

20 September 2024



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Dear Sir / Madam,

**DRAFT SURREY HEATH LOCAL PLAN: PRE-SUBMISSION VERSION (2019 – 2038) REGULATION 19 – RESPONSE TO CONSULTATION**

We write on behalf of our client, Anglesea Capital, in response to the Draft Surrey Heath Local Plan Pre-Submission Options (Regulation 19) consultation being undertaken by Surrey Heath Borough Council. Our Client previously made representations to the earlier Regulation 18 consultation of this emerging Plan and the comments made at that stage remain relevant to this later version of the Plan.

As before, Anglesea Capital has an interest in Watchmoor Park in Camberley (see red line attached). Since the Regulation 18 consultation planning permission was granted on 14 June 2024 by Surrey Heath Borough Council for (Ref: 23/1100/FFU):

*“Hybrid planning application comprising: Full planning application for the erection of one industrial and logistics unit within Use Classes E(g)(iii), B2, and B8 together with access, parking and landscaping and Outline application (all matters reserved) for the erection of up to 19,000 sqm of flexible industrial and logistics floorspace within Use Classes E(g)(iii), B2, and B8 following demolition of existing buildings on land at Watchmoor Park”.*

Watchmoor Park is an established employment site currently located within a Core Employment Area, as designated by the adopted Surrey Heath Local Plan 2000. The Council intend to maintain the employment allocation of Watchmoor Park, as confirmed by the consultation Local Plan, which identifies it as a Strategic Employment Site. Our Client remains supportive of Policies SS1, ER1, ER2 and ER4 of the consultation Local Plan which allows for the regeneration of Strategic Employment Sites, including Watchmoor Park, across the range of B2, B8 and E(g) employment uses and supporting complementary facilities.

Our Client's interest extends to the green space located at the entrance to the park, either side of Riverside Way and immediately east of the A331. This area is currently allocated as 'Countryside Beyond the Green Belt' (CBGB) and this allocation is maintained in this Pre-Submission Version of the Local Plan. However, this area is now also proposed as a 'Local Green Space' covered by Policy IN6. It is titled 'Riverside Way' in the draft Plan.

Having reviewed the Pre-Submission Local Plan, our Client has unfortunately no option but to conclude the Local Plan does not meet the tests of soundness and must **object** to the Local Plan. In particular, our Client finds that Policy IN6 is not justified nor is it consistent with National policy in respect of the Green Space allocation of our Client's land at the entrance to Watchmoor Park.

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## Local Green Space

### Compliance with National Policy

Guidance on when an area can be designated as a Local Green Space is provided in Paragraphs 105 – 107 of the National Planning Policy Framework (NPPF) (2023). Paragraph 105 reads, “*Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.*”

The Greenspace Background Assessment outlines why this new allocation is being proposed at Watchmoor Park (Riverside Way); “*The site was previously not allocated because it is not situated within a settlement area, but due to changes in methodology it was considered for allocation. The site offers amenity value for proximal employment areas.*”

This justification is not however in compliance with the criteria for the designation of Local Green Space as set out by Government in NPPF Paragraph 106, which confirms the area should be,

- “a) in reasonably close proximity to the community it serves;*
  - b) **demonstrably special** to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
  - c) local in character and is not an extensive tract of land.”*
- [Emphasis added]

Our Client considers that the Council has not demonstrated how the proposed Green Space allocation meets criterion b). There is no qualitative evidence provided that demonstrates how or why this area is demonstrably special to the local community.

The Riverside Way areas are detached from the wider green network by the A331 and intervening development. It is wholly private land that largely acts as a landscaped entrance to this Strategic Employment Site. The ponds also act as drainage attenuation features and so have a functional rather than leisure use.

It is difficult to see how these areas could be considered to be sufficiently beautiful or historic to warrant this definition as the Council offers no evidence to support its proposed allocation. Given the private ownership these areas cannot be considered to offer any recreational value.

Given the lack of supporting evidence offered by the Council to support this allocation, Policy IN6 fails the tests of soundness enshrined in National policy as it is neither consistent with National policy nor is it justified.

On this basis the proposed allocation should be deleted from the Policies Map.

### Compliance with requirements of Policy IN6

Policy IN6 states that new development will be prevented unless, “*For sites designated for their visual amenity, it can be clearly demonstrated that the loss will not have a negative impact upon residential amenity and local character, and an element of open space will be incorporated into the development proposal.*”

Given the location and nature of the proposed Green Space allocation, it is difficult to see how this is relevant. Firstly, there is no residential amenity to affect, and local character is best considered against numerous other policies in the Local Plan.

Our Client considers that the wording of Policy IN6 simply shows how ill-fitting the proposed Green Space designation is for the Riverside Way site. The Green Space designation is quite rightly applied to areas in the vicinity such as Crabtree Park and Watchmoor Nature Reserve. These are publicly accessible areas that offer a function that benefits the local community. This is not the case on Riverside Way.

This is further evidence that the allocation of Riverside Way as Local Green Space is not consistent with national policy and therefore the Plan is not sound in this regard.

Inconsistency with Evidence Base

There is inconsistency between the proposed Policies Map and the associated Evidence Base document, ‘*Greenspace Background Assessment (2023)*’.

The Policies Map appears to show the Green Space designation covering both sides of Riverside Way, as per the extract below:



In contrast, the Greenspace Background Assessment applies the new allocation only to the area on the northern side of Riverside Way, as per the below extract:



Importantly, the Background Assessment confirms that “*The area to the south of the site is not considered for designation because it is partially outside Surrey Heath Borough Council.*”

From a review of the documentation provided in support of this consultation, it seems probable that the Background Assessment is correct, and this is simply a drafting error on the Policies Map. Nonetheless, in the event that, notwithstanding the objections made earlier in these representations, the Council continues to propose the allocation, the inconsistency between these two documents will need to be resolved by the Policies Map being changed so that it is consistent with the Greenspace Background Assessment.

Our Client also notes the Local Green Space shading on the Policies Map also overlaps the purple Employment site shading at its southern corner. Again, in the event that notwithstanding the objections made earlier in these representations, the Council continues to propose the allocation, this inconsistency will need be corrected on the submission version of the Policies Map – with the Green Space shading removed from the Employment site.

Availability of Alternative Existing Green Space in the Locality

Employees at Watchmoor Park are already well served for public green space with Crabtree Park (an existing designated Local Green Space) immediately to the southeast, which is accessible via dedicated off-carriageway footpaths.

Unlike the new proposed Riverside Green Space allocation, the subject of these representations, Crabtree Park meets the NPPF criteria, being clearly part of an existing network of green spaces serving the local community that includes the allotments and Watchetts Recreation Ground.

Countryside Beyond the Green Belt

As explained earlier in this representation, the area the subject of the proposed new Green Space designation is already the subject of an allocation as '*Countryside Beyond the Green Belt*'. Accordingly, the Council already has sufficient control over development in this area, due to the CBGB designation, to make the Green Space designation unnecessary and superfluous.

Employment Land Evidence Base

At Regulation 18 stage, our Client was concerned that the Council's employment evidence base sought to retain Watchmoor Park in office use and did not identify the opportunity for regeneration and redevelopment for alternative employment uses including for industrial and logistics.

Accordingly, our Client welcomes the conclusions of the 2023 Employment Land Assessment that there is, "[p]otential for redevelopment and intensification of vacant office premises to accommodate a wider range of employment uses, such as R&D, light industrial and industrial development (including ancillary B8)."

Policy ER4 is accordingly supportive of the intensification and redevelopment of Watchmoor Park provided there is no net reduction of employment floorspace.

Our Client welcomes the more flexible approach taken in Policy ER4 and offer it their **full support**.

Changes Sought

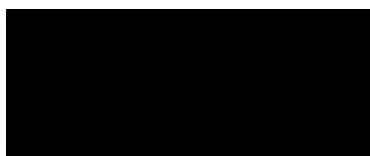
The deletion of the Riverside Way Local Green Space allocation.

Conclusion

We trust that the above comments form a useful contribution to this stage of preparation of the new Local Plan and wish to be given the opportunity to speak, on behalf of our Clients at the Examination of the Local Plan in due course

Please do not hesitate to contact me if you have any questions regarding these representations or if you require any further information.

Yours faithfully,



**Philip Brown BA (Hons) MRTPI**  
**Director, Planning**



NOTES:

SUBJECT TO STATUTORY CONSENTS

SUBJECT TO SURVEY

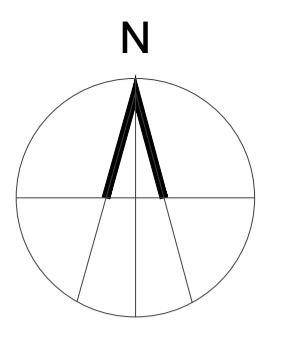
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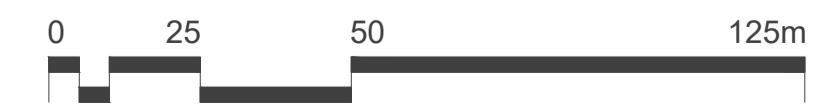
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12

**SITE LOCATION**


1:1250

LEGEND

— SITE BOUNDARY



REV	DATE	NOTE	SVS	DOD
-	29.04.2022	First Issue	SVS	DOD



**Anglesea Capital**

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TITLE  
**WATCHMOOR PARK, CAMBERLEY**

DRAWING  
**SITE LOCATION PLAN**

CLIENT  
**ANGLESEA CAPITAL LLP**

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DATE <b>APRIL 2022</b>	SCALE <b>1:1250@A1</b>	DRAWN <b>SVS</b>
	STATUS <b>PLANNING</b>	CHECKED <b>DOD</b>

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**31504-PL-01**