



Surrey Heath Local Plan: Preferred Options (2019 – 2038)

Gypsy, Traveller and Travelling Showpeople Site Identification Paper Addendum



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Surrey Heath Borough Council
Knoll Road, Camberley GU15 3HD
Planning.consultation@surreyheath.gov.uk



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1. Introduction

- 1.1. Surrey Heath Borough Council is preparing a new Local Plan for the Borough which will set out the strategies and policies that will guide the development of the Borough up to 2038. As part of the plan-making process, Surrey Heath Borough Council is required to address the needs of groups with specific housing requirements; this includes making provision for Gypsy and Traveller and Travelling Showpeople sites within the Local Plan, through the provision of pitches and plots. A key priority for the Council is to seek to identify within the Plan sufficient sites for Gypsy and Traveller pitches and Travelling Showpeople plots to meet the needs identified in the first 5 years of the plan period after adoption, as identified in the Surrey Heath Gypsy and Traveller Accommodation Assessment 2020 (GTAA).
- 1.2. In advance of the Regulation 18 Draft Local Plan consultation which was undertaken between March – May 2022, Surrey Heath undertook a portfolio of work to identify sites to meet the Council’s identified needs for Gypsy and Traveller and Travelling Showpeople accommodation. The approach taken is set out in full within the Gypsy, Traveller and Travelling Showpeople Site Identification Paper (GTTSSIP) and Gypsy, Traveller and Travelling Showpeople Topic Paper which was prepared to support the March – May 2022 consultation.
- 1.3. Despite the work undertaken to support the March – May 2022 consultation however, the Council was unable to identify sufficient sites capable of meeting the Council’s identified needs for Gypsies and Travellers and Travelling Showpeople. As such the Council made a commitment within the Draft Plan to continue work to identify further sites in advance of a focused Regulation 18 consultation on Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople in Summer 2022.
- 1.4. This document sets out the approach that has been undertaken to identifying sites in advance of the Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople Regulation 18 consultation. The Paper is an addendum to the GTTSSIP 2020 and should be read in conjunction with that document, which was prepared to support the Regulation 18 Draft Local Plan Issues and Options Consultation, and sets out the approach that was taken to the identification of sites prior to the March – May 2022 consultation.



1.5. This Paper sets out:

- a) A brief summary of the purpose and findings of the GTTSSIP 2020;
- b) An explanation of work undertaken in respect of Gypsies, Travellers and Travelling Showpeople accommodation since the Regulation 18 Draft Local Plan Preferred Options March – May 2022 consultation;
- c) Suggested additional sites for allocation.



2. Summary of the purpose and findings of the Gypsy, Traveller and Travelling Showpeople Site Identification Paper 2020 (GTTSSIP 2020)

- 2.1. To inform the development of the Regulation 18 Draft Local Plan Preferred Options consultation document, the Council prepared the Gypsy and Traveller and Travelling Showpeople Site Identification Paper 2020 (GTTSSIP 2020). The purpose of the Paper was to identify sites within Surrey Heath that may have potential to accommodate Gypsy and Traveller pitches or Travelling Showpeople plots and could be considered for allocation in the emerging Draft Surrey Heath Local Plan.
- 2.2. The GTTSSIP 2020 sets out a methodology for the assessment of potential sites, based on national policy and comparable studies undertaken by other authorities. The methodology initially sought to identify a broad list of sites, based on the potential site sources identified in Paragraph 011 of the National Planning Practice Guidance (Reference ID 3-011-20140306):
- a. Extant Planning Permissions or pitches/plots under construction;
 - b. Undetermined planning applications;
 - c. Planning applications that have been refused or withdrawn;
 - d. Sites with temporary permissions or unauthorised sites that may potentially be suitable for regularisation;
 - e. Pre-application enquiries (where not confidential);
 - f. Land in the ownership of the local authority;
 - g. Surplus and likely to become surplus public sector land. Such bodies will include, but not be limited to, Surrey County Council and the Ministry of Defence;
 - h. Sites submitted by developers through formal 'Call for Sites' and/or through local plan consultations;
 - i. Sites suggested through engagement with local communities and call for sites;
 - j. Vacant and derelict land; and,
 - k. Intensification and/or extension of existing permanent authorised sites and other sites.



- 2.3. Once a broad list of sites had been identified, sites with obvious constraints¹ were filtered out before being taken through a three-stage assessment process, which comprised the following steps:

Stage 1: Consideration against absolute constraints

- 2.4. At this stage, any sites subject to absolute constraints including (but not limited to) the Thames Basin Heaths Special Protection Area and associated 400m buffer zone and sites lying wholly within Flood Zone 3b were filtered out from further consideration.

Stage 2: Suitability, Availability and Achievability

- 2.5. At this Stage consideration was given to other factors that may affect the deliverability of a site. Sites were considered against a range of criteria, with a Red-Amber-Green (RAG) assessment used to identify the performance of each site against each criterion. In some cases, a 'red' rating was considered to warrant the exclusion of a site from further consideration, depending on the severity of the policy constraint.

Stage 3: Detailed consideration of sites

- 2.6. At Stage 3, any sites not screened out at Stage 2 were taken through an Officer workshop to establish a more detailed understanding of the availability, suitability and achievability of sites, the feasibility of any mitigation required and the relative merits of each site.

Outcomes of the assessment process

- 2.7. The GTTSSIP 2020 concluded that three sites had potential to accommodate Gypsy and Traveller accommodation, subject to further feasibility work. These were:

- Watchmoor Reserve, Camberley;
- Krooner Park, St Georges Industrial Estate, Helix Business Park and Recycling Centre, Camberley; and,
- Land south of Junction 3 of the M3, Lightwater.

- 2.8. However, two of these sites (Watchmoor Reserve and Krooner Park) were subsequently identified as being unsuitable for the proposed use, as a result of the further feasibility work undertaken to support the allocations. The site at Land south of Junction 3 of the M3 was granted consent prior to the Regulation 18 Draft Local Plan consultation and as a result, was not included as an allocation.

¹ Sites unable to accommodate 2 or more pitches and/or that have clear physical constraints.



- 2.9. As a result of the outcomes of the work undertaken, the Draft Regulation 18 Local Plan Preferred Options March – May consultation document only incorporated one site allocation. This site was at Diamond Ridge Woods, Camberley².

3. Work undertaken to identify sites following the Regulation 18 Draft Local Plan consultation March – May 2022

Introduction

- 3.1. Efforts to identify further sites following the Regulation 18 Draft Local Plan consultation March – May 2022 were focused on two key areas. The first related to reviewing the methodology and findings of the GTTSSIP 2020. The second related to the identification of additional sites that could be taken through the site identification methodology, as revised.

Review of the GTTSSIP Methodology

- 3.2. As an initial step, consideration was given in respect of whether the methodology set out in the GTTSSIP 2020 remained appropriate and whether any adjustments should be made. Following review, the following changes were considered.

Adjusting the minimum site size for consideration.

- 3.3. The GTTSSIP 2020 set out a minimum site size for consideration of 0.12ha (for two pitches). The average pitch size at Swift Lane is estimated to be c.346m², with a range of pitch sizes across the site from 181 – 595m². At Kalima, the average pitch size is c.404m² with a range of 250 – 564m². These pitch sizes are reasonable, and suggest that a minimum site size could be as low as c.0.07ha. However, this does not take account of space needed for communal areas, waste storage, boundary treatments, access and turning space. Making sufficient allowance for these, it is considered that 0.12ha remains a robust minimum site size.

² Land at Diamond Ridge Woods was assessed through the GTTSSIP 2020 but was excluded from further consideration owing to SANG and availability constraints. However, following the completion of the GTTSSIP 2020, engagement with Natural England identified that not all the land at Diamond Ridge Woods was essential to the function of the SANG. Further feasibility work identified that the site is likely to be deliverable for 4 Gypsy and Traveller pitches.



Consideration of the exclusionary criteria set out at Stage 2 of the methodology and whether they should be relaxed

- 3.4. Ten of the criteria considered at Stage 2 of the site identification methodology set out within the GTTSSIP 2020 have 'red' category exclusionary criteria. Consideration was given in respect of whether, in light of the site availability issues faced by the Council, any of these could be relaxed in order to enable the identification of further sites. The consideration of the exclusionary criteria is set out in Table 1 below. This led to three criterion being revised from exclusionary to non-exclusionary.

Table 1: Review of exclusionary criteria set out at Stage 2 of the GTTSSIP 2020 assessment methodology

Criterion	Exclusionary Criteria	Could this be relaxed?
Green Belt	Site comprises green field land and there is no likelihood of the site accommodating affordable pitches.	Yes - in the absence of sites outside the Green Belt, it is considered that there may be exceptional circumstances that warrant an alteration to Green Belt boundaries.
Employment Land	Would result in the loss of an employment use on a strategic site that falls within the LEP's four key priority sectors and no alternative provision has been identified.	No – Retention of strategic employment sites are key to meeting the Borough's identified employment needs.
SANGS	The development would have a material impact upon a SANG and no alternative SANG provision has been identified	Yes – the experience with Diamond Ridge woods has demonstrated that SANG sites may have potential to help meet identified needs in some exceptional circumstances.
Community Uses	Would result in the loss of a built community facility which could not be relocated.	No – built community facilities are valuable community resources and no over-provision of such facilities has been identified. Loss of built community facilities will continue to be resisted.



<p>Vehicular and pedestrian access</p>	<p>No suitable and safe access is likely to be gained to the site</p>	<p>No – Suitable and safe access for all users is an essential requirement for site provision. However, Officers may want to review whether the conclusions reached on sites excluded for this purpose remain robust, in consultation with Surrey County Council as necessary.</p>
<p>Shape, ground conditions and levels</p>	<p>Ground conditions/shape/levels are not conducive to providing pitches</p>	<p>No – these factors remain important considerations in respect of site deliverability. However, Officers may want to review whether the conclusions reached on sites excluded for this purpose remain robust.</p>
<p>Contamination</p>	<p>Site is identified as having risk of contamination with no likely prospect of viable remediation</p>	<p>No – contamination issues remain an important consideration in respect of site deliverability. However, Officers may want to review whether the conclusions reached on sites excluded for this purpose remain robust.</p>
<p>Neighbouring uses</p>	<p>Site highly likely to be incompatible with neighbouring uses</p>	<p>No – compatibility with neighbouring uses is a key aspect of site deliverability, however Officers may want to review whether the conclusions reached on sites excluded for this purpose remain robust.</p>
<p>Availability</p>	<p>Unavailable</p>	<p>No – availability is a key aspect of site deliverability, however Officers may want to review whether the conclusions reached</p>



		on sites excluded for this purpose remain robust.
Accessibility	Site exceeds maximum distance from all infrastructure	Yes – in the absence of sites available in more accessible locations it is considered reasonable to examine sites in less accessible locations.

- 3.5. The revised criterion relating to accessibility, SANGs and Green Belt are set out in Annex I.
- 3.6. Following revision of the Stage 2 criterion, Officers reviewed the assumptions underpinning the sites considered through the GTTSSIP 2020 to identify whether the relaxation of criteria for Green Belt, SANGS and accessibility would enable any sites to be progressed to Stage 3 of the assessment process. Consideration was also given to whether there had been any change in circumstances to any sites since the last assessment was undertaken, that would affect their progression through the site identification process. Outcomes of this review process are set out below.

Outcomes of the review of sites previously dismissed at Stage 2 of the GTTSSIP 2020

- 3.7. Following review of the sites previously dismissed at Stage 2 of the GTTSSIP 2020, four additional sites previously attributed ‘red’ ratings for criterion that were subsequently revised to non-exclusionary criterion were initially identified. These were:
 - GT001 - St Catherine’s SANG (previously dismissed at Stage 2 owing to SANG status);
 - GT002 – Windlemere SANG (previously dismissed at Stage 2 owing to Green Belt status);
 - GT087 – 154 Guildford Road (previously dismissed at Stage 2 owing to Green Belt status)
 - GT099 – Deepford Cottage (previously dismissed at Stage 2 owing to accessibility issues).



- 3.8. The removal of red exclusionary ratings for these sites would in theory enable them to progress to Stage 3 of the assessment process, however prior to progressing these sites to Stage 3, the other assumptions made in the site assessments were checked to ensure that they remain up-to-date. As a result of this exercise, only 154 Guildford Road was progressed to Stage 3, with updated availability evidence leading Officers to conclude that sites at St Catherine's SANG, Windlemere SANG and Deepford Cottage should not progressed to Stage 3.
- 3.9. Concurrently, the assumptions underpinning all other sites assessed at Stage 2 were then examined to establish if the conclusions reached were still current. This review only identified 1 further potential option for progressing to Stage 3:
- Swift Lane, Bagshot. The site was previously dismissed from consideration at Stage 2 as it was considered that the site was at capacity. Subsequently (and following enforcement action), a small area to the south and east of the site has been identified as having potential to expand the site.
- 3.10. Updated Stage 2 Site Appraisals for the sites referenced above are set out at Annex 2.
- 3.11. At Stage 3, detailed consideration was given to the two sites identified for progression from Stage 2 following the review process. The Stage 3 assessment concluded that Swift Lane is a potential candidate for allocation to meet Gypsy and Traveller and Travelling Showpeople needs. Site ref. GT087 at 154 Guildford Road, West End is subject to a current appeal and as such has not been considered for allocation at this time. A summary of the findings of the assessment of Land at Swift Lane is set out below and the full Stage 3 assessments for 154 Guildford Road and Swift Lane are set out in full at Annex 3.
- Land at Swift Lane (Swift Lane Extension), Bagshot: The site was not identified as having any significant issues in respect of designated or undesignated heritage assets, employment sites, Sites of Nature Conservation Importance, SANG, access or any built community facilities. Notwithstanding this, it is noted that the site falls within flood zone 2 and that the land is known to have contamination risks. The implications of these issues will need to be explored further.
The site is identified as having potential to deliver 5 Gypsy and Traveller pitches subject to further investigation in respect of contamination and flood risk.



Identification of new sites to be taken through the revised site identification methodology

3.12. Following the review of the sites already identified, consideration was given to whether there are any other sites that may be suitable for Gypsy and Traveller provision that have not yet been identified, but which could be taken through the site identification methodology (as revised). This workstream took a three-pronged approach, comprising the following:

- Undertaking a targeted call for sites;
- Monitoring land for sale within Surrey Heath;
- Requesting site suggestions from Officers and Members.

3.13. The outcomes of these steps are set out below.

Call for Sites

3.14. A targeted Call for Sites was undertaken between 19th April 2022 – 10th June 2022. Only one site was put forward in response to the Call for Sites. This related to land at Fair Oaks Airport and would form part of wider 1,500 dwelling scheme. The development of Fair Oaks Airport does not form part of the preferred spatial strategy set out within the Draft Local Plan, and as a result this site has been excluded from consideration without assessment through the site identification methodology.

Reviewing land for sale in Surrey Heath

3.15. Across the site identification process, no land has been identified within Surrey Heath which is for sale and capable for use as Gypsy and Traveller provision; land that has been made available for sale across the process has generally been unaffordable for the proposed use or has been significantly affected by the presence of the Thames Basin Heaths Special Protection Area and its associated 400m buffer zone.

Site Suggestions from Officers and Elected Members

3.16. To ensure that no stone was left unturned in searching for potential sites, site suggestions were sought from Council Officers and Members. This resulted in the identification of 12 new sites for consideration. Of these, two sites did not meet the minimum site size threshold which could be taken through the site assessment methodology set out in the GTTSSIP 2020 (as revised). A full list of the new sites considered are set out at Annex 4.



Outcomes of Stage 1: Consideration against absolute constraints

- 3.17. Of the sites identified through Officer and Member suggestions, only one site was identified as being wholly affected by absolute constraints, with the site in question falling within the 400m buffer zone of the Thames Basin Heaths Special Protection Area within which no net new residential development is permitted. Details of the site are set out at Annex 5.

Outcomes of Stage 2: Consideration against non-absolute constraints

- 3.18. As a result of the Stage 2 assessment and in line with the site identification methodology set out within the GTTSSIP 2020 (as revised), remaining sites were assessed against a number of criteria focused upon their impact upon heritage assets, environmental designations or other amenities, physical constraints, availability and accessibility. Any sites receiving a 'red' rating were removed from further consideration. In total, seven sites were removed from consideration at Stage 2, with the most common reason for removal being availability. Results of the Stage 2 assessments are set out in detail at Annex 6.

Outcomes of Stage 3: Detailed consideration of sites

- 3.19. The Stage 3 assessment undertook a qualitative appraisal of the two sites that passed through the Stage 2 assessment (land at Broadford Lane and land south west of Bonds Drive (Bonds Drive Extension)). This assessment concluded that both sites were considered as potential candidates for allocation to meet Gypsy and Traveller and Travelling Showpeople needs. In both cases, this is subject to wider consideration of whether there are exceptional circumstances to warrant an alteration to Green Belt boundaries, which is required to enable the sites to come forward. Each of the sites is summarised below and the findings of the Stage 3 assessment is set out in full at Annex 7.
- Land south of Broadford Lane, Chobham: The site was not identified as having any significant issues in respect of designated or undesignated heritage assets, employment sites, flood risk, SANG or any built community facilities. Few concerns were identified with respect of compatibility with neighbouring land uses and the site was identified as being reasonably sustainably located. Notwithstanding this, it is noted that the site is likely to have contamination issues, with the site historically being utilised for landfill. The implications of this will need to be explored further. Likewise, it is recognised that Broadford Lane is narrow; passing places will be required to support the use and the suitability of the access onto Castle Grove Road would need to be explored further. **The site is identified as having potential to deliver up to 13 - 16 Gypsy and Traveller pitches subject to further investigation in respect of contamination and exception and sequential tests.**



- Land south west of Bonds Drive (Bonds Drive Extension), Chobham: The site was not identified as having any significant issues in respect of designated or undesignated heritage assets, contamination risks, employment sites, SANG, access or any built community facilities. Few concerns were identified with respect of compatibility with neighbouring land uses. Notwithstanding this, it is noted that the site falls within flood zone 2, with areas of flood zone 3 present and that the availability of the land for the proposed use is still being explored, including consideration of compulsory purchase. The implications of these will need to be explored further. It is also noted that the site falls within a designated SNCI and further investigation in respect of the impact upon the SNCI will be required.

The site is identified as having potential to deliver 5 – 9 Travelling Showpeople plots subject to further investigation in respect of land availability and flood risk.



4. Conclusion and Next Steps

- 4.1. Through the further site identification work undertaken by the Council set out above, three sites have been identified as having potential to deliver pitches and plots within the Borough. These are:
- Swift Lane Extension, Bagshot (5 Gypsy and Traveller pitches);
 - Land south of Broadford Lane, Chobham (13 – 16 Gypsy and Traveller pitches);
 - Land south west of Bonds Drive (Bonds Drive Extension), Chobham (5 – 9 Travelling Showpeople Plots);
- 4.2. It is noted that the sites are subject to a number of constraints, however, in the absence of any alternative, less constrained sites, it is considered that these should be consulted on as potential sites to help meet Gypsy and Traveller and Travelling Showpeople needs. The Council will undertake further work to establish the ultimate deliverability of these sites and this will be considered alongside any consultation responses received, prior to the preparation of the Regulation 19 Pre-Submission Local Plan.
- 4.3. The site at 154 Guildford Road is currently subject to an ongoing appeal and as a result, it is not proposed to allocate this site at the time.
- 4.4. In addition to the above, it is noted that all three sites are located within the general extent of the Green Belt. In view of the high level of need for Gypsy and Traveller and Travelling Showpeople accommodation identified within the Gypsy and Traveller Accommodation Assessment (GTAA) 2020, it is considered that there are strategic level exceptional circumstances to warrant an alteration to Green Belt boundaries. Notwithstanding this, it is recognised that Case Law emphasises the importance of demonstrating exceptional circumstances at both a strategic and local level³. Prior to progressing the Local Plan to Regulation 19 Stage, further consideration will be given to whether there are local level exceptional circumstances to warrant an alteration to Green Belt boundaries.

³ Inspector (Jonathan Bore) Examination of the Guildford Borough Local Plan: Strategy and Sites, Inspector's Questions and Comments (No. 1) (23 March 2018)



Annex I: Revised GTTSSIP Stage 2 criterion for Green Belt, SANGs and Accessibility

Green Belt

4.5. Criterion set out in GTTSSIP 2020:

Red (Reject site)	Amber (Further investigation/mitigation will be required)	Green (No concerns identified)
Site comprises green field land and there is no likelihood of the site accommodating affordable pitches.	The site comprises previously developed land and the impact on the openness of the Green Belt will require further investigation.	Would not result in development within the Green Belt. The site comprises green field land and would be capable of accommodating affordable pitches.

4.8. Revised criterion following Regulation 18 Draft Local Plan Preferred Options March – May 2022 consultation:

Red (Reject site)	Amber (Further investigation/mitigation will be required)	Green (No concerns identified)
N/A	The site comprises Green Belt land and the impact on the openness of the Green Belt will require further investigation.	Would not result in development within the Green Belt.



		The site comprises green field land and would be capable of accommodating affordable pitches.
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SANG

4.9. Criterion set out in GTTSSIP 2020:

Red (Reject site)	Amber (Further investigation/mitigation will be required)	Green (No concerns identified)
The development would have a material impact upon a SANG and no alternative SANG provision has been identified.	The development would have a material impact upon a SANG, however alternative provision could be identified and has a realistic prospect of coming forward	The development would not have a material impact upon a SANG.

4.10. Revised criterion following Regulation 18 Draft Local Plan Preferred Options March – May 2022 consultation:

Red (Reject site)	Amber (Further investigation/mitigation will be required)	Green (No concerns identified)
N/A	The development would have a material impact upon a SANG. Implications of loss of SANG would need to be explored.	The development would not have a material impact upon a SANG.



Accessibility

4.11. No Red-Amber-Green diagram was set out in the GTTSSIP 2020 for accessibility, however the textual explanation indicates the following:

Red (Reject site)	Amber (Further investigation/mitigation will be required)	Green (No concerns identified)
Site exceeds maximum distance from all types of infrastructure	Site is close to some types of infrastructure and distance from others.	Site is within the maximum distance for most types of infrastructure

4.12. The criterion has been revised following review to indicate:

Red (Reject site)	Amber (Further investigation/mitigation will be required)	Green (No concerns identified)
N/A	Site exceeds maximum distance from all types of infrastructure. Or, Site is close to some types of infrastructure and distance from others.	Site is within the maximum distance for most types of infrastructure



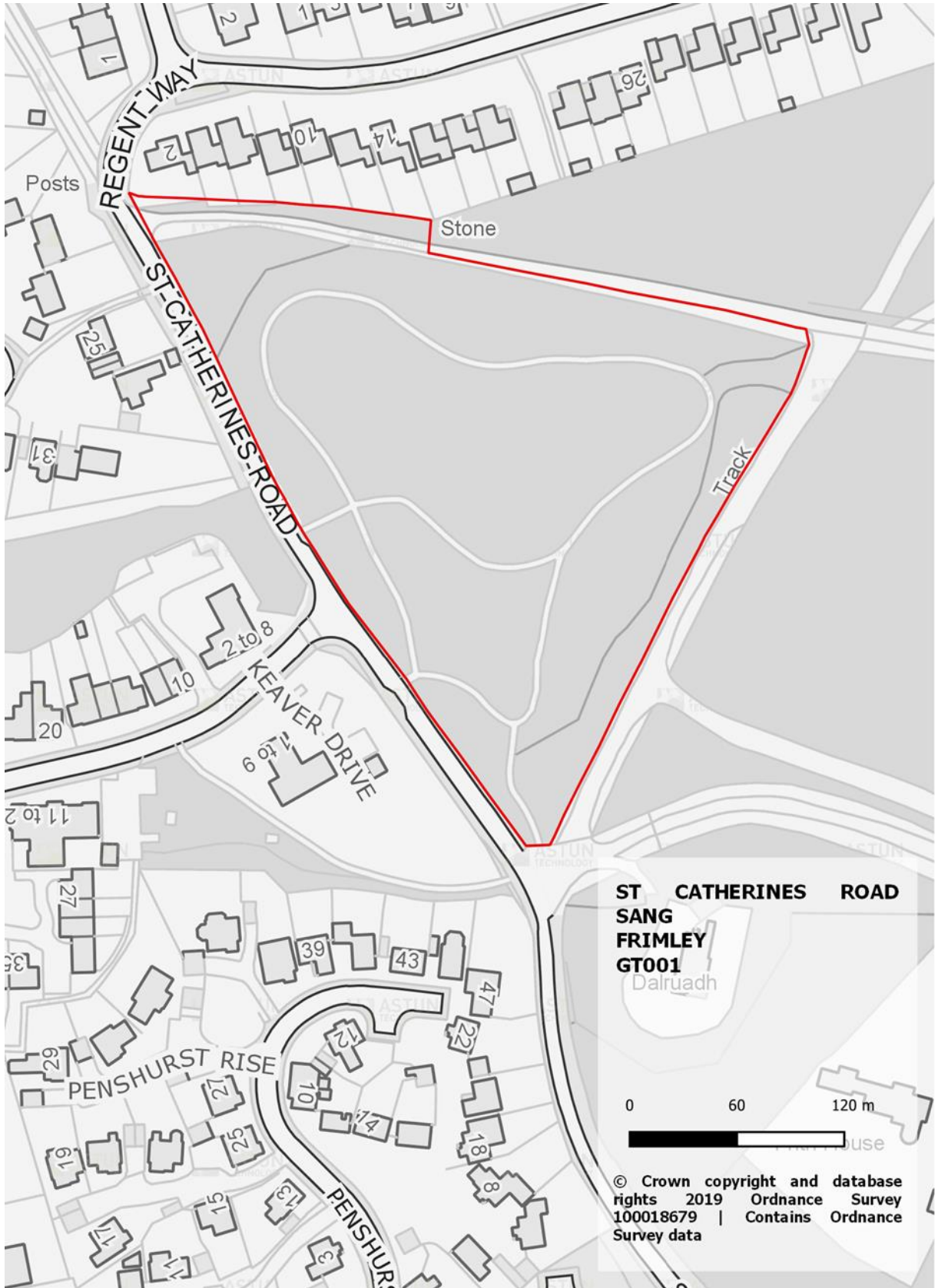
Annex 2: Revised Assessments from sites previously considered within the GTTSSIP 2020 Study

Site Name	St Catherine's Road SANG	
Ref	GT001	
Ward	Frimley	
Site Area (ha)	1.72	
Trees	TPO's are present adjacent to the site, to the south west and north of the site.	
Heritage	No Heritage Assets affected.	
Green Belt	Would not result in the development of the Green Belt	
Countryside	Would result in the development of the countryside between Frimley and Deepcut	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space within a settlement area	
SNCI	Would not affect an SNCI	
Flood Zone 2	Would not fall within Flood Zone 2	
SANGS	The development would have a material impact upon a SANG. Implications of loss of SANG would need to be explored.	
Community Uses	Would not result in the loss of a community facility	
Access	Suitable access capable of being provided	
Ground Conditions	Site relatively level	
Contamination	Site is not known to be contaminated	



Site Boundaries	Boundaries clearly demarcated on two sides as a result of mature tree screen	
Neighbouring Uses	Edge of settlement site bound on two sides by countryside	
Availability	The previous assessment identified the site to be unavailable owing to the SANG status of the site, however this was re-considered in detail after the methodology was revised to remove SANG status as a reason for discontinuing the site. Following review however, covenants and the use of the site for the Southampton to London Pipeline project were considered to affect the availability of the site for alternative uses.	
Accessibility	Site is close to some types of infrastructure and distant from others	
Notes		
Take through to Stage 3:		NO





Site Name	Windlemere SANG, West End	
Ref	GT002	
Ward	Bisley and West End	
Site Area (ha)	15.24	
Trees	No TPOs are present	
Heritage	No Heritage Assets affected	
Green Belt	The site comprises Green Belt land and the impact on the openness of the Green Belt will require further investigation.	
Countryside	Would not result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space within a settlement area	
SNCI	Would not affect an SNCI	
Flood Zone 2	Would not fall within Flood Zone 2	
SANGS	The site comprises SANG	
Community Uses	Would not result in the loss of a community facility	
Access	Suitable access capable of being provided	
Ground Conditions	Shape/ground conditions/levels relatively conducive to providing pitches	
Contamination	Site is not known to be contaminated	
Site Boundaries	Boundaries are clearly demarcated on some sides, but owing to size of site, it is likely that additional boundaries will need to be demarcated	
Neighbouring Uses	Site relatively rural with no notable industrial uses nearby. Likely to be compatible with neighbouring uses	



Availability	The 2020 assessment indicated that availability for identified use requires further exploration. Further exploration has indicated that the site is significantly affected by the Southampton to London Pipeline project and ecological constraints.	
Accessibility	Site is close to some types of infrastructure and distant from others	
Notes	Impact on trees not covered by TPO's will require consideration.	
Take through to Stage 3		NO



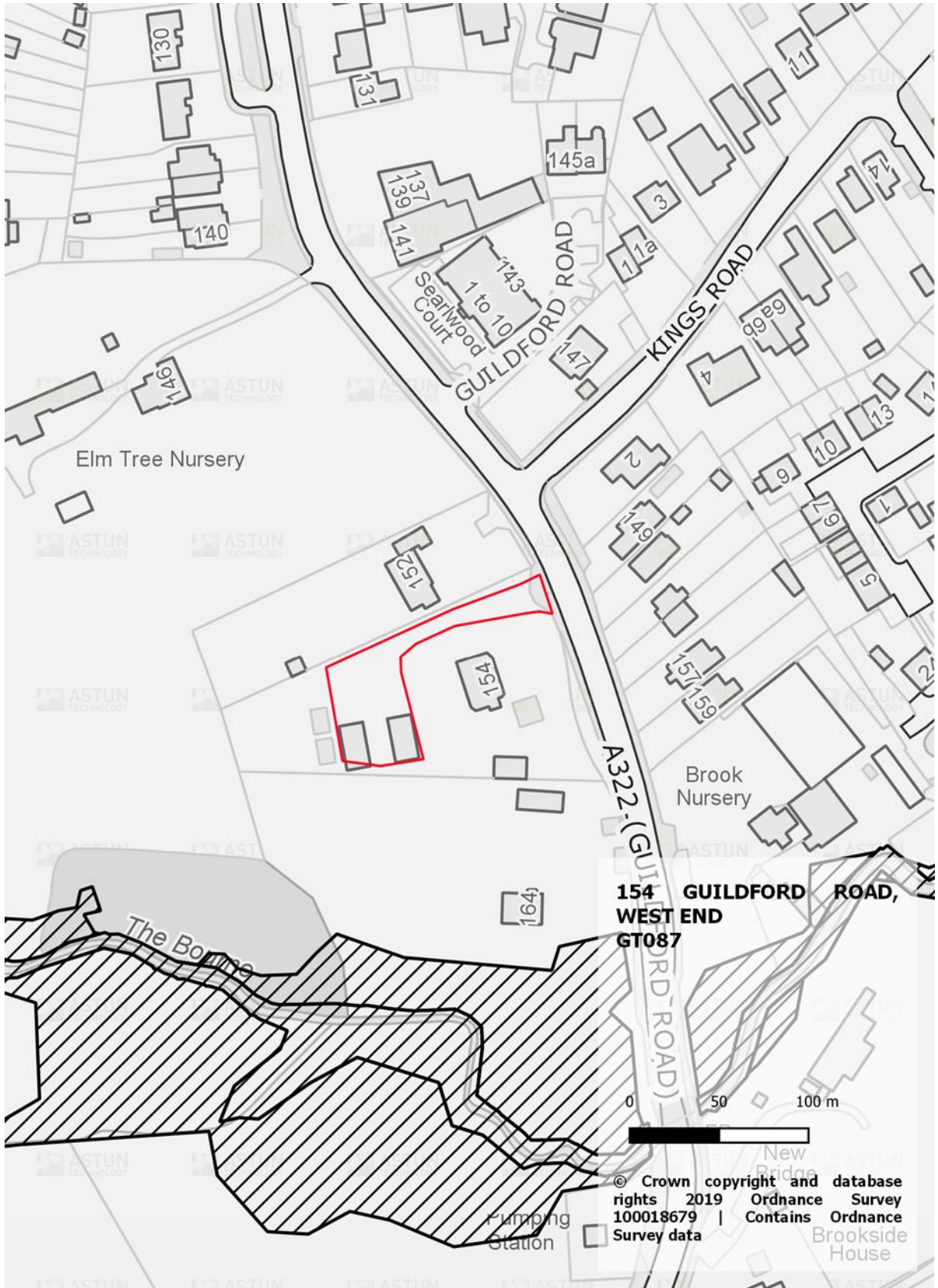


Site Name	154 Guildford Road, West End	
Ref	GT087	
Ward	Bisley and West End	
Site Area (ha)	0.1	
Trees	No TPOs are present	
Heritage	No Heritage Assets affected	
Green Belt	The site comprises Green Belt land and the impact on the openness of the Green Belt will require further investigation.	
Countryside	Would not result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space	
SNCI	Would not affect an SNCI	
Flood Zone 2	Would not fall within Flood Zone 2	
SANGS	The development would not have a material impact upon a SANG	
Community Uses	Would not result in the loss of a community facility	
Access	Likely that suitable and safe access can be gained to the site	
Ground Conditions	Shape/ground conditions/levels conducive to providing pitches	
Contamination	Site is not known to be contaminated	
Site Boundaries	Site is relatively well contained	
Neighbouring Uses	Site situated in edge of settlement location. Site is on balance likely to be compatible with neighbouring uses	
Availability	Site understood to be available, with current application seeking consent for two traveller pitches	



Accessibility	Site is close to some types of infrastructure and distant from others	
Notes		
Take through to Stage 3:		YES





Site Name	Swift Lane Gypsy Site	
Ref	GT012	
Ward	Bagshot	
Site Area (ha)	1.67	
Trees	No TPOs are present on or close to the site.	
Heritage	No Heritage Assets are present on or close to the site.	
Green Belt	The site comprises previously developed land and the impact on the openness of the Green Belt will require further investigation.	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space within a settlement area	
SNCI	An SNCI would not be affected.	
Flood Zone 2	Would be subject to sequential and exception tests	
SANGS	The development would not have a material impact upon a SANG	
Community Uses	Would not result in the loss of a built community facility.	
Access	The site is very likely to benefit from suitable and safe access for the use proposed.	
Ground Conditions	Shape/ground conditions/levels conducive to providing pitches	
Contamination	Site is identified as having risk of contamination from landfill. The level of risk on the proposed use and potential options for remediation would need to be explored.	
Site Boundaries	Boundaries are generally clearly demarcated	



Neighbouring Uses	Site adjacent to a recycling centre but already in established use as a Gypsy and Traveller Site	
Availability	Previously considered land unavailable for additional pitches, however following enforcement action being taken against unauthorised work and detailed assessment in respect of how site layout may be altered, a small area of land to the south and east of the site is available for an extension.	
Accessibility	Site is close to some types of infrastructure and distant from others.	
Notes		
Take through to Stage 3:		YES





Annex 3: Stage 3 Assessments of sites previously considered within the GTTSSIP 2020 Study

154 Guildford Road

0.1ha

GT087

The site at 154 Guildford Road is relatively unconstrained. The site is not affected by Tree Preservation Orders, and does not affect any built community facilities or designated sites, including Strategic Employment Sites, Green Spaces, Sites of Nature Conservation Importance or Suitable Alternative Natural Green Spaces.

The nearest historic asset to the site is a locally listed dwelling house at 164 Guildford Road, which is situated c.50 metres south east of the site. Taking into account the size of the site and built relationship between the site and the property, it is not envisaged that site has any material impact upon the setting and special character of the property. In respect of flooding, the site does not fall within flood zones 2 or 3. The site is not known to be affected by any contaminated land.

The site is considered to fall within a reasonably sustainable location on the periphery of Bisley, where regular bus services connect the settlement with Woking, Guildford and Camberley. In addition the site is located within 800m of a primary school and 300m of a doctors surgery.

It is recognised that the proposed development was assessed in detail under Planning Application Ref. 18/0875. The assessment found the scheme to be acceptable from a character, residential amenity and highways perspective. Under the assessment of Planning Application SU/18/0875, it was recognised that the proposal represents inappropriate development within the Green Belt; notwithstanding this, the Committee report prepared for the application indicated that the applicants personal circumstances were sufficient to outweigh the identified harm to the Green Belt and constituted very special circumstances. The application was ultimately recommended for approval subject to a temporary 5 year permission and a personal use to limit the long term harm to the Green Belt, subject to a SAMM payment.

The SAMM payment was not made and as a result the application was refused. The application is currently at appeal.



It is recognised that the Council may need to give consideration to releasing land from the Green Belt in order to help meet the Councils identified needs. As such, consideration has been given as to whether the site should be identified as a potential allocation within the Local Plan (subject to there being local level exceptional circumstances to warrant an alteration to Green Belt boundaries). However given that the site is currently being addressed through the appeal process, it is not considered that it would be appropriate to allocate the site at this time.

Recommendation: Do not allocate at this time.



Swift Lane, Bagshot

1.67ha

GT012

The site at Swift Lane is not affected by Tree Preservation Orders, and does not affect any built community facilities or designated sites, including Strategic Employment Sites, Green Spaces, Sites of Nature Conservation Importance or Suitable Alternative Natural Green Spaces.

The nearest historic asset to the site is the Windlesham Church Road Conservation Area, which is located in excess of 650m from the site; taking account of the distance and the characteristics of the intervening landscape, it is not envisaged that provision of a small extension to the site are likely to have any material impact upon the setting and special character of the conservation area.

The site is considered to fall within a reasonably sustainable location on the periphery of Bagshot, where regular bus services connect the settlement with Woking, Guildford and Camberley. In addition the site is located close to Bagshot Railway Station and the main retail centre at Bagshot. Surrey County Council have advised that the existing access serving the site is suitable, although it would be beneficial to upgrade passing places along Swift Lane.

Notwithstanding the above, flood risk and contamination are potential barriers to the delivery of further pitches at Swift Lane. In respect of contamination, the site has formerly been used for landfill and recent unauthorised uses (against which enforcement action has been taken) may have also had a contaminating effect. To understand how contamination may affect the potential of the site to deliver pitches, a more in depth intrusive investigation will ultimately be required. In addition, it is noted that the site falls within Flood Zone 2; in the event that land levels are required to be raised to accommodate the use, objections may be received from the Environment Agency.

Recommendation: **Identify as a potential allocation for 5 pitches.**

Undertake further research and analysis to establish the viability implications of potential contamination risks.



Annex 4: Overview of assessment of new sites considered following Regulation 18 Draft Local Plan March – May consultation

Site proceeds at this Stage	
Site does not proceed at this Stage	
This Stage is not applicable to this site	

Site Ref.	Address	Ward	Stage 1	Stage 2	Stage 3		How identified
GT116	Land adjacent to Camberley Wastewater Treatment Works	St Michaels				x	Suggestion from Elected Member
GT117	Land at Lake Road	Frimley Green				x	Suggestion from Elected Member
GT118	Land at Johnsons Wax	Frimley Green				x	Suggestion from Elected Member
	Land at East Curve, Sturt Road	Frimley Green	Already assessed following earlier work			x	Suggestion from Elected Member
N/A	Land at the Royal Military Academy adjacent to the	Town	Not taken through assessment – does not meet			x	Suggestion from Elected Member



	A30 London Road		minimum site size requirements				
GT119	Land SE New Road (former M3 Compound)	Windlesham & Chobham				×	Suggestion from Elected Member
GT120	Land east of Broadway Road	Windlesham & Chobham				×	Officer Suggestion
GT121	Land south of Broadford Lane	Windlesham & Chobham				×	Officer Suggestion
GT122	Go Kart Track south of Windlemere SANG	Bisley & West End				×	Officer Suggestion
GT123	Land at Blackdown Road	Mytchett & Deepcut				×	Officer Suggestion
N/A	Land at Old Bisley Road/Ridgewood Drive	Heatherside	Not taken through assessment – does not meet minimum site size requirements			×	Officer Suggestion
GT124	Depot, Hook Mill Lane	Lightwater				×	Member Suggestion
GT125	Land south west of Bonds Drive (Bonds Drive Extension)	Windlesham & Chobham					Officer Suggestion



Annex 5: New sites filtered out at Stage 1

Site Ref.	Address	Ward	Justification
GT122	Go Kart Track south of Windlemere SANG	Bisley & West End	Falls within the 400m Buffer Zone of the Thames Basin Heaths SPA



Annex 6: Stage 2 Assessments of new sites

Site Name	Land Adjacent to Camberley Wastewater Treatment Works (WwTW), Camberley	
Ref	GT116	
Ward	St Michaels	
Site Area (ha)	0.53ha	
Trees	No TPOs are present	
Heritage	No Heritage Assets affected	
Green Belt	Would not result in the development of the Green Belt	
Countryside	Would result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space	
SNCI	Would not affect an SNCI	
Flood Zone 2	Would fall within Flood Zone 2	
SANGS	The development would not have a material impact upon a SANG.	
Community Uses	Would not result in the loss of a built community facility.	
Access	Adjacent to the A331. There is potential for the site to be suitably and safely accessed but further investigation will be required	
Ground Conditions	Shape/ground conditions/levels conducive to providing pitches	
Contamination	Site is not known to be contaminated.	
Site Boundaries	Site is generally open and would require new boundary treatments	



Neighbouring Uses	Site closely contained by existing commercial development. The site may be incompatible with neighbouring uses, but the impact requires further investigation.	
Availability	Site is being redeveloped for an alternative use.	
Accessibility	Site lies in close proximity to some infrastructure and distant from others.	
Notes		
Take through to Stage 3		NO



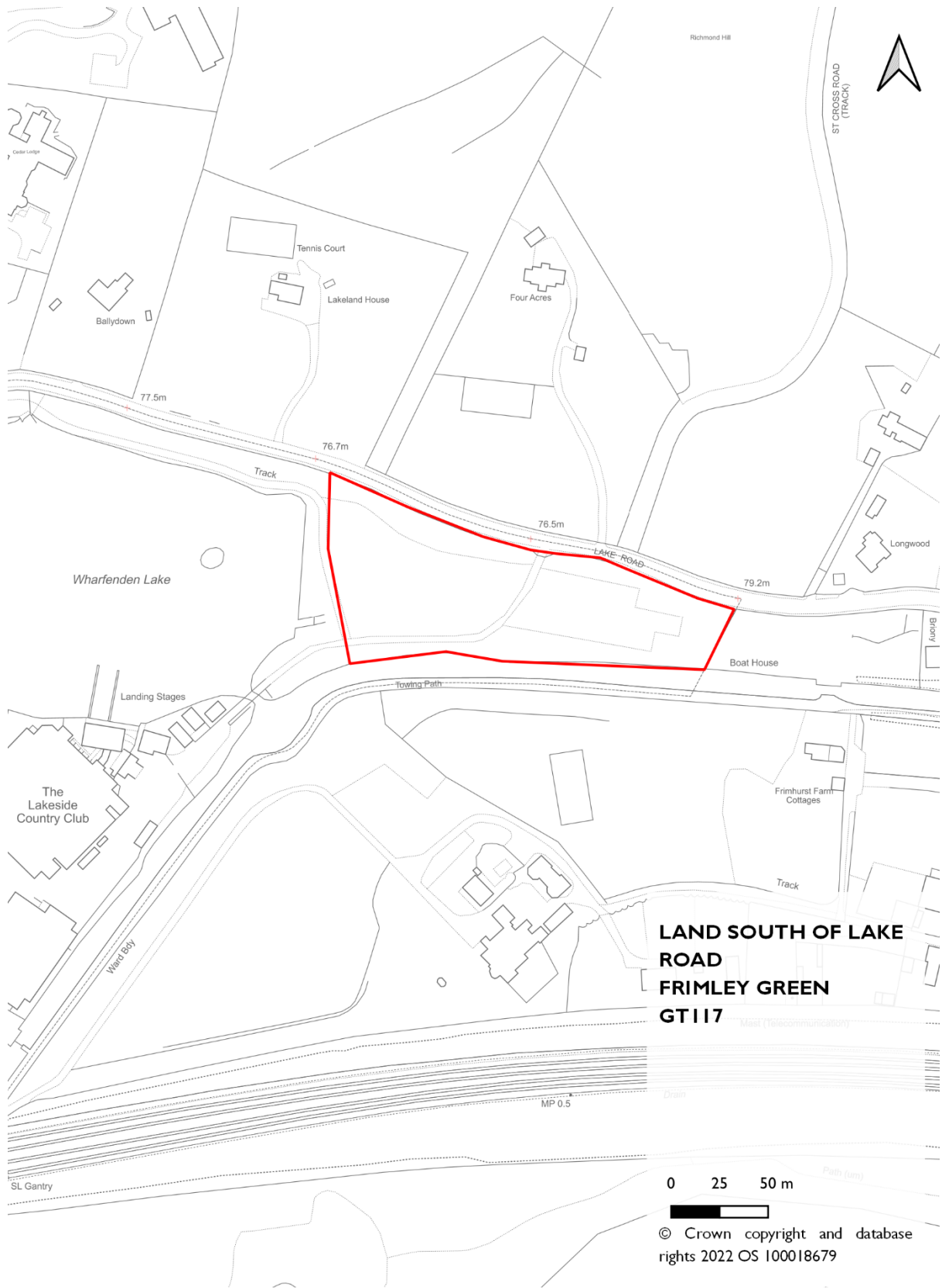


Site Name	Land south of Lake Road	
Ref	GT117	
Ward	Frimley Green	
Site Area (ha)	1.21ha	
Trees	TPO/10/71 affects the site	
Heritage	Lies within the Basingstoke Canal Conservation Area	
Green Belt	Would not result in the development of the Green Belt	
Countryside	Would result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space	
SNCI	Would not affect an SNCI	
Flood Zone 2	Would not fall within Flood Zone 2	
SANGS	The development would not have a material impact upon a SANG.	
Community Uses	Would not result in the loss of a built community facility	
Access	The site is very likely to benefit from suitable and safe access for the use proposed	
Ground Conditions	Shape/ground conditions/levels conducive to providing pitches	
Contamination	Site is not known to be contaminated	
Site Boundaries	Site is generally open and would require new boundary treatments	
Neighbouring Uses	Site likely to be compatible with neighbouring uses	
Availability	Site unavailable for the proposed use.	



Accessibility	Site lies in close proximity to some infrastructure and distant from others.	
Notes		
Take through to Stage 3		NO





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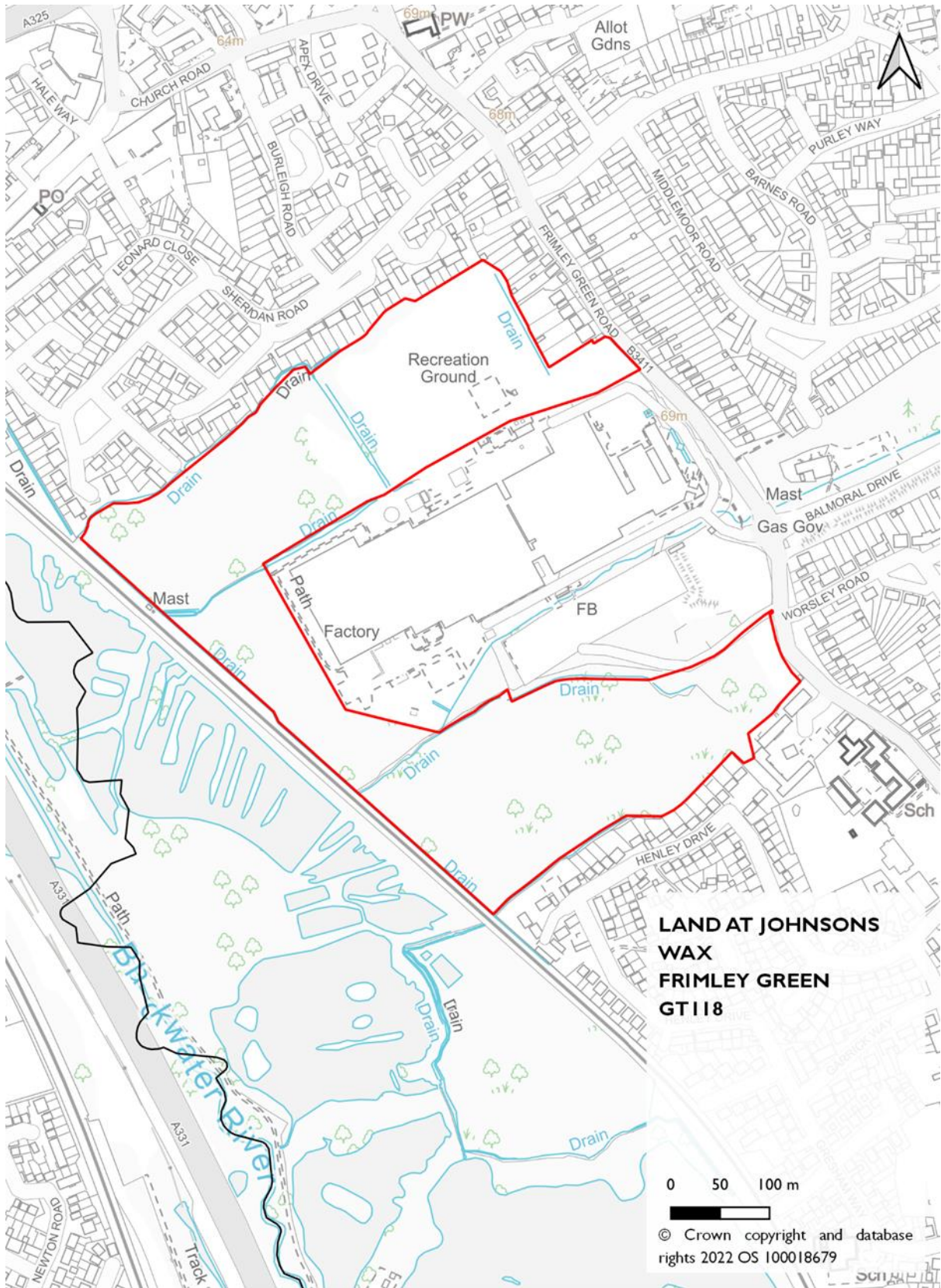


Site Name	Land at Johnsons Wax	
Ref	GT118	
Ward	Frimley Green	
Site Area (ha)	15ha	
Trees	No TPOs affect the site	
Heritage	No heritage assets are present on or close to the site	
Green Belt	Would not result in the development of the Green Belt	
Countryside	Would not result in the development of the countryside	
Employment	Would not affect a Strategic Employment Site (site surrounds a locally important employment site)	
Green Spaces	Would affect a designated green space within a settlement area and the impact of the loss of the green space would need to be investigated further	
SNCI	Would not affect an SNCI	
Flood Zone 2	Some parts of the site fall within Flood Zone 2, however much of the land within the site falls outside of Flood Zone 2	
SANGS	The development would not have a material impact upon a SANG	
Community Uses	Would not result in the loss of a built community facility	
Access	The site is very likely to benefit from suitable and safe access for the use proposed	
Ground Conditions	Shape/ground conditions/levels conducive to providing pitches	
Contamination	Greenfield land at the site is not known to be contaminated	



Site Boundaries	Site is generally open and would require new boundary treatments	
Neighbouring Uses	Site likely to be compatible with neighbouring uses	
Availability	Site unavailable for the proposed use.	
Accessibility	Site lies in good proximity to local facilities	
Notes		
Take through to Stage 3		NO



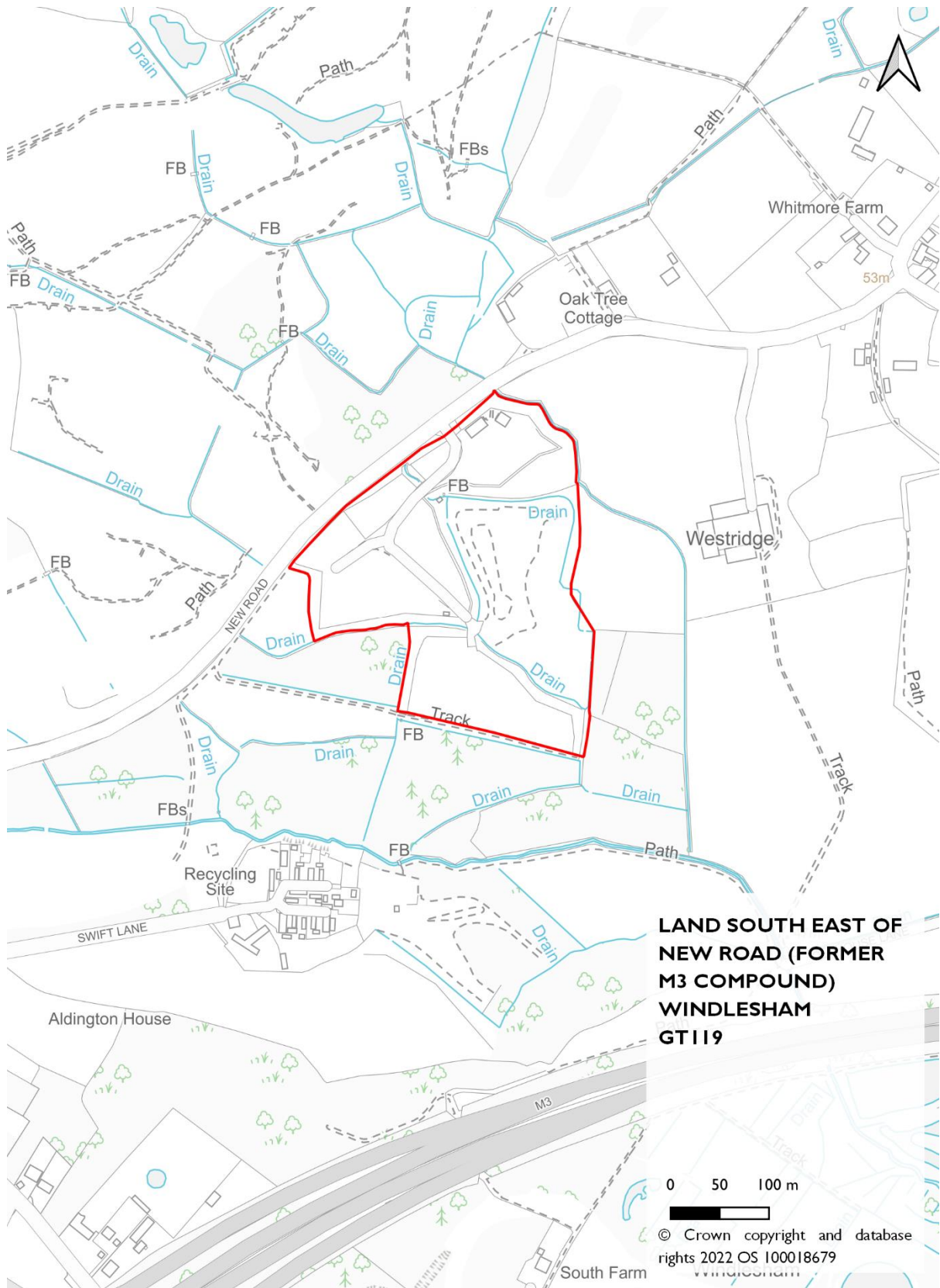


Site Name	Land south east of New Road (former M3 compound)	
Ref	GT119	
Ward	Windlesham & Chobham	
Site Area (ha)	7.02ha	
Trees	No TPOs affect the site	
Heritage	No heritage assets are present on or close to the site	
Green Belt	Would result in the development of the Green Belt	
Countryside	Would not result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space within a settlement area	
SNCI	Would not affect an SNCI	
Flood Zone 2	The full extent of the site falls within Flood Zone 2	
SANGS	The development would not have a material impact upon a SANG	
Community Uses	Would not result in the loss of a built community facility	
Access	The site is very likely to benefit from suitable and safe access for the use proposed	
Ground Conditions	Shape/ground conditions/levels generally conducive to providing pitches. However, the site is bisected by drainage ditches	
Contamination	The site has potential for contamination as a result of a former nursery use and a more recent highways compound use.	
Site Boundaries	Site is generally open and would require new boundary treatments	



Neighbouring Uses	Site likely to be compatible with neighbouring uses	
Availability	Site unavailable for the proposed use.	
Accessibility	Site lies in close proximity to some facilities and is distant from others	
Notes		
Take through to Stage 3		NO



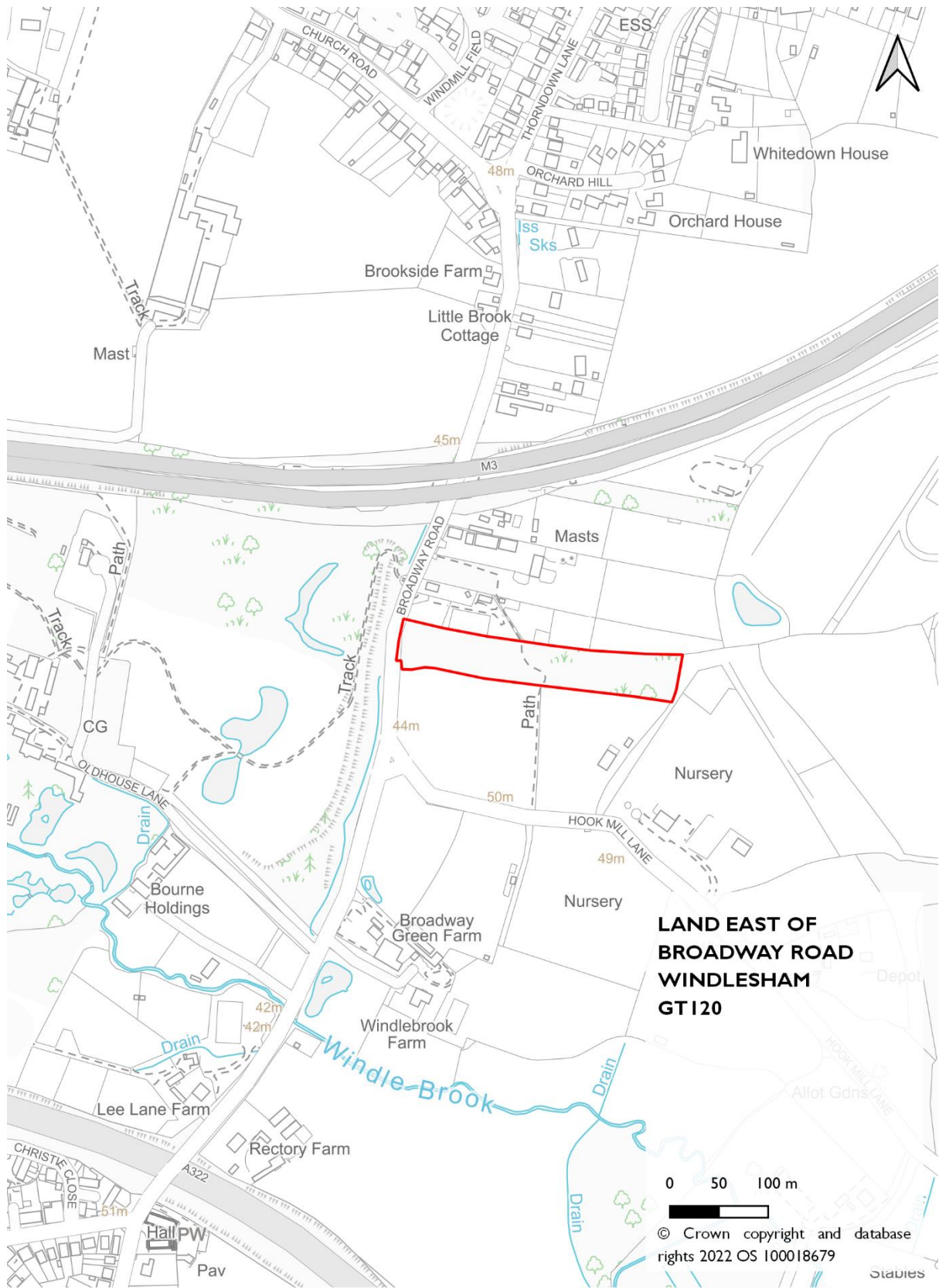


Site Name	Land east of Broadway Road	
Ref	GT120	
Ward	Windlesham & Chobham	
Site Area (ha)	1.23ha	
Trees	No TPOs affect the site	
Heritage	No heritage assets are present on or close to the site	
Green Belt	Would result in the development of the Green Belt	
Countryside	Would not result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space within a settlement area	
SNCI	Would not affect an SNCI	
Flood Zone 2	The site does not fall within Flood Zone 2	
SANGS	The development would not have a material impact upon a SANG	
Community Uses	Would not result in the loss of a built community facility	
Access	The site is very likely to benefit from suitable and safe access for the use proposed	
Ground Conditions	Shape/ground conditions/levels generally conducive to providing pitches	
Contamination	The site is not known to be contaminated	
Site Boundaries	Site boundaries are generally well defined	
Neighbouring Uses	Site likely to be compatible with neighbouring uses	
Availability	Site unavailable for the proposed use	



Accessibility	Site lies in close proximity to some facilities and is distant from others.	
Notes	A public right of way bisects the site and would need to be diverted in order to make full use of the site.	
Take through to Stage 3		NO



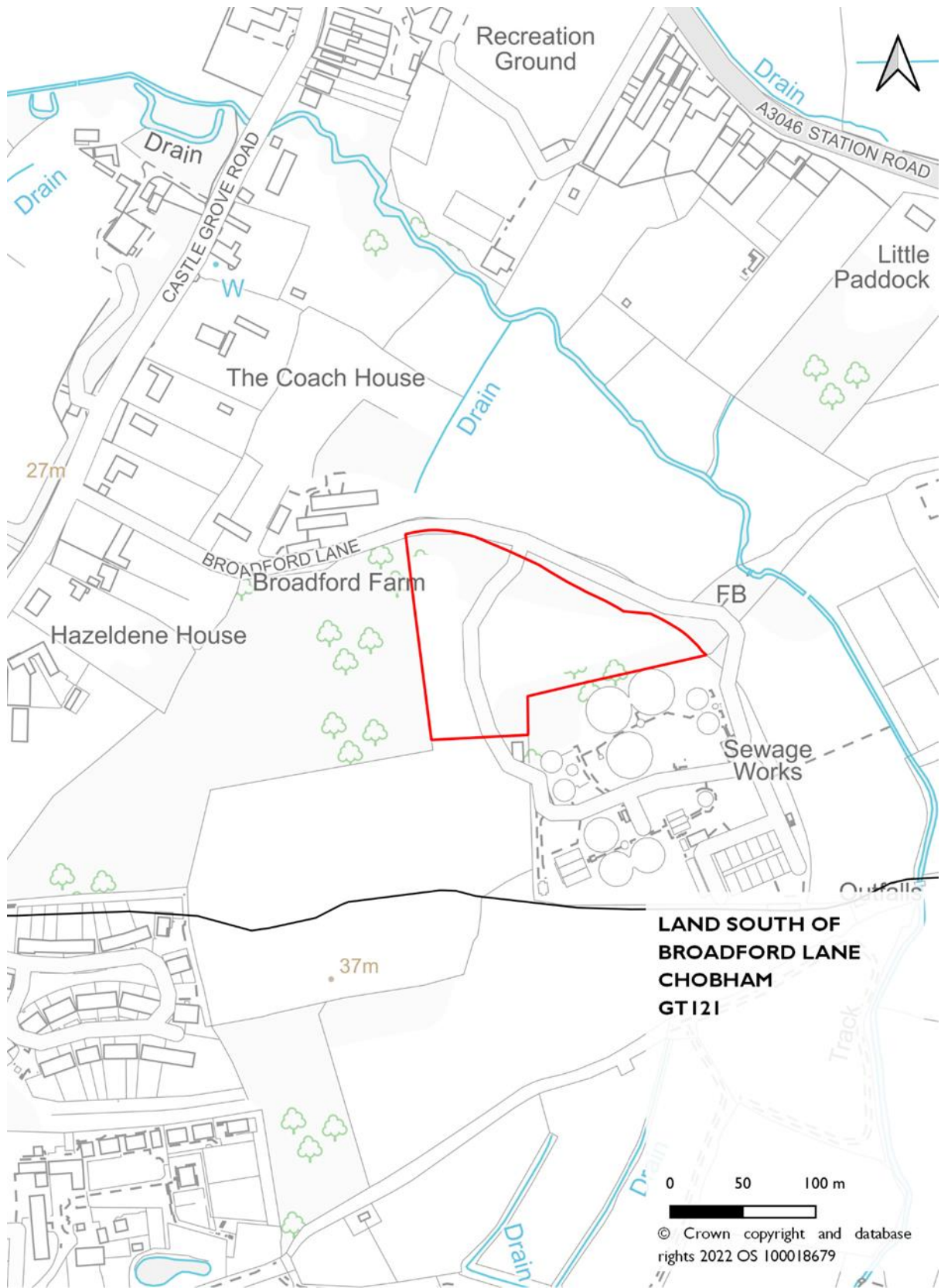


Site Name	Land south of Broadford Lane	
Ref	GT121	
Ward	Windlesham and Chobham	
Site Area (ha)	1.63ha	
Trees	No TPOs affect the site	
Heritage	The Chobham Village Conservation Area lies 156m to the north of the land parcel. Two locally listed buildings and one Grade II listed buildings are located to the west of the site.	
Green Belt	Would result in the development of the Green Belt	
Countryside	Would not result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space within a settlement area	
SNCI	Would not affect an SNCI	
Flood Zone 2	The site does not fall within Flood Zone 2.	
SANGS	The development would not have a material impact upon a SANG	
Community Uses	Would not result in the loss of a built community facility	
Access	There is potential for the site to be suitably and safely accessed but further investigation will be required, taking account the nature of Broadford Lane and the access onto Castle Grove Road, in addition to classification of Broadford Lane as a bridleway	
Ground Conditions	The shape/ground conditions/levels generally conducive to providing pitches.	



Contamination	The site has potential for contamination as a result of a former nursery use and a more recent landfill use	
Site Boundaries	It is considered that new boundary treatments would be required, especially taking account of the size of the site	
Neighbouring Uses	Site may be incompatible with neighbouring uses (lying adjacent to Chobham Wastewater Treatment Works), but the impact requires further investigation	
Availability	Site considered to be available for the proposed use	
Accessibility	Site lies in close proximity to some facilities and is distant from others.	
Notes		
Take through to Stage 3		Yes



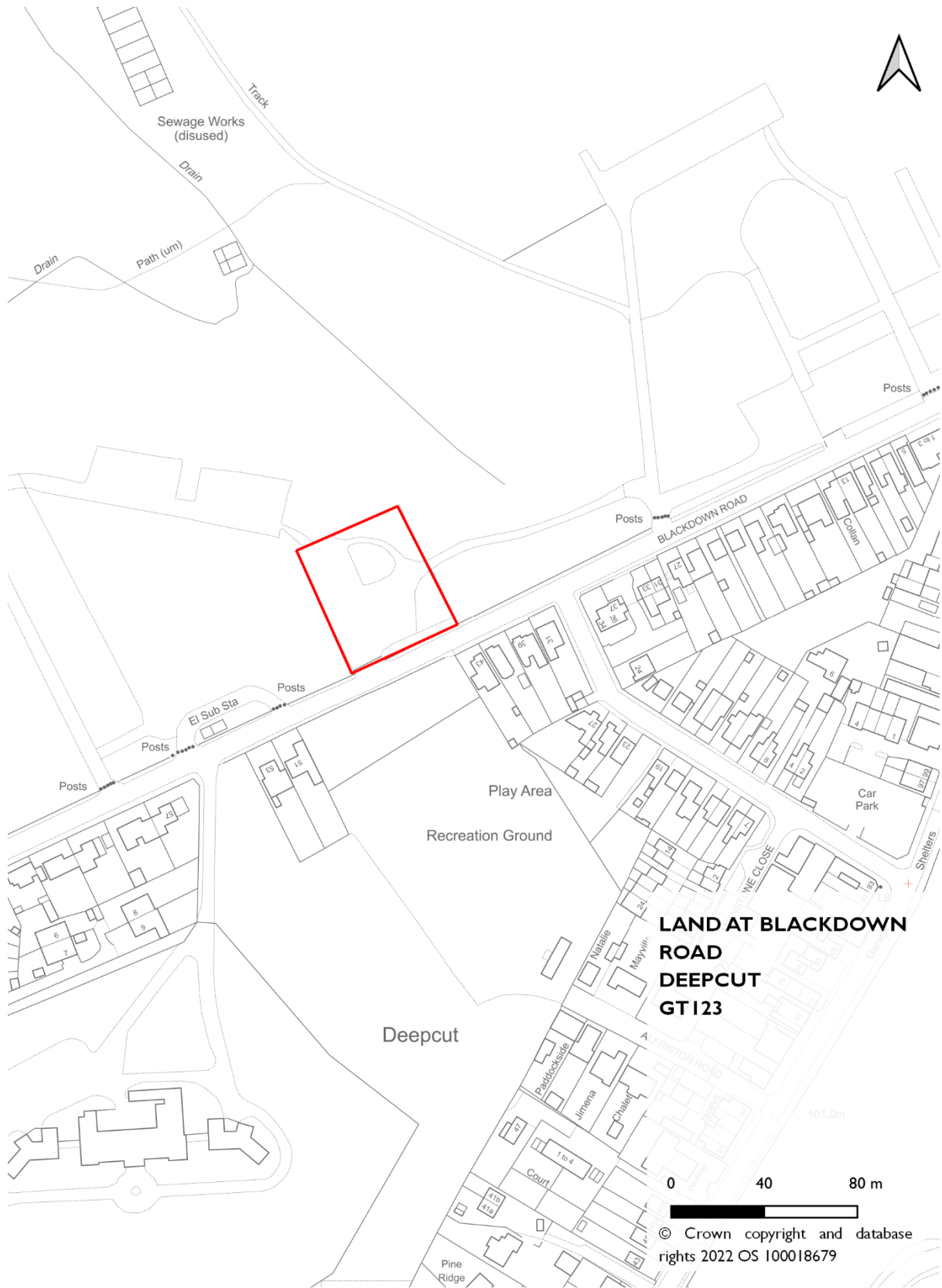


Site Name	Land at Blackdown Road	
Ref	GT123	
Ward	Mytchett & Deepcut	
Site Area (ha)	0.28ha	
Trees	No TPOs affect the site	
Heritage	No heritage assets are present on or close to the site	
Green Belt	Would not result in the development of the Green Belt	
Countryside	Would result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space within a settlement area	
SNCI	An SNCI may be affected and the impact upon the SNCI requires further investigation	
Flood Zone 2	The site does not fall within Flood Zone 2.	
SANGS	The development would not have a material impact upon a SANG	
Community Uses	Would not result in the loss of a built community facility	
Access	There is potential for the site to be suitably and safely accessed	
Ground Conditions	The shape/ground conditions/levels generally conducive to providing pitches.	
Contamination	The site has potential for contamination as a result of its previous military use	
Site Boundaries	It is considered that new boundary treatments would be required.	
Neighbouring Uses	Site likely to be compatible with neighbouring uses	



Availability	Site is not available for the proposed use	
Accessibility	Site lies in close proximity to some facilities and is distant from others.	
Notes		
Take through to Stage 3		No



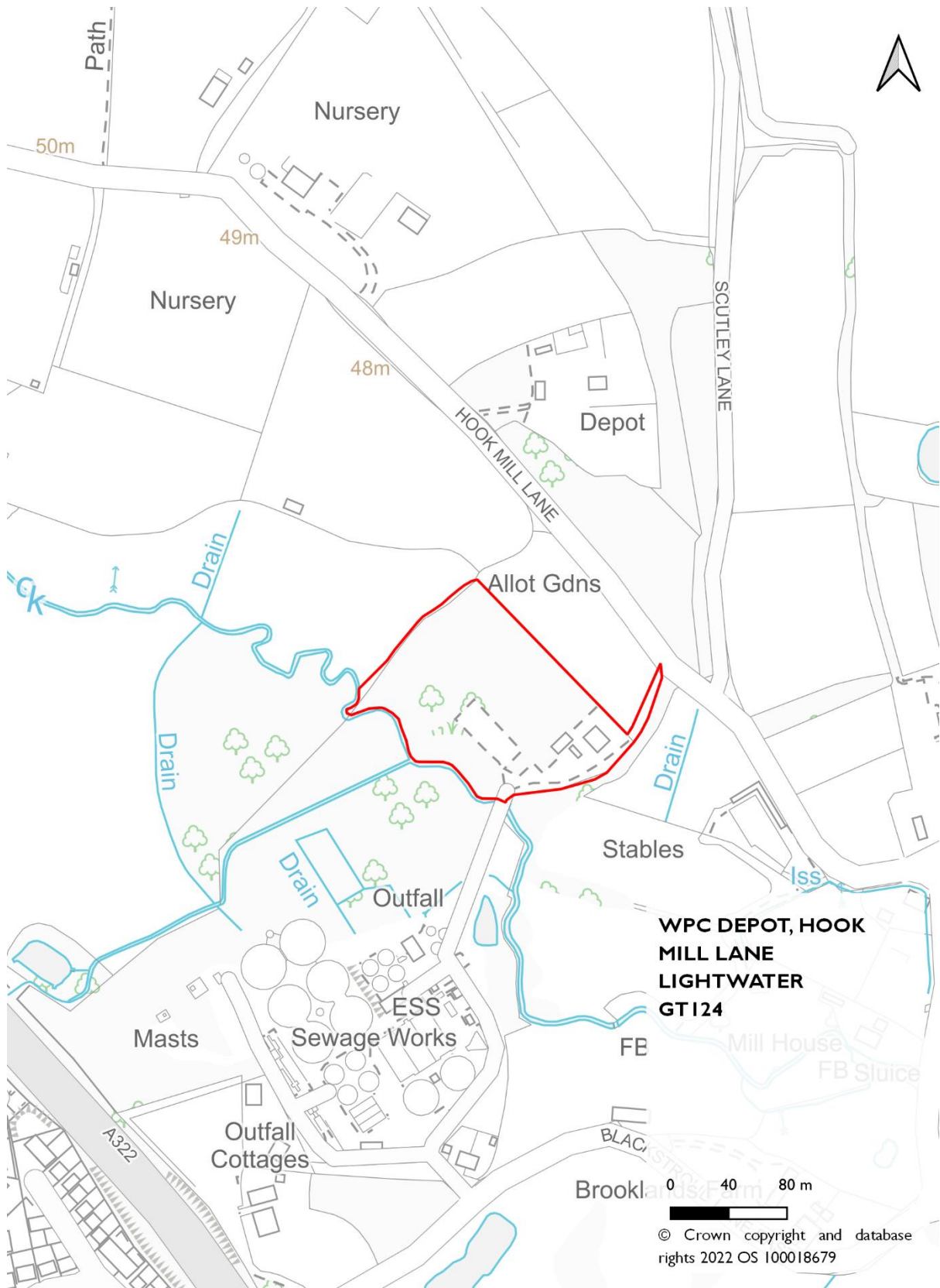


Site Name	WPC Depot, Hook Mill Lane	
Ref	GT124	
Ward	Lightwater	
Site Area (ha)	1.61ha	
Trees	No TPOs affect the site	
Heritage	No heritage assets are present on or close to the site	
Green Belt	Would not result in the development of the Green Belt	
Countryside	Would result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space within a settlement area	
SNCI	Would not affect a designated SNCI	
Flood Zone 2	The site falls within Flood Zone 2.	
SANGS	The development would not have a material impact upon a SANG	
Community Uses	Would not result in the loss of a built community facility	
Access	There is potential for the site to be suitably and safely accessed but further investigation will be required	
Ground Conditions	Ground conditions and/or levels could be viably made suitable for the provision of Gypsy and Traveller pitches but may ultimately affect site capacity.	
Contamination	The site has potential for contamination as a result of its previous uses	
Site Boundaries	It is considered that new/additional boundary treatments would be required.	
Neighbouring Uses	Site likely to be compatible with neighbouring uses	



Availability	Site is not confirmed to be available for the proposed use	
Accessibility	Site lies in close proximity to some facilities and is distant from others.	
Notes		
Take through to Stage 3		No



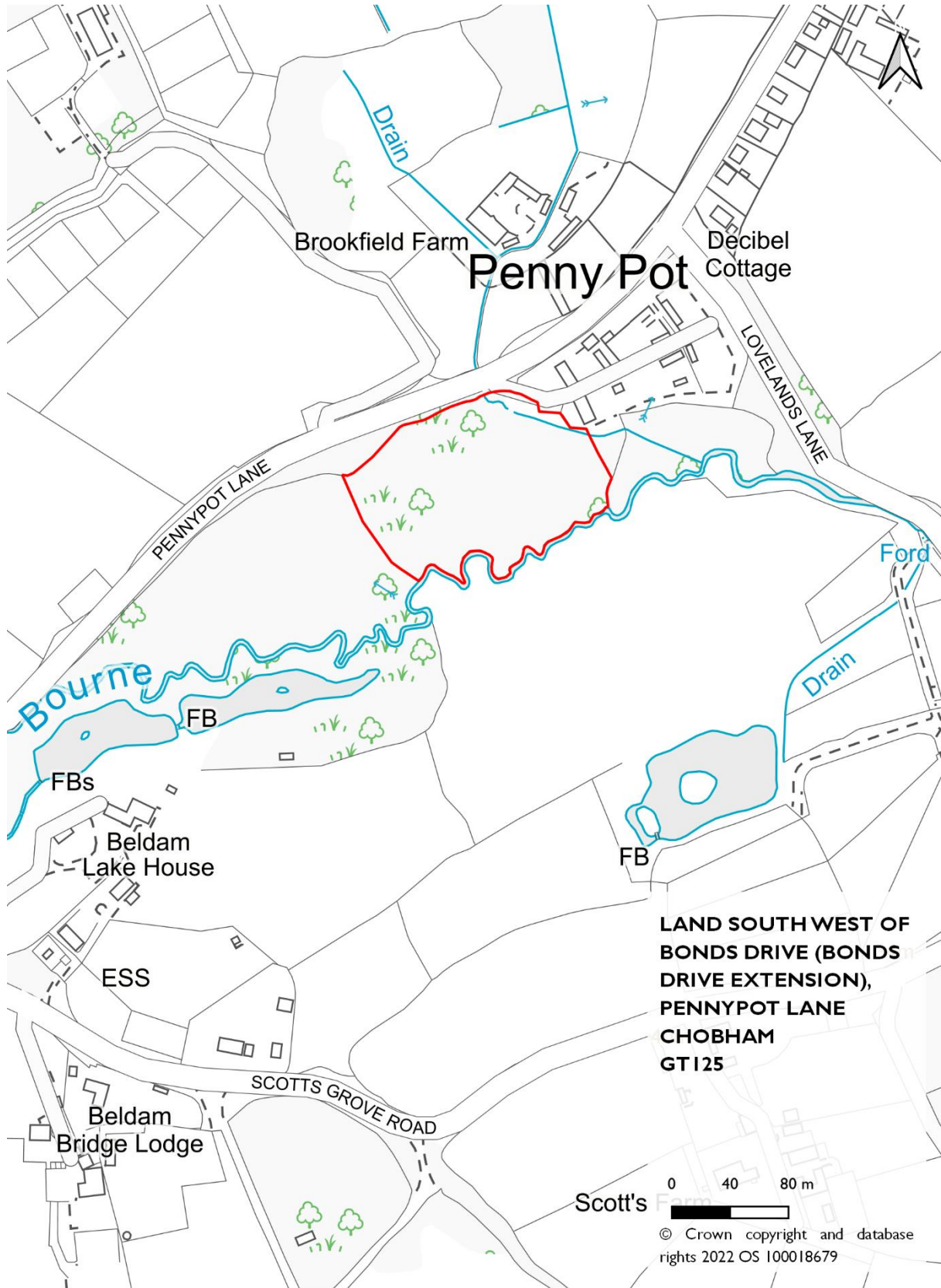


Site Name	Land south west of Bonds Drive (Bonds Drive Extension)	
Ref	GT125	
Ward	Windlesham and Chobham	
Site Area (ha)	1.57	
Trees	No TPOs affect the site	
Heritage	No designated heritage assets are present on or close to the site, however it is reported that a burial mound is located to the south west of the site	
Green Belt	Would result in the development of the Green Belt	
Countryside	Would not result in the development of the countryside	
Employment	Would not affect an employment site	
Green Spaces	Would not affect a designated green space within a settlement area	
SNCI	Site falls within an SNCI and requires further investigation	
Flood Zone 2	The site falls within Flood Zone 2, with some areas of Flood Zone 3	
SANGS	The development would not have a material impact upon a SANG	
Community Uses	Would not result in the loss of a built community facility	
Access	There is potential for the site to be suitably and safely accessed but further investigation will be required	
Ground Conditions	Ground conditions and/or levels could be viably made suitable for the provision of Gypsy and Traveller pitches, subject to wider flood risk considerations	
Contamination	The site is not known to be contaminated	



Site Boundaries	It is considered that new/additional boundary treatments would be required.	
Neighbouring Uses	Site likely to be compatible with neighbouring uses	
Availability	Site is not within Council ownership and availability is currently in question, however given the location of the site it is feasible that compulsory purchase could be explored further in the event that the site is not available	
Accessibility	Site falls outside the maximum preferred distances for all infrastructure	
Notes		
Take through to Stage 3		Yes





Annex 7: Stage 3 Assessments for new sites

Land South of Broadford Lane, Chobham

1.63ha

GT121

The site at Land South of Broadford Lane is not affected by Tree Preservation Orders, and does not affect any built community facilities or designated sites, including Strategic Employment Sites, Green Spaces, Sites of Nature Conservation Importance or Suitable Alternative Natural Green Spaces.

The site is located c.170m south of the Chobham Village Conservation Area and is located c.180m east of the nearest 'standalone' heritage asset, which is a Grade II listed dwelling at Pond House. Taking account of the spatial relationship between the site and the nearest heritage assets, it is not envisaged that the site would have a significant impact upon the setting or special character of the wider historic environment. In respect of flooding, the site does not fall within flood zones 2 or 3.

The site is considered to fall within a reasonably sustainable location on the periphery of Chobham, which benefits from a range of services, including a primary school, surgery and retail centre.

Key issues in respect of the site relate to matters of highways access and contamination. Site history suggests that the site was in use as a nursery in the early 1900's; subsequently, the site was utilised for landfill during the 1970's, although it is expected that the main body of landfill is contained outside of the site to the south west. Presence of contaminated land may not preclude the provision of a Gypsy and Traveller site but may have an impact upon the viability of a scheme in this location. Further evidence will need to be gathered to better understand contamination risks associated with the site and how this could affect site deliverability.

In respect of highways access, it is noted that Broadford Lane is narrow and is a designated bridleway. Surrey County Council has provided initial feedback on the site, expressing concerns in respect of the narrowness of the lane and the achievable visibility splays which may be achievable at the junction with Castle Grove Road. Surrey County Council have therefore advised that a Traffic Assessment and engineered drawings should be prepared to establish the ultimate suitability of the access.

Recommendation: Identify as a potential allocation within Regulation 18 Draft Local Plan for 13 - 16 pitches.



Undertake further research and analysis to undertake the viability implications of potential contamination risks and highways issues.



Land south west of Bonds Drive (Bonds Drive Extension)

1.57ha

GT125

The site at land south west of Bonds Drive (Bonds Drive Extension) is not affected by Tree Preservation Orders, and does not affect any built community facilities or designated sites, including Strategic Employment Sites, Green Spaces or Suitable Alternative Natural Green Spaces. The site is located over 500m from the nearest identified heritage assets (Yew Tree Cottage and Beldam Bridge Farm) and at such a distance, it is not envisaged that the site would have a significant impact upon the setting or special character of these Grade II listed buildings. There are no known contamination issues with the site.

The site could be accessed from the existing access serving Bonds Drive and no specific highways concerns have been identified, although it is noted that Pennypot Lane is relatively narrow in places.

Key issues in respect of the site relate to SNCI, flood risk and ownership.

In respect of flood risk, it is noted that the site falls within Flood Zone 2, with some areas of Flood Zone 3. Initial investigation suggests that development within Flood Zone 2 may be possible, but that the developable area would need to be reduced in order to facilitate the capacity for controlled flooding on other parts of the site. Scope for the site to viably deliver pitches alongside flood alleviation measures require further exploration.

In respect of ownership, the site is privately owned. Opportunities to purchase the site would need to be explored, however it is recognised that given the proximity of the site to the existing Travelling Showpeople site, in addition to the overriding lack of alternative sites for Travelling Showpeople use, a case could be made for the compulsory purchase of the site.

Further investigation in respect of the impact upon the SNCI will be required, including ecological surveys as part of any forthcoming development proposal.

Recommendation: **Identify as a potential allocation within Regulation 18 Draft Local Plan for 5 to 9 plots.**

Undertake further research and analysis to undertake the viability and deliverability implications of flood risk and land availability considerations, as well as ecological assessments.

