



Planning Policy and Conservation Team  
Planning Services  
Surrey Heath Borough Council  
Surrey Heath House  
Knoll Road,  
Camberley

By email to: [planning.policy@surreyheath.gov.uk](mailto:planning.policy@surreyheath.gov.uk)

19th September 2024

Dear [REDACTED],

**Pre-Submission Surrey Heath Local Plan 2019 – 2038  
Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations**

Thank you for your email dated 7<sup>th</sup> August notifying us of the above consultation. This Council's comments are set out below.

**Housing needs**

It is noted that Surrey Heath's housing need target, as based on the current standard method, is 321 homes per year over the plan period. There is no unmet need for housing in Surrey Heath, as Hart District Council agreed to accommodate 41 dwellings per year up to 2032 through the Duty to Co-operate and the Hart Local Plan Examination.

**Gypsy and traveller needs including travelling showpeople**

It is acknowledged that there is unmet need for gypsy and traveller and travelling showpeople accommodation in the Borough. This is to be addressed through a flexible policy approach which is to include setting out clear criteria against which planning applications relating to non-allocated sites can be assessed. There is also a requirement for larger sites (over 100 gross dwellings) to make provision for gypsy and travellers and travelling showpeople. A criteria based policy is included which covers affordable pitches for gypsies and travellers on rural exception sites.

It is considered that the protection of existing sites and the use of conditions (please note that the reference to conditions in Policy H11 included under criterion 5 seems to be to all traveller

**PLACE DIRECTORATE**

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD  
T: 01344 352000 [www.bracknell-forest.gov.uk](http://www.bracknell-forest.gov.uk)

sites but the subheading infers that this criterion only relates to travelling showpeople) are pragmatic ways of trying to maintain the supply.

You will be aware from previous duty to cooperate discussions that Bracknell Forest also has unmet need for permanent pitches and is therefore unable to assist with meeting any of Surrey Heath's unmet needs.

### **Economic development needs**

The employment floorspace needs of the Borough are to be addressed through protecting and supporting employment uses within designated Strategic and Locally Important Employment Sites. Support is also to be given to new employment uses, at suitable locations beyond these areas.

Para. 4.12 confirms that there is no Borough-wide capacity for new retail floorspace (convenience or comparison), taking into account existing commitments and vacancy. There are therefore no unmet retail needs during the plan period.

It is considered that Policy ER7 criterion 3 (Impact Assessment) might benefit from the addition of some of the wording from para. 4.107. Depending on the scale and location of any development requiring an impact assessment, 'planned public and private investment' (para 94a of the NPPF) may also need to be considered in respect of Bracknell Town Centre and some local centres in Bracknell Forest, due to ongoing regeneration. The expansion of Criterion 3 would help ensure consistency with the NPPF and therefore soundness.

There also appears to be some tension between Policies ER7 and ER8 (criterion 5) in that the former allows main town centre uses in designated centres (including district and local centres), whereas the latter states that main town centre uses in district and local centres need to satisfy a number of criteria in order to be permitted.

### **Green infrastructure including SANG**

It is noted that sufficient provision has been made to mitigate the impact of proposals on the Thames Basin Heaths SPA and that there is no request for further SANG capacity to be provided by this Council.

In the interests of taking a consistent approach to development and impact on the integrity of the SPA, three comments are made in respect of the wording of Policy E1. The first point relates to criterion 2 which refers to the fact that 'net new residential development will not be permitted within the 'exclusion zone' set at 400m linear distance from the SPA boundary'. It is suggested that this may need modifying as some Use Class C2 residential development is allowed within this area. Secondly, Criterion 3 of the same policy appears to contradict Criterion 1 by referring to all new residential development within 5km of the designation.

Finally, it is considered that the wording of Criterion 5 should be tightened in the interests of soundness due to the reference to 'alternative measures'. It is queried what these might constitute. Furthermore, they would need to be agreed by Natural England rather than the current reference to 'the Council'. Surrey Heath Borough Council should not approve any application with an outstanding objection from Natural England.

### **Transport**

## **PLACE DIRECTORATE**

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD  
T: 01344 352000 [www.bracknell-forest.gov.uk](http://www.bracknell-forest.gov.uk)

The Transport Assessment concluded that there are no significant adverse effects on the highways network in Bracknell Forest, arising from Surrey Heath Borough Council's site allocations. No strategic concerns are therefore raised on this issue.

If you have any queries regarding this letter, please do not hesitate to contact the Development Plan Team: [REDACTED].

Yours faithfully,

[REDACTED]

Jo Male  
Assistant Director: Planning

## **PLACE DIRECTORATE**

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD  
T: 01344 352000 [www.bracknell-forest.gov.uk](http://www.bracknell-forest.gov.uk)