	<p>Surrey Heath Borough Council</p> <p>Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</p> <p>Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to: planning.consultation@surreyheath.gov.uk
OR
Planning Policy and Conservation, Surrey Heath Borough Council,
Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:
Part A – Personal Details
Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)
Please fill in a separate sheet for each representation you wish to make.

Surrey Heath Borough Council's Privacy Statement is [here](#).

Please read the separate guidance notes before completing this form.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.	
Title	C/O Agent
First Name	Mr
Last Name	Ryan
Job Title (where relevant)	Snow
Organisation (where relevant)	Associate
Address Line 1	Bell Cornwell LLP
Line 2	Unit 2, Meridian Office Park
Line 3	Osborn Way
Post Code	Hampshire
Telephone Number	RG27 9HY
	[REDACTED]

E-mail Address

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	X	
• The independent examiner's recommendations are published?	X	
• The Local Plan has been adopted?	X	

Please note that your formal comments (known as representations) and your name will be made available on the Council's website. All other details in Part A of this form containing your personal details will not be shown.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B – Please use a separate sheet for each representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

Bell Cornwell LLP

3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph

Policy

Other, e.g.
policies map,
table, appendix

4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)

Yes

No

X

4.(2) Sound (please refer to guidance notes)

Yes

No

X

4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)

Yes

No

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Pre-Submission Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. You are advised to read our Representations Guidance note for more information on legal compliance and soundness.

Please see accompanying letter which sets out that the Pre-submission Local Plan can no longer be sound on the basis that the draft NPPF, with its consultation period soon to end, will trigger a new Standard Method which should be taken into account in terms of housing numbers. It is our submission that the site at Meadow Farm can provide additional housing or commercial / employment space as a result of its redevelopment.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above.
(Please note that non-compliance with the duty to co-operate is incapable of modification at examination)
You will need to say why each modification will make the Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See statement

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate.

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



bell cornwell

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Our ref: 4490

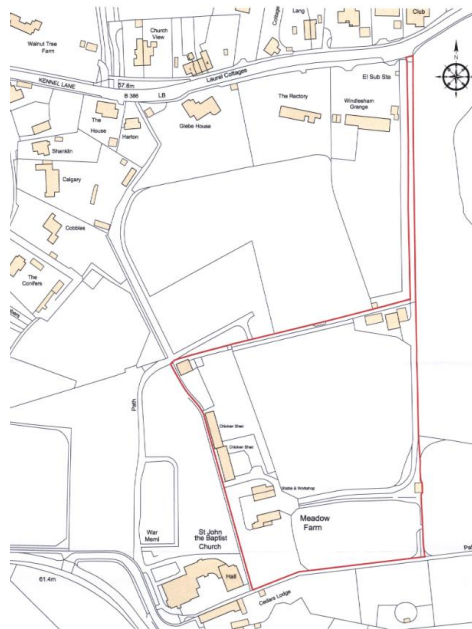
By Electronic Submission

19 September 2024

Dear Sir / Madam,

RE: Draft Surrey Heath Local Plan 2019-2039 (Regulation 19) – Representations - Meadow Farm, Kennel Lane, Windlesham, GU20 6AA

We write in response to the Council's ongoing consultation on the "Draft Local Plan 2019-2039 (Regulation 19)" to provide our comments on behalf of our client and with direct reference to the property known as Meadow Farm, Kennel Lane, Windlesham, GU20 6AA.



The site contains a former agricultural holding, now in use for a variety of uses, including residential and commercial activities, as has been the case for decades. Large sections of the site constitute Previously Developed Land (PDL) and it is located within a relatively sustainable location. The site has the potential to be redevelop and to provide for a range of uses: 1. a variety of types of housing (e.g. market, affordable,



housing for older persons, and self-build /custom build opportunities), 2. development for commercial premises such as offices, business, industrial and storage / warehousing, 3. community uses (e.g. SANG) and landscaping and biodiversity enhancement.

This statement provides Surrey Heath's Planning Policy Team with the most pertinent considerations in order to assist in taking the site forward for inclusion within the next publication of the Strategic Land Availability Assessment. This document makes it clear that the land is suitable, available, and viable for the aforementioned land uses and that development could be delivered in order to assist in meeting the areas housing and economic needs. We can confirm that the site is deliverable as defined by the Framework. We can confirm that we are open to further conversations with the Planning Policy Team in relation to the allocation of this site for future development.

Introduction

The Council is preparing a new Local Plan to cover the period to 2038. This Local Plan will set out strategic policies on issues such as housing and employment, allocation of sites for development and Development Management policies. This Plan will, on adoption, replace all of the current Development Plan policies, except any contained in Neighbourhood Plans.

In our view, it is material that during the course of the preparation of the new Local Plan, just before the current consultation commenced on the Pre-Submission Draft Local Plan 2019-2039 (Regulation 19), the Government started a consultation on the proposed reforms to the National Planning Policy Framework (NPPF) and also published a Written Ministerial Statement (WMS).

Material Consideration Section 70(2) Town and Country Planning Act 1990 requires local planning authorities when determining planning applications *"to have regard to the provisions of the development plan so far as is material to the application and to any other material considerations"*

By virtue of section 79(4) Town and Country Planning Act 1990, section 70(2) applies to the determination of appeals by the Planning Inspectorate and the Secretary of State for Housing Communities and Local Government.

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 provides: *"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise"*

It is clear following the cases of Oxford Diocesan Board of Finance v SoS for Communities and Local Government and Wokingham B.C., 2013 EWHC 802 (Admin) and Cala Homes (South) Ltd, R (on the application of) v Secretary of State for Communities and Local Government and anor 2011 EWCA Civ 639 that a written ministerial statement and the consultation draft NPPF as a matter of law is a material consideration.

Weight to be attached

Until the new NPPF is adopted the previous NPPF (December 2023) remains as national policy. Nevertheless, the draft NPPF and accompanying written ministerial statement (WMS) are material considerations and indicate the direction of travel for national policy. As the draft NPPF is still subject to consultation and the precise wording may change, we assign it moderate weight at this stage (on a scale of limited – moderate – considerable – substantial) as the Government's intentions are clear. However, as the WMS takes effect immediately and remains in force until it is withdrawn, we argue it carries full (substantial) weight.



Comments On The Draft NPPF And Written Ministerial Statement

The opening paragraphs of the WMS outline that ‘*decisive reform*’ is needed to address the housing crisis in the UK, with the new government committing to deliver 1.5 million homes over the next 5 years to ‘*improve affordability*’ and ‘*turbocharge growth*’.

The reforms proposed are set out in the draft NPPF (for clarity the new or amended sections of the draft NPPF are highlighted in green and underlined).

Draft paragraph 11(d) relates to the presumption in favour of sustainable development and states:

- d) where there are no relevant development plan policies, or the policies for the supply of land⁸ which are most important for determining the application are out-of-date⁹, granting permission unless:

Chapter 5 of the draft NPPF proposes the introduction of a new standard method for calculating the number of homes needed in an area. This results in the annual housing requirement figure for Surrey Heath going from 320 dwellings to 658 dwellings, an annual net addition of 389 dwellings.

Paragraph 226 (below) of the draft NPPF is proposed to be deleted:

~~226.— From the date of publication of this revision of the Framework, for decision-making purposes only, certain local planning authorities will only be required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing (with a buffer, if applicable, as set out in paragraph 77) against the housing requirement set out in adopted strategic policies, or against local housing need where the strategic policies are more than five years old⁸¹, instead of a minimum of five years as set out in paragraph 77 of this Framework. This policy applies to those authorities which have an emerging local plan that has either been submitted for examination or has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need. This provision does not apply to authorities who are not required to demonstrate a housing land supply, as set out in paragraph 76. These arrangements will apply for a period of two years from the publication date of this revision of the Framework.~~

The proposed removal of this paragraph is pertinent in this case as it will mean that Council's which currently need to provide a minimum of four years' worth of housing, will need to provide a minimum of five years' worth of housing.

In relation to the emerging Local Plan, the WMS makes clear that plans at an advanced stage (Regulation 19) will **not** be allowed to continue to examination where there is a significant gap between the plans and the new housing need figure, stating:

'for plans at an advanced stage of preparation (Regulation 19), allowing them to continue to examination unless there is a significant gap between the plan and the new local housing need figure, in which case we propose to ask authorities to rework their plans to take account of the higher figure'

The WMS and draft changes to the NPPF strengthen the case in support of the allocation of the site at Meadow Farm for redevelopment to assist the Local Planning Authority in its delivery of housing and / or commercial uses.



A key reform in the WMS and draft NPPF is to make more effective use of brownfield land and increase the density of development in sustainable locations. The site at Meadow Farm clearly aligns with these aims and could make a valuable contribution towards local housing supply, as well as delivering other social, economic and environmental.

The specific changes to Green Belt policy will be discussed later in this statement.

Policy Context

Surrey Heath currently has one 'made' Neighbourhood Plan covering the Parish of Windlesham. This Plan also forms part of the Development Plan for the Borough.

The Windlesham Neighbourhood Plan 2018-2028 was 'made' at SHBC Full Council on 12 June 2019. Windlesham Neighbourhood Plan (WNP) sets out a vision for Windlesham village that reflects the thoughts and feelings of local people with a real interest in their community. The vision is for Windlesham to retain its semi-rural character, while being recognised as a place to live and work that offers an unparalleled opportunity to be part of a community and provides a friendly and safe environment surrounded by areas of natural beauty.

SHBC Core Strategy and Development Management Policies Development Plan 2012-2028 include a growth figure for housing in Windlesham of 1%-2%. This is the development plan to which this Plan must generally conform as a requirement of the Basic Conditions. There has been no consultation on a review of this plan. This figure translates to approximately 20-50 dwellings being constructed within the period of the strategy document. This level of growth has already been exceeded with development of the Old Dairy site and permission granted for the erection of up to 140 new dwellings and community facilities on the Housing Reserve site known as Heathpark Woods.

The Windlesham Neighbourhood Plan sets out that the community supports sustainable housing growth in the village, at an organic rate, which this Plan defines as "sustainable growth of 1-2%". This will be primarily on brown field and pre-used sites, some of which could be located in Settlement Areas. The replacement of large properties in the Green Belt with a small number of new houses could provide a second significant source. Windfall sites, by nature, are not predictable but are sure to arise.

The Neighbourhood Plan acknowledges that existing brown field sites are likely to provide the major source of house building sites. A previous publication of the Surrey Heath Strategic Housing Land Availability Assessment identified twelve potential brownfield sites which were identified and researched, with 11 considered viable.

The site at Meadow Farm offers an opportunity to make a unique contribution to the target number of homes and economic development for Windlesham. Whilst at this stage, the site may constitute a windfall site, the Neighbourhood Plan recognises that unpredictable windfall opportunities provide a welcome bonus to delivery within the Plan area.

Site Description

Meadow Farm is located between the two settlement areas of Windelsham, within the Windlesham Church Road Conservation Area.

The site comprises a former farmyard with an existing residential dwelling and garaging, several barns which have been in various commercial uses, workshops, stables and associated grazing land.



The buildings across the site feature a mixture of typical corrugated metal cladding, brick and timber. The former Farmhouse, which is located to the south western corner of the application site, is of a traditional Surrey vernacular.

The grazing land to centre of the site has been divided to form paddocks.

The only immediate neighbouring buildings to the site are at St. John the Baptist Church (Grade II Listed) and St. John's Church Hall, which are sited to the south west, beyond a substantial belt of mature vegetation.

Planning History

In terms of recent planning history, the Council's records detail the following:

LPA ref. 13/0831 - Application under Class M, Part 3, Schedule 2 of the Town and Country Planning (General Development Order) for the prior notification of Change of Use of Agricultural buildings to class B8 (Storage & Distribution). Refused on 13th January 2014.

LPA ref. 14/0342 - Application under Class M, Part 3, Schedule 2 of the Town and Country Planning (General Development Order) for the prior notification of the change of use of Agricultural buildings to Class B8 (Storage & Distribution). Approved on 3rd June 2014.

Potential for Future Site Allocation

We set out below the key planning considerations for bringing the site forward for redevelopment. The site is subject to the following planning constraints:

- Green Belt
- Windlesham, Church Road Conservation Area.

We believe the key planning considerations in relation to allocating the site for future redevelopment can be summarised as follows:

- Principle of Development
- Previously Developed Land
- Location of the Site / Accessibility
- Impact on Visual Amenity and Heritage Considerations
- Other matters (technical matters)

Having reviewed the planning history, constraints and considered the Local Planning Authority's Development Plan, we have provided this statement together with a detailed set of drawings, in order to assist with your assessment of the scheme for future allocation. We will address the key considerations in turn.

Principle of Development

As set out above, the site is located within the Green Belt as identified in the Local Plan. The NPPF continues to protect against inappropriate development. Inappropriate will not be permitted unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential



harm to the Green Belt by reason of inappropriateness, and other harm is clearly outweighed by other considerations. This is in accordance with Paragraphs 152 and 153 of the NPPF.

In respect of the construction of new built form in the Green Belt such as this it will constitute inappropriate development unless it falls within the list of exceptions identified in the NPPF (2023). This includes Para 154 (e) limited infilling in villages; (g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

It should be noted that the draft NPPF, at paragraph 151 (formerly 154), now states the following: limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), **which would not cause substantial harm to the openness of the Green Belt.**

- ~~– not have a greater impact on the openness of the Green Belt than the existing development; or~~
- ~~– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.~~

In addition, it also sets out at paragraph 152 that housing, commercial and other development in the Green Belt should not be regarded as inappropriate where:

- a. The development would utilise grey belt land in sustainable locations, the contributions set out in paragraph 155 below are provided, and the development would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole; and
- b. The local planning authority cannot demonstrate a five year supply of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 76) or where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years; or there is a demonstrable need for land to be released for development of local, regional or national importance.
- c. Development is able to meet the planning policy requirements set out in paragraph 155.

The demonstrates the approach the Government is taking in terms of releasing poorly performing Green Belt sites for redevelopment. The site at Meadow Farm would undoubtedly constitute a poorly performing Green Belt site when tested against the purposes of the Green Belt. Furthermore, large sections of the site already constitute PDL.

Previously Developed Land

The NPPF defines previously developed land as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where



provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

In light of the change in planning history it is evident that the use is no longer agricultural in nature and is in fact more akin with various commercial uses now assigned under Class E of the Use Classes Order. The buildings/structures and identified curtilage is therefore previously developed land.

Location of the Site / Accessibility

The NPPF sets out the Government's planning policy for England and places sustainable development at the heart of the decision-taking process incorporating objectives for economic, social and environmental protection. These objectives seek to balance growth and local community needs against protection of the natural, built and historic environment.

For rural housing, paragraphs 82-84 of the NPPF are the most relevant to the consideration of this proposal for a new dwelling. Paragraph 83 of the NPPF states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the viability of rural communities.

The site at Meadow Farm comprises built form and is located off Church Lane. Church Lane has a number of dwellings. The site is considered to be located within an area of low density dwellings. On this basis, it is considered that the application site is not physically isolated in terms of built form. Windlesham is a village, which has a number of services such as public houses, a Church, commercial uses, village shop, post office, pharmacy, hairdressers, preschool and Day Nursery, infants school and the site is located only 120m from the nearest settlement boundary with a bus stop opposite the site (bus 500) from Staines to Frimley Park Hospital via Egham, Sunningdale, Lightwater, Bagshot and Camberley. With ongoing travel via their associated train stations. In light of this, the site is relatively well located and the redevelopment would achieve a sustainable form of development.

Impact on Visual Amenity and Heritage Considerations

Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 explains that the council should ‘determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desired to preserve or enhance’. Regarding listed buildings, Section 66(1) of the same Act sets out that ‘in considering when to grant planning permission which affects a listed building or its setting, the local planning authority ... shall have special regard to the desirability of preserving the buildings or its setting ...’. Section 72(1) of the same Act then goes on to state that, ‘in the exercise, with respect to any buildings or other land in a conservation area ... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.

Paragraph 203 of the NPPF sets out that in determining planning applications, local planning authorities should take account of: a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) The desirability of new development making a positive contribution to local character and distinctiveness.

In considering the potential impacts, paragraph 205 states that, ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is



irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’.

As already set out, the site is located within the Church Road Conservation Area and to the north east of St. Johns Baptist Church (Grade II Listed).

The NPPF goes on to set out the tests for substantial harm and less than substantial harm (paragraphs 207, 208, and 209). Relating to this proposal, the development could not reasonably result in substantial harm to the heritage assets (in terms of listed buildings, this is generally reserved for partial or complete demolition), therefore any harm could only be considered as ‘less than substantial harm’, if there is any harm identified. Paragraph 202 sets out that ‘where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’.

Policy DM9 and Policy WNP2.1, WNP3.1 and WNP3.2 of the Neighbourhood Plan are policies of general application relating to the assessment of the proposal against its impact.

Policy DM17 requires development which affects any Heritage Asset should first establish and take into account its individual significance and seek to promote the conservation and enhancement of the Asset and its setting.

In this instance, the site is not easily visible from the public domain. It does not form a prominent feature within the setting of the Conservation Area. The significant boundary vegetation separates it from St. Johns Baptist Church to such an extent that it is not viewed within its context. As such, it is considered that the redevelopment of the site could be sympathetic to the Windlesham Conservation Area and associated heritage assets in accordance with paragraph 199 of the NPPF and Surrey Heath Core Strategy & Development Management Policies.

Other matters (technical matters)

Policy DM10 seeks to manage flood risk. The site is not located within Flood Zone 2 or 3 and is within Flood Zone 1. The Council’s SFRA does not identify the site has been subject to historical Fluvial flooding or from surface water flooding with probable capability for infiltration SuDs with limited potential for ground water flooding.

The site could be developed without impacting on any nearby mature trees or other natural features which are located on the site boundaries. It would be proposed to further landscape the site, including planting quality stock trees and native hedgerows. These can be secured by way of a suitably worded condition. These matters would be dealt with by way of a submitted Arboricultural Report and Pre-Development Tree Condition Survey.

Policy CP14A seeks to conserve and enhance biodiversity within Surrey Heath, and states that development that results in harm or loss of features of interest for biodiversity will not be permitted. The land can be developed, whilst retaining large areas of meadow which can be further enhanced to provide Biodiversity Net Gain on site, therefore contributing positively to wildlife by delivering more habitat, in a better condition than before. Subject to the appropriate ecology reports and mitigation and enhancement measures secured by condition, we are confident that there would be no technical reasons why the development could not be supported in terms of ecology.

In terms of vehicular access, the design of the proposed access and the associated visibility splays would be carried out having regard to guidance that is set out within the Design Manual for Roads and Bridges



(DMRB) and guidance set out within Manual for Streets 2 (MfS2). On that basis it is concluded that the access can provide an appropriate access strategy for additional development on land.

Conclusion

The Council must accept that the draft NPPF revisions, including the new Standard Method, will require it to deliver additional housing and commercial development across the district. It will also be required to utilise sites within the Green Belt that are poorly performing in terms of the five purposes.

As part of preparing for the new Local Plan for Surrey Heath, this current Reg 19 consultation provides an opportunity for the Council to engage proactively to address the potential shortfall.

It has been set out that the redevelopment of the site at Meadow Farm would be policy compliant. This statement provides Surrey Heath's Policy Team with the most pertinent considerations in order to assist in taking the site forward for allocation. We also consider that there are material planning considerations in favour of the allocation of this site, which include the following:

- Whilst acknowledging the site is outside of the defined settlement boundary, the proposal would have a close physical and visual relationship to existing residential development.
- The site would have good access to Windlesham's facilities and services and thus help sustain an inclusive mixed community.
- The redevelopment would encompass an area which is regarded as previously developed or 'brownfield' land.
- The redevelopment would not encroach into the open countryside beyond the existing established line of development within the immediate area and would provide a much-improved landscape.
- The extent and quantum of development envisaged are considered acceptable.
- The redevelopment of the site would make effective use of the site whilst respecting the character and setting of the site's location.
- The proposal could safeguard the amenity and privacy of nearby residential occupiers, with more than satisfactory separation distances and relationships being achieved.
- Subject to technical work relating to trees, infrastructure or ecology, the scheme could be delivered with no technical concerns.
- Satisfactory vehicular access can be achieved without material harm to highway safety.
- Subject to the implementation of a number of biodiversity mitigation and enhancement measures the ecological interests of the site can be safeguarded and meet the overall objectives of the NPPF.

In light of the above, we submit that the land Meadow Farm should be considered as part of the next Strategic Land Availability Assessment and allocated for future development as part of Surrey Heath's emerging Local Plan update. We look forward to hearing from the Planning Policy Team in due course.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

BELL CORNWELL LLP

RYAN SNOW
BSc(Hons) MSc MRTPI
Associate

