p>Numerous objections received relating to:</p> <ul style="list-style-type: none"> • Access road not adequate • Conflict with existing bridleway • Existing congestion in Chobham and lack of infrastructure • In the Green Belt • Potential impact on listed building 	Following stakeholder engagement and feasibility work, it is no longer proposed to include this site as an allocation and it is not included within the Regulation 19 Local Plan.

<ul style="list-style-type: none"> • Conflict with adjacent sewage works, health and safety issues • Impact on character of the area, trees and biodiversity • Risk of flooding • Needs further evidence (ecology, noise, contamination) • Site is not sustainable • Questions support from Gypsy and Traveller community 	
<p>Policy HA12/04 Bonds Drive Extension</p>	
<p>A few objections raised in relation to:</p> <ul style="list-style-type: none"> • Risk of flooding • In the Green Belt • Site is unsuitable for any form of development • Access road not adequate • Unsustainable location and impact on infrastructure • Landowner states site is not for sale • Impact on biodiversity • Detrimental to character of the area • Presence of a burial ground • Impact on settled community 	<p>Following further feasibility work, it is no longer proposed to include this site as an allocation and it is not included within the Regulation 19 Local Plan.</p>
<p>General comments</p>	
<p>Support for allocating sites to meet identified accommodation needs. Future options for additional SANG need to be assessed. Consider using parts of strategic development sites and suggested alternative sites including MOD land. Provision could be made at Fair Oaks.</p> <p>Concerns have been raised in relation to:</p> <ul style="list-style-type: none"> • Insufficient pitches allocated • Windlesham and Chobham Parishes being disproportionately burdened with G&T sites/pitches • Weakening of the Green Belt by allocating sites within it • The methodology of the GTAA continues to be criticised • Management of the existing Kalima site • Potential use of compulsory purchase powers 	<p>In view of the challenges that the Council has faced in identifying suitable and deliverable sites to meet identified needs, a number of amendments have been made to Policies H9, H11 and GBC4.</p>