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Introduction

- I.1. Surrey Heath Borough Council published the Pre-Submission Surrey Heath Local Plan for comment between 7th August and 20th September 2024. This document sets out a summary of the main issues raised from any comments received and the Council's summary response. It is prepared in accordance with the requirements of Regulation 22 (1)(c)(v) of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.
- I.2. The document is arranged in Policy order reflecting the structure of the Pre-Submission Local Plan. This document should be read in conjunction with the Council's Consultation Statement Update, December 2024 which summarises the publicity arrangements which were undertaken on the Pre-Submission Local Plan, and the Council's Proposed Main Modifications document. This sets out suggested changes to the Local Plan, largely arising from the representations received, for consideration by the Local Plan Inspector during the Local Plan Examination.
- I.3. Further information on the Submission of the Surrey Heath Local Plan and the Examination can be found on the Council's [Local Plan webpage](#).



Main Issues raised in response to the Pre-submission Surrey Heath Local Plan (2019-2038): Regulation 19

Table 1: Whole Plan/General Issues

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Overall Approach	Comment that the Plan is well written and contains robust policies to ensure environmentally sustainable development and growth. However as set out under Policy IN1 the Plan is considered to be unsound on the basis that it is not justified and consistent with national policy due to updates needed to some parts of the evidence base.	Environment Agency (19283937)	Comments noted. As set out in response to comments on IN1 and in the agreed Statement of Common Ground updated relevant evidence has been prepared/is underway.
Overall Approach	Support the Plan.	Woking Borough Council (19304737); Rushmoor Borough Council	Noted.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
		(55790913)	
Plan Review	The Plan should include a review Policy/be reviewed and revised to take account of the proposed new NPPF.	UCB (39605953); Home Builders Federation (20211169)	The Local Plan is Submitted in accordance with the current NPPF (2023). Subject to the publication date of the new NPPF the Local Plan will alternatively be Submitted in line with the proposed transitional arrangements set out in the consultation document, which allows for any plan submitted for examination prior to publication of the NPPF plus one month, to be examined under the NPPF 2023. A more detailed response on the draft NPPF consultation is set out in Table 3.
Duty to Cooperate	Consider that all Surrey authorities should be listed as housing partners in the Duty to Cooperate Scoping Report.	Tandridge District Council (19301857)	All Surrey Authorities are listed as partners under the 'Housing' Matter in the Scoping Report, 2020 and have been engaged at appropriate stages in the plan-making process. This matter has been resolved with Tandridge DC as set out in the Duty to Cooperate Compliance Statement update.
Local Governance	Suggests that the governance of Windlesham should revert back to be locally governed.	Trevor Sleep (55593057)	This is not within the scope of the Local Plan.
Local Plan Preparation	Supports a plan-led system but is concerned about the amount of time it takes to adopt a	Tony Murphy (19285441)	The plan-making process is set out in regulations but is also affected by factors such as changes to



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	new Local Plan with concerns that development is driven by developers and their commercial interest and there is a lack of urgency on environmental matters. Notes that there is no commitment for a review.		national policy and the need to develop a robust evidence base.
Local Plan Preparation and Accessibility	Does not consider that the Plan is sound. The Plan is not legally compliant as the style and complexity is unsuitable for a significant percentage of residents, and there is limited awareness by hard-to-reach groups. Questions deliverability of the Plan's aspirations and a business approach should be adopted to prioritise these.	David Chesneau (19291009)	Engagement on the Local Plan is consistent with the Council's Statement of Community Involvement. The Council has used a variety of methods to engage different groups in the Borough including direct mailing to organisations representing hard-to-reach groups. It is acknowledged that language used within the Plan is technical in places by necessity, however the Council has endeavoured to make the Plan as accessible as possible. As supported by Topic Papers and the evidence base, the Council considers that the Plan is deliverable.
Neighbourhood Plans	Considers that SHBC has failed to take account of the Windlesham Neighbourhood Plan and the Local Plan is therefore not compliant with the NPPF or the Duty to	Windlesham Heathpark Wood Group (19294977)	The Council fully supports local communities preparing Neighbourhood Plans. The spatial strategy focuses development in the west of the Borough but the preparation of the new Local Plan



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	<p>Cooperate. Suggests the plan is not positively prepared, by not taking account of current housing obligations within the plan period whilst placing further burden on Windlesham by allocating sites that have already been refused planning permission. The need for 'conformity' is not a one-way street.</p>		<p>must meet the identified housing needs over the new Plan period which runs to 2038. In view of the constrained nature of the Borough some sites outside of the western part are required to meet this need.</p>



Table 2: Introduction, Context, Vision and Objectives

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Context	Suggested minor wording changes regarding Surrey County Council's Minerals and Waste Planning remit and plan development timeframes.	Surrey County Council (19304577)	As set out in the agreed Surrey County Council Statement of Common Ground Update, the Council agrees for accuracy that it would be beneficial to update the Minerals and Waste references and an additional (minor) modification is proposed to Paragraph I.12.
Objectives	Support for the strategic Objectives.	West End Village Society (19291073); Network Rail (55788833); Tandridge District Council (19301857)	Support noted.
Vision	Support the introductory Paragraph to the Vision (Para I.65) although questions whether the use of 'seeking' is an unnecessary political qualification at odds with the NPPF.	Tony Murphy (19285441)	Support noted.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Vision	Support the vision.	Tandridge District Council (19301857)	Support noted.



Table 3: Policy SSI: Spatial Strategy

Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
Plan Period	<p>A number of respondents consider the Plan period unsound on the basis that it is not considered justified, not positively prepared, effective and/ or consistent with national policy.</p> <p>Respondents set out that the Plan period should start later, with the majority suggesting a 2023/24 start year and others suggesting a 2024/25 start year. The justifications put forward for this included:</p> <ul style="list-style-type: none"> • Start year should reflect evidence, such as affordability ratios from the standard method, reflecting an approach adopted by Inspectors for other Local Plans. • Starting six years before adoption with 59% of dwellings complete or permitted does not meet future needs and instead the Plan should look forward. • Earlier start to the Plan provides an artificial boost to housing supply. 	<p>Bloor Homes (55790785); Home Builders Federation (20211169); Knowles Property Group (55796353); Lavignac Securities (55781537); Persimmon Homes Thames Valley (39477697); Philip Marsden (55785057); Redrow Homes</p>	<p>Having regard to the evidence base and the need to get an up-to-date Plan in place as soon as possible, the Council considers that the Plan period is appropriate. Whilst there have been delays in progressing the Plan due to factors including changes to national policy, ensuring that there is sufficient SANG capacity and exploring robustly all options for deliverable Gypsy and Traveller and Travelling Showpeople sites, it is noted that the NPPF (2023) states that 'Strategic policies <u>should</u> look ahead over a minimum 15 year period from adoption..'. It is therefore considered that the 15-year plan period is <u>not</u> a legal requirement and not a national policy requirement. A shorter plan period is justified by local circumstances.</p> <p>The Plan period reflects the dates of much of the evidence base and to extend the Plan period would cause further delays and require updates to evidence. In view of the date of adoption of the existing Development Plan, the Council considers</p>



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
	<p>Respondents also identified that the Plan period should be extended, with suggestions ranging from a minimum of a 2040 end year to a 2042 end year. The justifications for this included:</p> <ul style="list-style-type: none"> • Does not accord with national policy which states Plans should cover 15 years from adoption, with some identifying this as a fundamental flaw. • Due to delays in Plan preparation, the current Plan period is no longer relevant. • References to Local Plan Examinations where Plan periods were extended by the Inspector. <p>Respondents identified the following implications for bringing forward the start year and extending the plan period:</p> <ul style="list-style-type: none"> • Results in a shortfall in supply, with some noting this to be in the region of 900 to 1300 homes, dependent on if unmet need delivery in Hart is included. 	<p>Southern Counties (50298177); Rumsby Investments Ltd (55796385); SCWW3 Limited (55659233); Somerton Development Projects (39484257); Thakeham Homes (20198241); Vistry Group (55796577)</p>	<p>that it is important to get an up-to-date Plan in place as soon as possible. With regards to this the Council also notes that under the proposed transitional arrangements set out in the consultation NPPF, 2024, the Council would be expected to commence plan-making in the new plan-making system at the earliest opportunity after adoption. The Council also considers that as the identified housing supply is considerably front loaded, as demonstrated in the housing trajectory and Housing Supply Topic Paper, housing delivery would not be affected prior to the requirement to prepare a new Local Plan. Having an up-to-date adopted Local Plan as soon as possible provides greater certainty in progressing strategic housing allocations as well as providing an up-to-date planning policy framework for other matters such as affordable housing and climate change.</p> <p>Having regard to these factors, the Spatial Strategy and options tested through the Sustainability Appraisal have all been considered against a 2019 to 2038 Plan period. The Council is also aware that it is not uncommon for Local Plans to be adopted</p>



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
	<ul style="list-style-type: none"> Resultant shortfall requires review of site allocations, reasonable alternatives and Green Belt prior to submission. Addressing resultant shortfall now avoids the need for an immediate Local Plan review. 		with less than 15 years left to run. Notably, one example is Bracknell Forest Borough Council which adjoins Surrey Heath and adopted their Local Plan in March 2024 with 13 years left to run.
Hart unmet need objection	<p>Objections and concerns raised on the soundness of relying on unmet need delivery from Hart District Council. Respondents raised the following points:</p> <ul style="list-style-type: none"> In light of the new proposed standard method significantly increasing housing needs in Hart and the Hart Local Plan reaching five years from adoption in April 2025, unmet need delivery from Hart can no longer be relied upon and should be omitted. Currently no evidence unmet need remains relevant. If unmet need is determined to still be relevant, the Council will need to have demonstrated constructive engagement with Hart prior to 	<p>Home Builders Federation (20211169); Knowles Property Group (55796353); Lavignac Securities (55781537) Persimmon Homes Thames Valley (39477697); Rumsby</p>	Hart District Council and Surrey Heath Borough Council have engaged constructively and on an ongoing basis under the duty to cooperate as evidenced by the Submission Statement of Common Ground (SCG) with Hart, signed on the 1 st November 2024, which confirms the commitment to addressing unmet need.



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	<p>Submission to comply with Duty to Cooperate. Failure to do so will result in the Plan not being legally compliant.</p> <ul style="list-style-type: none"> Resultant reduction in delivery of unmet need in Hart will result in a shortfall of housing supply. This means the Council will need to explore all reasonable alternatives including the Green Belt. The Plan should meet housing needs in full. 	<p>Investments Ltd (55796385); Somerton Development Projects (39484257); Thakeham Homes (20198241)</p>	
Hart unmet need	<p>Sets out that 533 homes of unmet need are to be delivered within Hart reducing the Surrey Heath Local Plan housing requirement to 5,578 homes. Due to the Hart Local Plan housing trajectory being front loaded, completion data identifies that Hart has already delivered the 533 homes of Surrey Heath's unmet need. Evidence to support this was submitted as part of the representation and a modification to the Plan requested. Notes that there is a strong record of cooperation between the two authorities.</p>	<p>Hart District Council (19285377)</p>	<p>This matter has been discussed at the duty to cooperate meeting on 8th October 2024. SHBC has agreed to suggest a proposed Main Modification to Paragraph 2.7 of the Local Plan to the Inspector, as set out by Hart District Council and as evidenced by the Submission Statement of Common Ground.</p>



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
Uncapped Housing Need	The Plan is not positively prepared as it fails to address the uncapped housing need (345 dwellings per annum). The Council's current approach of planning for a figure lower than local housing need is contrary to Government guidance. The Plan should meet housing needs in full.	Knowles Property Group (55796353); Lavignac Securities (55781537); Rumsby Investments Ltd (55796385)	The Local Housing Needs Assessment 2024 concluded that the Standard Method is a reasonable assessment of housing need for Surrey Heath. The cap is applied as part of the Standard Method calculation, as advised as part of Planning Practice Guidance.
Housing Need	Notes approach to meeting housing needs.	Bracknell Forest Council (55780769)	Noted.
Housing requirement and affordable housing	There is substantial need for affordable housing, supported by LHNA, historic shortfalls in delivery and market signals that indicate a housing affordability crisis. This is not met by the Plan and viability challenges and therefore the housing requirement is not appropriate.	Somerton Development Projects (39484257); Thakeham Homes (20198241)	There is no requirement in NPPF or PPG on the Council to meet affordable housing need in full, but the Council seeks to deliver as much affordable housing as possible on suitable sites, as set out in Policy H7. The LHNA (2024) concluded that there should not be an uplift in the housing requirement from the



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
			<p>standard method calculation for the Local Plan local housing need figure. Furthermore, the LHNA concludes that the standard method is appropriate for the Borough.</p> <p>While the affordable housing need is high the link between affordable housing need and overall need is complex, as recognised by the Planning Advisory Service and there are several reasons for this.</p> <p>Furthermore, Section 106 contributions are not the only sources of supply of affordable housing. Some sites will be delivered as 100% affordable homes while other programmes will also increase the supply of affordable housing.</p> <p>Overall, therefore there is no need to increase the housing requirement to address affordable housing need, but the need is high enough to justify the Council seeking as much affordable housing as viability allows through Policy H7.</p>



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
Housing supply	<p>A number of objections and soundness issues are raised in respect of the Local Plan housing supply, including:</p> <ul style="list-style-type: none"> • Is not proactive in identifying opportunities for development in suitable locations, such as discounting suitable sites that are deliverable, reducing the scope of the Plan to meet local needs. • The proposed Plan will only meet a fraction of the needs, highlighting affordable housing needs and a lack of supply to meet this. • The majority of housing is likely to be delivered by 2028, leaving 200 homes being delivered per annum for the remainder of the Plan. This does not align with the stock based approach of the NPPF consultation. 	<p>Philip Marsden (55785057); Thakeham Homes (20198241); Home Builders Federation (20211169)</p>	<p>The Local Plan identifies sufficient supply to meet the Local Plan housing requirement. Section 3 of the Housing Supply Topic Paper (2024) sets out a detailed summary of the detailed work completed in advance of the Pre-Submission Plan to identify sufficient housing to meet the housing requirement. There is no requirement in the NPPF or PPG on the Council to meet affordable housing need as identified in the LHNA 2024 in full, but the Council seeks to deliver as much affordable housing as possible on suitable site as set out in Policy H7. The Local Plan is Submitted in accordance with the current NPPF (2023). The Council notes that the housing supply is front loaded, and this provides greater certainty for delivery.</p>
Housing Supply – Green Belt Exceptional Circumstances	<p>A number of objections and soundness issues are raised in respect of Local Plan housing supply and Green Belt exceptional circumstances, including:</p>	<p>Redrow Homes Southern Counties</p>	<p>The Council has concluded that exceptional circumstances do not exist for Green Belt release to meet housing needs for the reasons set out within the Green Belt Exceptional Circumstances Topic Paper. The approach taken is in alignment</p>



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
	<ul style="list-style-type: none"> In view of the need to extend the plan period, opportunities to address the shortfall should be considered, including review of sources of supply in the Green Belt; Exceptional circumstances warrant Green Belt release; The NPPF 2023 does not absolve the Council from considering whether exceptional circumstances exist for Green Belt release. The pressing need for affordable housing is exacerbated by the Council's decision not to amend boundaries; Revisions to the Green Belt boundary establish the principle for further alterations to the Green Belt boundary. Exceptional circumstances can be demonstrated for removal of additional land from the Green Belt, including land of Broadley Green; 	(50298177); Somerston Development Projects (39484257); Thakeham Homes (20198241); Home Builders Federation (20211169); Lavignac Securities (55781537); Vistry Group (55796577); Rumsby Investments Ltd (55796385); Knowles Property	with the NPPF 2023. Revisions to the Green Belt boundary do not necessarily establish the principle for further alterations to the Green Belt boundary; whether there are exceptional circumstances to release land for different uses requires an exercise of planning judgement, in which regard should be had to appropriate evidence as relevant.



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	<ul style="list-style-type: none"> • Significant exceptional circumstances exist (authority wide and site specific) relating to Fair Oaks; • Failing to assess available Green Belt sites is contrary to Government guidance; • Fails to boost housing supply, should allocate more sites including Green Belt release to future proof the Plan. A number of omission sites are referenced in relation to this. • Sites in the east imperative to for meeting affordable housing needs, relating to Green Belt release. • The Council will have to review its Green Belt boundaries in a more robust manner to meet the uplift in housing need that results from a correct plan period. 	Group (55796353); Persimmon Homes Thames Valley (39477697); Philip Marsden (55785057)	
Housing Supply – SLAA sites in Green Belt and Countryside	There is no evidence demonstrating the supply is deliverable, particularly where sites are retained in the Green Belt/countryside beyond the Green Belt.	Lavignac Securities (55781537)	Retention of housing and employment sites within the Green Belt would not preclude appropriate development or affect expected delivery as set out within the SLAA.



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
Housing supply and trajectory	<p>A number of comments were raised on the soundness of the housing supply included in the Plan, including:</p> <ul style="list-style-type: none"> • Suggestion that SLAA sites may be double counted as windfall sites. • Seem to be some mistakes or inconsistencies in the delivery rates presented for small sites and larger scale flatted development. • Delivery of HA2 is unlikely to commence until year 11 and realistic delivery on HA2 and at Princess Royal Barracks (Mindenhurst) is more likely to be around 70dpa. • All sources of supply should be formally allocated in order to be relied upon. Further public engagement should be undertaken to support their inclusion and to comply with legal obligations. • Reliance on large scale brownfield sites exposed to delays in delivery, suggesting Land East of Knoll Road (LEKR) and London Road Block (LRB) 	<p>Knowles Property Group (55796353); Lavignac Securities (55781537); Persimmon Homes Thames Valley (39477697)</p>	<p>The Local Plan identifies sufficient supply to meet the Local Plan housing requirement.</p> <p>The Council considers that the housing supply and trajectory is robustly calculated and evidenced. To avoid double counting, a windfall contribution is not included in years one and two of the SLAA 2023.</p> <p>There is evidence to support that the housing trajectory for delivery of Princess Royal Barracks (Mindenhurst) is realistic, noting the recent approval of the majority of remaining reserved matter applications for the site.</p> <p>The Local Plan allocates all non-permitted housing sites for 10 or more net units identified in the SLAA 2023. It is not considered necessary to allocate sites below this 10 home threshold. London Road Block and Land East of Knoll Road are Council owned and promoted sites, and the Council is confident in the evidenced delivery</p>



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	<p>are too optimistic. Suggest more detailed information is required on site delivery, noting little detail on site delivery for town centre allocations. Inclusion in housing trajectory therefore difficult to support.</p>		<p>trajectory. Further information is set out in the Housing Supply Topic Paper 2024. Further information on town centre site delivery is set out in the response below.</p>
<p>Town Centre Regeneration and delivery</p>	<p>Support town centre regeneration, but raises concerns on delivery, including:</p> <ul style="list-style-type: none"> • Optimistic on when town centre sites will be delivered, citing phasing and limited progress on sites. • More detail needed on the mix of homes for strategic town centre sites that will be in the five year housing land supply on adoption. • Raises concerns on the uniform phasing of other sites in the supply, on the basis they are likely to be delivered in a shorter time period. • Over reliance on town centre regeneration to meet the Borough's needs. From 2023/24 this accounts for 26% of total projected supply but 	<p>Home Builders Federation (20211169); Somerston Development Projects (39484257)</p>	<p>The support for town centre regeneration is welcomed. London Road Block (LRB) and East of Knoll Road (LEKR) are Council owned and promoted sites, and the Council is confident in the evidenced supply and delivery trajectory. The site allocations are informed by masterplanning and viability work, with further information set out in the Housing Supply Topic Paper 2024.</p> <p>Recently, in September 2024, the Council received grant funding from Homes England for enabling works to support delivery of the London Road Block site via a Brownfield Land Release Fund Grant for demolitions. Topographical and ground condition surveys were completed on Land East of Knoll Road in December 2024. The Council is in discussion with delivery partners and with Homes</p>



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	<p>there are no planning permissions, Civic and business uses require relocation, no delivery partner is identified and the land allocated has been in the “pipeline” for development for many years.</p>		<p>England.</p> <p>The corporate commitment to the delivery of town centre regeneration is also evidenced by the Camberley Town Centre Strategic Vision to 2034, published in November 2024, with the work on both sites being led by a Regeneration Working Group, chaired by the Leader of the Council.</p>
<p>Housing requirement and draft NPPF 2024 consultation</p>	<p>In relation to the NPPF consultation published in July 2024, a number of respondents suggested that the Plan was not legally compliant or sound because it is not positively prepared, not justified and not consistent with national policy. Respondent’s comments relating to this this included:</p> <ul style="list-style-type: none"> Generates significant increase in the Borough’s housing requirement, with some suggesting a 106% increase and an additional need for between 4000 and 6000 homes over the Plan period. Some suggest that the consultation proposed new requirement necessitates a new spatial strategy and 	<p>Chilton Frimley Ltd (55686561); Kingsbury Investment and Development Group (55784929); Knowles Property Group (55796353); Lavignac</p>	<p>The Local Plan is Submitted in accordance with the current NPPF (2023). Subject to the publication date of the new NPPF the Local Plan will alternatively be Submitted in line with the proposed transitional arrangements set out in the consultation document, which allows for any Plan submitted for examination prior to publication of the NPPF plus one month, to be examined under the NPPF 2023.</p> <p>The Council notes that the NPPF consultation proposals set out a need for the Council to start an immediate Local Plan review at the earliest opportunity as a result of the more than 200</p>



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	<p>updated evidence base, noting the difference is in excess of the 200pa difference between the current and proposed methodologies set out in the proposed transitional arrangements.</p> <ul style="list-style-type: none"> Plan would not meet half of the required needs or genuinely meet local needs, entrenching chronic affordability issues. A new NPPF anticipated before the Plan is submitted and therefore it should be examined under new guidance and would be found unsound. Progressing the Plan in advance of the new NPPF does not constitute “proper planning” due to failing to cooperate with neighbouring authorities and secure policies to meet local needs. Concern if SSI now adequately provides for needs, without an immediate review the Council will be at risk of appeal challenges. A number 	<p>Securities (55781537); Persimmon Homes Thames Valley (39477697); Philip Marsden (55785057); Redrow Homes Southern Counties (50298177); Retirement Villages Group (55658945); Rumsby Investments Ltd (55796385); SCWW3 Limited</p>	<p>dwelling difference between the current and proposed methodologies and is happy to reflect this requirement subject to discussions at the Examination.</p> <p>To avoid a Local Plan policy vacuum and in view of the age of the current adopted Local Plan (2012) the Council considers it is imperative to progress the Local Plan to Submission and onto adoption. Adoption of the Submission Local Plan will deliver a range of other benefits for the community of Surrey Heath.</p>



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	<p>of respondents identified that the Council will be required to undertake an immediate review and a review policy or wording should be included in the Plan, setting out clear timescales for review and completion, and consequences of not meeting timescales. Example of the Bedford Plan cited.</p> <ul style="list-style-type: none"> Local Plan or SA should address NPPF changes for compliance, justifying alternative approach to housing need. <p>One respondent considered the Plan largely sound, but requests that the Pre-Submission Local Plan is reviewed and revised following the current consultation and publication of the new NPPF.</p>	<p>(55659233); Thakeham Homes (20198241); Knowles Property Group (55796353); Somerton Development Projects (39484257); Home Builders Federation (20211169); UCB (39605953)</p>	
<p>Housing requirement and draft NPPF 2024 consultation – Release of Green</p>	<p>A number of comments were received regarding the draft NPPF and its implications for Green Belt release to meet the housing requirement, including:</p>	<p>Persimmon Homes (39477697); Kingsbury Investment</p>	<p>The Local Plan is Submitted in accordance with the current NPPF (2023). Subject to the publication date of the new NPPF the Local Plan will alternatively or also be Submitted in line with the proposed transitional arrangements set out in the</p>



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Belt sites	<ul style="list-style-type: none"> • The Council’s failure to address the proposed changes to the NPPF in relation to the Green Belt is “foolhardy at best”. • Policy pays insufficient regard to emerging policy as set out in the Draft NPPF and should review Green Belt in light of Grey Belt, which would ease pressure on the west of the Borough and improve affordable housing provision. • The Council has a moral obligation to consider higher growth options in light of the NPPF consultation and should be actively reviewing its Green Belt approach in light of the direction of travel on Grey Belt. • By the point of Examination there will be significant discord between Plan-led supply and housing requirements and that there will be a very strong set of exceptional circumstances to 	and Development Group (55784929); Somerston Development Projects (39484257)	consultation document which is for publication of the NPPF plus one month for Submission and Examination under NPPF 2023. Accordingly, the Plan is prepared in line with the policy imperatives of the NPPF 2023 and the points raised in representations are not consistent with the Council’s approach of progressing in line with the proposed transitional arrangements.



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
	release more land to meet those requirements.		
Supply buffer	Consider a 7% buffer to be relatively minor and likely minimum, given reliance placed on achieving the build-out rates currently afforded to Princess Royal Barracks.	Redrow Homes Southern Counties (50298177)	There is no requirement for Local Plans to demonstrate a housing supply buffer over the housing requirement. It is noted that the Plan is frontloaded, providing greater certainty for delivery.
Spatial Strategy	<p>Not convinced the draft Spatial Strategy is a robust one and suggestions that there are clear omissions and deficiencies with the spatial strategy. Reasons set out include:</p> <ul style="list-style-type: none"> • The constraints of the Borough need to be viewed in the context of the exceptional need that housing presents, and the authority should be looking to proactively address this. • Over reliance on brownfield, flatted development which conflicts with lack of provision for family housing in the Western Urban Area and is confounded by lower affordable housing requirements in the town 	Persimmon Homes Thames Valley (39477697); Somerston Development Projects (39484257)	<p>The housing requirement is evidenced through the Local Housing Need Assessment (2024) and reflects the current standard methodology. The housing supply comprises a range and mix of homes, including family homes and delivery of this mix is supported by Policy H5.</p> <p>Release of Green Belt sites around settlements was considered through the Interim Sustainability Appraisal 2022, which supported the Regulation 18 Draft Local Plan: Preferred Options document, however this found the approach to perform relatively poorly in terms of all sustainability topics and was not therefore considered to represent a preferred spatial strategy.</p> <p>The Council is confident in the evidenced delivery</p>



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
	<p>centre. Suggests the Council has just sought to provide overall housing needs, not different needs, including affordable housing.</p> <ul style="list-style-type: none"> • Critical misstep not to consider sites adjoining higher order settlements, including Green Belt land. • Reliance on large scale brownfield sites exposed to delays in delivery. 		trajectory for large brownfield sites, as set out in the Housing Supply Topic Paper.
Spatial distribution of supply	<p>East of the Borough future housing needs overlooked with 13% of supply. Comments raised that only 17 dwellings identified in Bisley, which will result in population stagnation and be detrimental to vitality of the village, failing to address Paragraph 79 of the NPPF.</p> <p>Disagreement with the spatial strategy directing development to the west of the Borough.</p>	Thakeham Homes (20198241); Vistry Group (55796577)	The Spatial Strategy is focused on the redevelopment of previously developed land in the western part of the Borough which is best placed to support delivery of an enhanced Camberley Town Centre and directs development within the most demonstrably sustainable part of the Borough.
Green Belt	Note that housing needs can be met from sources other than the Green Belt and that	The Royal Borough of	Noted.



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
	no exceptional circumstances exist for Green Belt release but notes that the Exceptional Circumstances Topic Paper proposes three Green Belt amendments. Amendments do not seem to have a detrimental impact on the Strategic Area Green Belt buffer between the two Boroughs.	Windsor and Maidenhead (19304673)	
Removal of Chobham from Green Belt – Support with amendment	Principle of insetting Chobham within the Green Belt is supported, however conclusions in the Chobham Green Belt Boundaries Study are contested. Built components at Broadford should be included in the settlement boundary and the remainder of Broadford be found suitable for allocation for residential uses.	Philip Marsden (55785057)	Support noted. The methodology set out in the Chobham Village Green Belt Boundaries Study is considered to be robust and has resulted in the definition of an appropriate settlement/Green Belt boundary for Chobham. To the south of the settlement, the boundary is appropriately defined by the River Bourne as a clear, permanent physical feature.
Removal of Chobham from Green Belt - Object	Removal of Chobham from the Green Belt is not legally compliant or sound. Exceptional circumstances have not been fully evidenced and justified and opportunities posed by the proposed new NPPF should be considered. Retention of the designation for Chobham	Chobham Parish Council (19899073)	Exceptional circumstances for the removal of Chobham from the Green Belt are evidenced and justified in detail in the Green Belt Exceptional Circumstances Topic Paper. Retention of the settlement within the Green Belt would be inconsistent with Paragraph 149 of the NPPF 2023.



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
	would make the plan legally compliant and sound.		
Removal of Chobham from Green Belt - Process	Removal of Chobham from the Green Belt is not legally compliant or sound. The process did not take account of guidance contained in the SCI and relevant Topic Papers were not available for much of the consultation, raising questions regarding the transparency of the proposals.	Chobham Parish Council (19899073)	The approach taken to the inseting of Chobham in the Local Plan is consistent with the SCI. Comments were sought on proposals at Regulation 18 stage and consultation responses informed further amendments to proposed boundaries. Topic Papers are not statutory documents.
Removal of Longcross from Green Belt – support with amendment	<p>Comments of support (with amendments to the Plan) were received in respect of the removal of Longcross from the Green Belt, including:</p> <ul style="list-style-type: none"> • The removal of Longcross from the Green Belt is sound; however, the Plan needs to reference Green Belt release for all relevant areas within the Policy text. • Land in the southwest corner should also be removed. Request for all land to east of Burma Road to be removed from Green Belt. 	The Longcross Partnership (39704705); Netflix Studios UK Ltd (39536289)	Support noted. It is agreed that further clarification in respect of the removal of land from the Green Belt would be beneficial and a new Paragraph of supporting text under Paragraph 2.28 is proposed for consideration by the Local Plan Inspector. All land to the east of Burma Road is proposed to be removed from the Green Belt. As such no further amendments are necessary.



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
Green Belt - Evidence	<p>A number of representations received in respect of SSI raised concerns in respect of the Green Belt Review, including:</p> <ul style="list-style-type: none"> The Council's Green Belt Review has not robustly explored all options. Raise questions about whether the assessment was robust and consistent. Failing to assess available Green Belt sites is contrary to Government guidance. 	<p>Persimmon Thames Valley (39477697); Rumsby Investments Ltd (55796385); Knowles Property Group (55796353)</p>	<p>The Council considers that the approach taken to Green Belt Review is robust and aligned with Government guidance, enabling a consistent approach to be taken in the assessment of land parcels assessed within the study.</p>
Level of development planned for Windlesham	<p>In relation to the level of development in Windlesham, the following points were raised:</p> <ul style="list-style-type: none"> Level of proposed development extremely unfair for a small village. Questions why further allocations are included for the area, providing detailed comments on committed supply and infrastructure implications. Suggests that the plan is not positively prepared because the level of 	<p>Tony Murphy (19285441); Windlesham Heathpark Wood Group (19294977)</p>	<p>The Spatial Strategy is focused on the redevelopment of previously developed land in the west of the Borough, directing development to the most demonstrably sustainable areas of the Borough. However, a small proportion of housing supply is identified in the east of the Borough, including Windlesham.</p>



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
	development proposed for Windlesham places a further burden on the village and does not take account of the level of development already committed to the area. Suggests Surrey Heath has failed commitments in concentrating development in west of the Borough.		
Lapse rate	Suggest a 10% lapse rate needs to be included.	Vistry Group (55796577)	Local evidence is used to calculate lapse rate, which is considered more robust than relying on national averages.
Strategic committed sites	The Regulation 18 Plan allocated strategic commitments, but these are omitted in the Regulation 19 Plan. Insufficient policy support for strategic commitments poses significant issues for soundness in relation to uncertainty on housing delivery and the ability to meet LHN. Provides detailed options to address this in the Plan, including policy support for permissions of 50 or more units.	Homes England (19285729)	Noted, the Council agrees that for sites of 50 or more dwellings that benefit from planning permission but have not commenced, it would be helpful to support the principle of development in the Plan. A Main Modification is proposed to the supporting text to Policy HAI for consideration by the Local Plan Inspector.
Employment land	The Plan is not positively prepared because	ADP Fairoaks	The Employment Land Technical Paper (2023) and



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
supply	the spatial strategy under-provides land for employment uses. There is an over reliance on re-development of existing employment uses within established employment site boundaries. Fair Oaks Airport is a missed opportunity (for employment) in the east of the Borough, as the site is not subject to significant environmental constraints, other than Green Belt, which is capable of reinterpretation.	Ltd (55800481)	the Employment Support Assessment (2023) sets out that the Plan supports employment uses, taking account of needs and opportunities. Furthermore, the Borough is constrained by the Green Belt and the Green Belt Exceptional Circumstances Topic Paper (2024) sets out that there are not considered to be exceptional circumstances that warrant the release of land to meet employment needs. As such, the proposed spatial strategy is appropriate in relation to the context of the Borough.
Public transport accessibility	Rail network in the Borough is relatively limited in comparison with rest of Surrey, and employment sites are clustered around the strategic road network, which favours car use. Important opportunities relevant to the Spatial Strategy are identified for improving accessibility by public transport. These focus on:	Network Rail (55788833)	Transport context noted. Camberley Town Centre lies within the Blackwater Valley Bus Priority Programme Area, in the Surrey Bus Service Improvement Plan 2024, which is led by Surrey County Council as the Transport Authority. The Council will engage with the Transport Authority and rail stakeholders in ongoing town centre regeneration planning. Surrey Heath Local Cycling and Walking



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary response
	<ul style="list-style-type: none"> • Camberley Town Centre – station upgrades as part of town centre regeneration and linked to service improvements, • Deepcut - improving active travel opportunities • Employment sites – improve access via dedicated bus routes to stations <p>Joint working with neighbouring authorities is necessary, particularly in relation to Farnborough Station which is outside the Borough.</p>		Infrastructure Plan sets out priorities for supporting active travel, with improvements to/from Deepcut in phase 2.
Cycle route infrastructure	The Plan is unsound because the spatial strategy emphasises development in the west of the Borough, yet there is a lack of evidence to address the current insufficient provision of safe and connected cycle routes to and from Camberley Town Centre.	William Parke (55050337)	Surrey Heath Local Cycling and Walking Infrastructure Plan sets out a strategy for improving walking and cycling infrastructure in the Borough, with routes to and from Camberley prioritised in the first phase of the infrastructure plan.



Table 4: Policy SS2: Spatial Strategy

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 5: SS3a/b Climate Change Mitigation and Adaptation

Topic	Main Issue	Respondent (ID Number)	SHBC response summary
Viability	<p>Considers the Policy is unsound due to viability concerns, including:</p> <ul style="list-style-type: none"> Policy should clarify any off-site measures for climate change mitigation, including financial payments, should be subject to viability considerations. Full viability implications unclear and not been demonstrated for net zero requirements set out in criterion SS3a I(a). 	<p>Churchill Living and McCarthy Stone (55791649); Persimmon Homes Thames Valley (39477697)</p>	<p>A Main Modification is proposed for consideration by the Local Plan Inspector for the supporting text to Policy DH8 to reference the Surrey Viability Toolkit. This provides detailed guidance on the delivery of low/zero carbon development. Whilst the Policy does identify viability as a key consideration, the supporting text is clear that the Council will not permit development if it would compromise the Council's ability to meet its duties under Section 19(1A) Planning and Compulsory Purchase Act 2004.</p>
National policy and building regulations	<p>Policy SS3a/b is unsound because it should be better aligned with building regulations and national policy. Approach to net zero needs to be gradual and the Policy should account for the fact that technology is needed to catch up with the more aspirational element of the wider agenda.</p>	<p>Persimmon Homes Thames Valley (39477697); Bloor Homes (55790785)</p>	<p>There is no restriction on Local Plans going beyond national requirements relating to low/zero carbon design. The Local Plan is supported by the Surrey Heath Climate Change Study (2020) explores how climate change objectives might most effectively be addressed through the Local Plan.</p>
Support	<p>Welcomes and supports the Policy, noting:</p>	<p>NHS Property Services Ltd</p>	<p>Noted.</p>



Topic	Main Issue	Respondent (ID Number)	SHBC response summary
	<ul style="list-style-type: none"> Fully support policies that promote carbon neutral development and highlights that NHS property could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met. Welcomes Policy in helping to deliver action on climate change, reduction in Surrey Heaths carbon emissions and supporting the transition to net zero. Particular support for net zero requirements for major applications. 	(55790337); The Royal Borough of Windsor and Maidenhead (19304673)	
Support	Welcomes Health Impact Assessment (HIA) requirement. One respondent suggests additional text and links within supporting text relating to Surrey County Council publications on health in planning.	Surrey County Council (19304577); NHS Property Services Ltd (55790337)	Noted. The Council agrees that to support delivery of the Policy, additional text and links on health in planning should be added. A new Paragraph of supporting text is proposed as a Main Modification for consideration by the Local Plan Inspector.



Table 6: Policy HAI Site Allocations

Topic	Main Issue	Respondent (ID Number)	SHBC summary response
General support	Support principle due to no expectation to build on Chobham Common or area surrounding Fair Oaks.	Karen Sinclair-Williams (39257857)	Noted.
Direction of travel in national policy	Draft NPPF 2024 and accompanying Written Ministerial Statement are material considerations, which will require the delivery of additional housing and commercial development in Surrey Heath.	Bell Cornwell LLP (55791105)	The Local Plan is Submitted in accordance with the current NPPF (2023). Subject to the publication date of the new NPPF the Local Plan will alternatively be Submitted in line with the proposed transitional arrangements set out in the consultation document, which allows for any Plan submitted for examination prior to publication of the NPPF plus one month, to be examined under the NPPF 2023.
Site selection methodology	Points raised in respect of site selection: <ul style="list-style-type: none"> Recommend delaying Plan to reconsider site selection methodology, SLAA appears not to have taken account of latest availability information for Pine Ridge. 	Chilton Frimley Ltd (55686561); Knowles Property Group	The SLAA 2023 was based on the latest confirmed site availability information available at the time of publication, which informed the housing allocations in the Plan. The Local Plan is Submitted in accordance with the



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	<ul style="list-style-type: none"> • Not positively prepared or effective because it fails to allocate land south of Fenns Lane. • Not effective due to no assessment of feasibility or site deliverability of Green Belt sites with PDL status and the proposed site allocations are not proven to be deliverable or sufficient in capacity. • In the event that a grey belt policy is adopted relating to draft NPPF 2024, evidence base underpinning housing allocations would be fundamentally flawed. • Concern if the deliverability of some allocated sites not appropriately evidenced or justified. 	(55796353); Rumsby Investments Ltd (55796385); Kingsbury Investment and Development Group (55784929); Lavignac Securities (55781537)	current NPPF (2023) (see above response), therefore not considered appropriate or necessary to amend housing requirement. Insufficient commitment was provided by the site owner to demonstrate that the Pine Ridge site (SLAA ID: 830) could be considered deliverable and the site was therefore discounted in the SLAA 2023. The Council considers that the housing supply and housing allocations are robustly evidenced. The Council has concluded that exceptional circumstances do not exist for Green Belt release to meet housing needs for the reasons set out within the Green Belt Exceptional Circumstances Topic Paper (2024). The approach taken is in alignment with the NPPF 2023.
Densities	Suggests the need to specify maximum densities, due to garden space and parking provision. Asks how this fits with plan to provide green environment.	David Natolie (19723553)	The Council does not consider it appropriate to set maximum densities, which would conflict the NPPF requirements to optimise the use of land to meet identified housing needs. The Plan should be read as a whole and other policies set out detailed



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
			requirements for environmental protection and enhancement.
Reliance on Town Centre sites	Policy unsound and unjustified on the basis that there is concern about over reliance on allocations within Camberley Town Centre, which is unlikely to meet needs relating to accommodation type.	Persimmon Homes Thames Valley (39477697)	Across the Borough as a whole a range of home sizes, types and tenures will be delivered through the Local Plan.
Approach to 10 – 24 dwelling allocations	Recommends allocations for 10 to 24 units expressed more clearly in policy terms, suggesting detailed amendments to provide flexibility for constraints to be accommodated.	Pond Family (55796193)	Sites of 10-24 units are allocated to determine the principle of development, but have no specific policy requirements. Any proposals would have to be compliant with other policies in the Plan.
Specialist housing	Local Plan not positively prepared, justified or consistent with national policy due to small number of allocations (124 units) for specialist housing not meeting the need for extra and residential care, relating to an aging population and identified needs.	Retirement Villages Group (55658945)	The Local Plan supports the delivery of specialist housing which can be delivered on any sites allocated for housing development.
Planning history	Suggests that the Council has a history of refusing applications on emerging allocations, concern Paragraph 3.6 and HAI will be used by the Council to refuse housing on sites	SCWW3 Limited (55659233)	The Council consider it appropriate to outline the status of housing allocations and provide clarification that further detailed evidence will need



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	needed to meet housing needs.		to be considered at the planning application stage.
Highway implications	No allocations directly adjacent to the Strategic Road Network (SRN). Should unallocated development come forward adjacent to SRN, this will require early engagement with National Highways.	National Highways (55788545)	Noted.
HAI/03 support	Supports allocation, noting benefits of the proposed scheme.	Network Rail (55788833)	Noted.
HAI/05	Support reference to providing appropriate linkages to proximal station, but the Policy unsound due to no requirement for the development to fund improved facilities at Frimley Station. Proposes addition of requirement for financial contribution to improve facilities at Frimley Station.	Network Rail (55788833)	This site now benefits from planning permission for 170 dwellings (reference SU/24/0116). In view of the stage that this site has reached it is not considered appropriate to include an additional criterion.
HAI/05	The scale of development for Sir William Siemens Square is likely to require wastewater network upgrades and early liaison with Thames Water is recommended.	Thames Water (41965281)	This site now benefits from planning permission for 170 dwellings (reference SU/24/0116). In view of the stage that this site has reached it is not considered appropriate to include an additional criterion.
HAI/05	The Policy is unsound; Policy HAI/05 should	Runnymede	This site now benefits from planning permission for



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	be modified to include a minimum number of Gypsy and Traveller Travelling Showpeople pitches/plots that can be accommodated on the site, given the large unmet need for this accommodation. RBC has extremely high needs for pitches/plots and is unable to take any unmet needs from adjoining areas so wants to make sure Surrey Heath does all it can to meet its own needs. The Inspector will need to decide if this unmet need goes to the heart of the soundness of the Plan.	Borough Council (55636929)	170 dwellings (reference SU/24/0116). In view of the stage that this site has reached it is not considered appropriate to include an additional criterion relating to pitches/plots. As set out in the agreed Statement of Common Ground with Runnymede Borough Council, the Council has undertaken extensive work to seek to meet identified needs, including engagement under the duty to cooperate, and has developed a more flexible policy approach to determine future planning applications.
HAI/06 support	Support allocation of the Chobham Rugby Club, noting progress on bringing forward the site. Suggests additional flexibility by amending allocation to approximately 90 dwellings.	Chobham Rugby Football Club Limited (40368321)	Noted, the Council considers that sufficient flexibility is provided at Paragraph 3.6 of the Submission Plan.
HAI/06	Chobham Rugby Club - known significant fluvial flood risk issues to the south which could be exacerbated by development, also surface water issues in this area to be considered at design stage to avoid impacts to adjacent sites. Proposes additional detailed	Environment Agency (19283937)	Agree that it would be helpful to include an additional criterion requiring the development proposal to assess the risk of flooding and mitigate against the impact of flood risk. A new Policy criterion is proposed as a Main Modification for consideration by the Local Plan Inspector.



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	site-specific requirements.		
HAI/08 support	Supports allocation, noting benefits of site and that policy requirements can be met. Suggests the allocation should be in the first phase of development to meet housing needs and affordable housing goals.	Murphy Family (55948193)	Noted. Due to the need to address site constraints, considered appropriate to phase towards the end of the Plan period. This does not prevent the site coming forward earlier.
HAI/08	Essential to require developers to engage with Network Rail due to proximity to railway. Proposed additional requirement to ensure sufficient safeguards are agreed with Network Rail to protect the railway from impacts of the development.	Network Rail (55788833)	The Council considers that criterion c of the allocation already addresses this point. It is not considered necessary to specifically require engagement with Network Rail as part of the allocation criteria.
HAI/10	192-210 London Road. Issues with surface water flooding in this area need to be considered at design stage to avoid impacting adjacent sites. The site does not have specific requirements, but due to constraints would expect a requirement for to consider risk of surface water flooding.	Environment Agency (19283937)	Sites of 10-24 units are allocated to determine the principle of development but have no site-specific requirements. Any proposals would have to be compliant with other policies in the Plan, including Policies E6 and E7.
HAI/11	The Deans - note no specific policy requirements due to size but would expect this due to significant fluvial flood issues	Environment Agency	Sites of 10-24 units are allocated to determine the principle of development but have no site-specific policy requirements. Any proposals would have to



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	identified across the site and locality. Proposes detailed site-specific requirements.	(19283937)	be compliant with other policies in the Plan, including E6 and E7.
HAI/17	Agree with allocation, but evidence indicates the site can accommodate 55 dwellings with limited Green Belt harm.	Philip Marsden (55785057)	The site capacity is based on the existing massing of the site, as set out in the SLAA 2023 assessment.
HAI/17	Broadford - note no specific requirements due to size but would expect this due to significant fluvial flood issues identified in the area which could be exacerbated by development. Proposes detailed site-specific requirements.	Environment Agency (19283937)	Sites of 10-24 units are allocated to determine the principle of development but have no site-specific policy requirements. Any proposals would have to be compliant with other policies in the Plan, including Policies E6 and E7.
HAI/18	Concerns on the deliverability of HAI/18 due to part of site area being within the SPA 400m buffer. Recommend revisiting to not encroach on the 400m buffer.	Natural England (42033025)	Site capacity takes account of the excluded site areas inside the 400m buffer zone, which is treated as an absolute constraint in the supporting SLAA 2023 evidence base. In addition, forthcoming proposals would need to comply with the Thames Basin Heaths Special Protection Area Policy EI.
HAI/22 support	Support allocations, specifically noting allocation of HAI/22 that is considered deliverable at the proposed scale.	Pond Family (55796193)	Noted.
HAI/22	Sherrard Way - note no specific	Environment	Sites of 10-24 units are allocated to determine the



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	requirements due to size but would expect this due to the site being a historic landfill, bedrock and superficial secondary A aquifers and proximity to Blackwater River. Proposes detailed site-specific requirements.	Agency (19283937)	principle of development but have no site-specific requirements. Any proposals would have to be compliant with other policies in the Plan, including Policies E6 and E7.
HAI/23	Supports allocation but notes that the allocation should be for 14 net dwellings.	SCWW3 Limited (55659233)	Agree that the allocation should be amended to 14 dwellings and a Main Modification is proposed for consideration by the Local Plan Inspector accordingly.
HAI/27 support	Welcome and support allocation for specialist older persons housing and supporting Topic Paper. Not necessarily in agreement with the need identified in the LHNA, but notes a significant demand remains over the Plan period.	SageHaus Living (55783745)	Noted.
Omission sites	The following omission sites were submitted as proposed additions to HAI with accompanying evidence: <ul style="list-style-type: none"> Meadow Farm, Kennel Lane (SLAA ID 1004) – additional housing and commercial/employment space. 	Bell Cornwell LLP (55791105); Chilton Frimley Ltd (55686561); Kingsbury	Noted. The sites listed are not identified as allocations in the Submission Local Plan.



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	<ul style="list-style-type: none"> • Pine Ridge Golf Course, Old Bisley Road (SLAA ID 830) – suitable and available for housing development. • Castle Grove Nursery, Scotts Grove Road – for up to 40 dwellings. • Land South of Fenns Lane (SLAA ID 153) – for circa 99 dwellings. • Land South of Broadley Green (SLAA ID 915) – for approximately 50 dwellings. • Land East of Snows Ride (SLAA ID 809) – 154 specialist homes and bespoke SANG. • Land East of Snows Ride (SLAA ID 276) – up to 100 dwellings. • Land at Clews Lane (SLAA ID 740) and Land South of Church Lane, Bisley (SLAA ID 903), put forward as one site for net zero residential development. • Fairoaks Airport (SLAA ID 890) – for 1600 homes, employment space, 	<p>Investment and Development Group (55784929);</p> <p>Knowles Property Group (55796353);</p> <p>Lavignac Securities (55781537);</p> <p>Retirement Villages Group (55658945);</p> <p>Rumsby Investments Ltd (55796385);</p> <p>Thakeham Homes (20198241);</p>	



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	SANG and 12 Gypsy and Traveller pitches.	Vistry Group (55796577)	



Table 7: Policy HA2 London Road Block

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Support	In favour of Camberley development, particularly London Road Block.	David Chesneau (19291009)	Noted.
Deliverability	Consider the Policy is unsound. Question the likely delivery of affordable housing and suggest that based on similar Surrey town centre schemes delivery is likely to be further reduced. Note the suitability and opportunity that promoting Fair Oaks as a site allocation within the Local Plan offers for affordable housing delivery.	Vistry Group (55796577)	The Council has undertaken viability assessments for the whole plan and for London Road Block. This has informed the policy requirements. Fair Oaks is not identified as an allocation in the Submission Local Plan.
Deliverability	Consider the Policy is unsound. Question the deliverability of the site with issues raised including: <ul style="list-style-type: none"> Quantum of new homes exceeds capacity and urban design. Lack of feasibility and design work and concept masterplanning required. Lack of commercial viability. Query a strategic SANG solution. 	Persimmon Homes Thames Valley (39477697)	The Council has undertaken viability assessments for the whole plan and for London Road Block and high-level feasibility and concept planning for the site as set out in the Housing Topic Paper (2024). There is sufficient SANG capacity to meet the housing requirement over the plan period as set out in the Thames Basin Heaths Special Protection Area Topic Paper (2024).



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Infrastructure - wastewater network	The scale of development is likely to require upgrades to the wastewater network and early liaison with Thames Water is recommended.	Thames Water (41965281)	As set out in the agreed Statement of Common Ground Update with Thames Water, the Council would support the inclusion of an additional criterion in Policy HA2 regarding the need for wastewater network upgrades at this site and a Main Modification is proposed for consideration by the Local Plan Inspector.



Table 8: Policy HA3 Land East of Knoll Road

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Deliverability	Consider the Policy is unsound. Question the likely delivery of affordable housing and suggest that based on similar Surrey town centre schemes delivery is likely to be further reduced. Note the suitability and opportunity that promoting Fair Oaks as a site allocation within the Local Plan offers for delivering affordable housing.	Vistry Group (55796577)	The Council has undertaken viability assessments for the whole plan and for Land East of Knoll Road. This has informed the policy requirements. Fair Oaks is not identified as an allocation in the Submission Local Plan.
Deliverability	Consider the Policy is unsound. Question the deliverability of the site with issues raised including: <ul style="list-style-type: none"> Quantum of new homes that is considered achievable. The delivery of flatted development. Timing for delivery and lack of a SANG solution. Lack of feasibility and masterplanning work. 	Persimmon Homes Thames Valley (39477697)	The Council has undertaken viability assessments for the whole plan and for Land East of Knoll Road and high-level feasibility and concept planning for the site as set out in the Housing Topic Paper (2024). There is sufficient SANG capacity to meet the housing requirement over the plan period as set out in the Thames Basin Heaths Special Protection Area Topic Paper (2024).
Infrastructure –	The scale of development is likely to require	Thames Water	As set out in the agreed Statement of Common



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
wastewater network	upgrades to the wastewater network and early liaison with Thames Water is recommended.	(41965281)	Ground Update with Thames Water, the Council would support the inclusion of an additional criterion regarding the need for wastewater network upgrades at this site in Policy HA3 and a Main Modification is proposed for consideration by the Local Plan Inspector.
Infrastructure – Camberley Station	Supports improved pedestrian and cycle links to Camberley Station but considers the Policy is unsound as it should include the need for contributions towards Camberley Station improvements with suggested additional wording provided for criterion k.	Network Rail (55788833)	This requirement would be covered by Policy IN1: Infrastructure Delivery, IN2 (2): Transportation, and Policy CTC3: Movement and Accessibility particularly criterion 2c should there be specific, costed improvement schemes that would justify the need for contributions. Bids could also be made for funding from CIL.



Table 9: Policy HA4 Mindenhurst

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Allotments	Provision of allotments at Mindenhurst is documented elsewhere but nowhere in the document is there reference to additional allotment space. Given projected population increases across the Borough, should this be part of the environmental plan and greening policy?	David Natolie (19723553)	The provision of additional allotments in association with new development would be considered against Policy IN5: Green Infrastructure.
Basingstoke Canal	Note that the Basingstoke Canal SSSI is referenced in supporting text to Policy E7 Watercourses and due to its proximity to the site should also be referenced in Policy HA4.	Environment Agency (19283937)	Noted but the Council considers that other policies and references in the Plan adequately address this.
Stage of development	The site allocation as drafted does not reflect the stage of development or requirements of the planning permission or SI06. Suggest that the Policy be altered to take account of the various phases of development that have been delivered or permission secured.	Bloor Homes (55790785); Vistry (55796577)	Whilst it is recognised that this site is under construction with a number of completions, the Council considers that this site allocation should apply to the whole of the Mindenhurst site. Completions and permissions are accounted for in the housing supply calculations and in housing monitoring including the Five-Year Housing Land Supply.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
General	Support the framing of the site allocation policy and criterion HA4 2(b). Notes that design codes do not apply to many of the phases.	Bloor Homes (55790785)	Support noted.
General	Support the ongoing development at Mindenhurst but capacity should not be treated as high as 1,200 dwellings as a significant proportion is already delivered. Notes that if the plan period is extended this could require significant alterations to this Policy.	Vistry (55796577)	Support noted. As set out above, it is considered that the site allocation should apply to the whole of the site and reference the total capacity. The Council is not proposing amendments to the plan period which is covered in response to representations under Policy SSI Spatial Strategy.



Table 10: Policy H5 Range & Mix of Housing

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Merged self build	<p>Self build policy requirements should be amended or deleted for the following reasons:</p> <ul style="list-style-type: none"> • 5% requirement not justified by LHNA 2024 and Self Build Register evidence. • The 5% requirement would result in a significant oversupply and would be to the detriment of delivery of other needed housing types. If retained, unsound and unreasonable to offer unsold plots to the Council or Registered Providers first because it is not affordable housing. • Marketing period should be reduced to 6 months. • Concern regarding the suitability of flatted development and new housing developments for providing self-build plots. 	<p>Home Builders Federation (20211169); Persimmon Homes (39477697); Thakeham Homes (20198241)</p>	<p>The number of active registrants on Part I has increased, and the LPA must have regard to both parts of the register in all plan-making activities. A 12-month marketing period is considered proportional.</p> <p>It is agreed that unsold plots should not be offered to the Council or Registered Providers and a Main Modification to delete this requirement is proposed for consideration by the Local Plan Inspector.</p> <p>As evidenced by various examples, such as Goldcrest's 40 Atheldene Road, London, completely flatted schemes can deliver custom-build homes in the form of shell homes.</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	<ul style="list-style-type: none"> Suggestion that a site-specific approach to allocate self-build plots or windfall approach would be better suited. 		
Support	Broadly supportive of the overall Policy approach, with the exception of self-build requirements.	Persimmon Homes (39477697); Thakeham Homes (20198241)	Noted.
Accessible housing	Broadly supportive of Policy. However, it is unclear that the M4(3) adaptable/accessible requirement for open market homes is justified. If retained, an additional clause should be added for marketing provisions for reversion to conventional open market housing typologies if there is a lack of demand to remove onerous restrictions.	Bloor Homes (55790785)	<p>The LHNA (2024) demonstrates an increase in need for adaptable and accessible homes up to 2040 for both market and affordable homes. This includes projected population growth in the elderly population, growth in the number of people with mobility problems and a need for wheelchair user accommodation.</p> <p>In compliance with Paragraph 60 of the NPPF, and Paragraph 007 (ID 56-007-20150327) of National Planning Practice Guidance, a range and mix of homes, including those built to adaptable and</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
			accessible standards in line with evidenced local needs, will future-proof the housing stock for residents and ensure increasing needs are met.
Accessible housing	The requirement to provide a percentage of older persons housing as M4(3) is not demonstrated to be viable and the Policy should be amended to reflect this.	Churchill Living and McCarthy Stone (55791649)	The plan-wide viability assessment did not find M4(2) or M4(3) standards to have viability impacts on residential development. Therefore, it is justifiable to require independent viability studies to ensure housing needs are met as and when financial circumstances allow.
Policy Wording	Unclear if development is required to meet all of the criteria, or meet some or most of the criterion to be acceptable. Concern that meeting Part 3 may not comply with Part 2 requirements relating to the LHNA. Therefore, the Policy should be amended to require that either Part 2 or Part 3 is required.	SCWW3 Limited (55659233)	Criteria 2 and 3 are mutually achievable, and criteria 2 and 3 must be met. The Policy criterion comply with the NPPF (Paragraph 60), and PPG (Paragraph 007 (ID 56-007-20150327)), which sets out that a Local Plan must deliver a suitable range and mix of housing informed by its evidence.
Housing Mix delivery	Do not object to the Policy wording and therefore support. However, the deliverability of the proposed housing mix is not considered achievable based on the draft allocations due to predominantly flatted schemes and therefore the Policy	Vistry Group (55796577)	The Policy supports delivery of a mix of homes in line with national policy.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	risks being ineffective. Notes Fair Oaks development would offer sufficient land to provide the required full mix of housing.		



Table 11: Policy H6 Specialist Housing

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Affordable units	<p>The Council's plan-wide viability assessment concludes that specialist older persons housing was not viable. Therefore, the Policy is contrary to national guidance because it should not seek affordable housing from such development. In line with the PPG, the Policy should be amended to state that older persons housing will not be expected to provide affordable housing and not require viability assessments on a case-by-case basis.</p> <p>One respondent noted that if it is retained, an upper limit affordable housing figure for specialist housing should be added based on a robust viability assessment of Specialist Housing.</p>	<p>Churchill Living and McCarthy Stone (55791649);</p> <p>Retirement Villages Group (55658945);</p> <p>SageHaus Living (55783745)</p>	<p>The Council acknowledges the delivery of affordable accommodation as part of older persons housing developments is challenging, however, there is a significant need for this type of accommodation and the Policy is flexibly worded to enable a proportion of affordable accommodation where viable.</p>
Inadequate allocation	<p>Generally supportive of Policy, with exception to affordable housing requirements stated above. Notes omission site</p>	<p>Retirement Villages Group (55658945)</p>	<p>Noted. Land East of Snows Ride is not identified as an allocation in the Submission Local Plan.</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	Land East of Snows Ride and others should be allocated that deliver the required quantum of specialist housing, otherwise the plan is unsound.		
Affordable units	Welcome the principle of the Policy. Part 1) b) requires support from primary health and social care providing authorities. However, a lack of support should not be held against schemes which will deliver identified needs under part 1) a).	SageHaus Living (55783745)	Noted. Schemes seeking to meet the identified needs of older people and households are expected to receive the support of the relevant primary care and social care providing authorities.
Accessibility standards	Questions whether it would be far better to aim for the highest standard (M4(3)(2)(b)) than just the adaptable standard (M4(3)(2)(a)) which in previous experience, is pointless.	Karen Sinclair-Williams (39257857)	In line with national guidance, the Policy requires homes to meet M4(3)(2)(b) where there is an identified need via the Housing Register and a nomination agreement with a Registered Provider.
Support	Support the Policy. Notes that the Fair Oaks Airport site offers an opportunity to make provisions for a diverse community.	Vistry Group (55796577)	Noted. Fair Oaks is not an allocated site in the Submitted Surrey Heath Local Plan.



Table 12: Policy H7 Affordable Housing

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Support	Support for Policy H7: <ul style="list-style-type: none"> • Including setting appropriate targets and thresholds. • Support for 40% target. 	Abri (38928673); Thakeham Homes (20198241)	Support noted.
Planning permissions	Supports overall objectives but considers that the Policy should refer to occasions where affordable housing mix has already been agreed through an outline planning permission or Section 106.	Bloor Homes (55790785)	Mindenhurst is the subject of a separate site-specific Policy HA4 and Policy H7 makes reference to site specific allocations. If planning permission in outline has been granted that will be a material consideration in the determination of any future Reserve Matter planning application.
Viability	Objections on grounds of viability: <ul style="list-style-type: none"> • Objections to viability only being a consideration for negotiations in exceptional circumstances, which does not align with national policy. • Viability should be tested on a case-by-case basis. 	Bloor Homes (55790785); SageHaus Living (55783745)	Policy H7 is evidenced by the Local Plan Viability Assessment (2024). NPPG sets out in the section 'Viability and Planmaking' that "The role for viability assessment is primarily at the plan making stage." Para 002 Ref ID 10-002-20190509. Policy H7 sets out at criterion 3 that viability will be considered in exceptional circumstances. The Council therefore considers treatment of viability in Policy H7 is sound.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Specialist housing	Affordable housing should not be sought for specialist housing for older people.	Churchill Living and McCarthy Stone (55791649)	Policy H7 sets a flexible approach to the delivery of affordable housing in specialist housing for older people in recognition of the viability challenges identified in the Local Plan Economic Viability Assessment 2024. This approach ensures that much needed affordable housing for older people is delivered but only where it is viable to do so.
Housing tenure mix	Request to amend Policy to give more priority to affordable homes for rent and shared ownership (rather than affordable home ownership), in light of the LHNA 2024 evidence and proposed NPPF. Comment that 10% target of affordable rented seems low.	Abri (38928673); Karen Sinclair-Williams (39257857)	Policy H7 and the mix of affordable housing tenures is informed by the evidence in the Local Housing Need Assessment (2024).
First Homes	First Homes requirement: <ul style="list-style-type: none"> • Should not be definitive but based on evidenced demand. • Should have regard to proposed changes in Government policy. 	Thakeham Homes (20198241); Abri (38928673)	Policy H7 accords with the requirement to deliver First Homes as set out in NPPF 2023 (para 66). The Council is amenable to the addition of the requested wording “subject to evidenced demand” should the Inspector consider the wording is appropriate to include as a Main Modification.
Key workers	Recommend that in implementing Policy H7 the needs for affordable housing for NHS	NHS Property Services	Noted. This is a point for policy implementation



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	and other healthcare staff are considered.	(55790337)	and ongoing engagement.
Delivery	Objection raised and Policy considered unsound as the site allocations will not meet the policy requirement of 40% of units to be affordable. Historic affordable housing delivery provides a reason for allocation of Fair Oaks.	Vistry Group (55796577)	The soundness of the policy percentage requirements is evidenced by the Local Housing Need Assessment (2024) and the Local Plan Economic Viability Assessment (2024).



Table 13: Policy H8 Loss of Housing

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 14: Policy H9 Rural Exception Sites

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Restrictive criteria	<p>A number of respondents suggested that the Policy criteria is too restrictive. The justification for this was as follows:</p> <ul style="list-style-type: none"> Part 1b) goes beyond national policy, requiring demonstration that affordable housing need cannot be met within a settlement boundary before a site outside of a settlement area will be considered. This should be removed to encourage the delivery of affordable housing. Supporting text at Paragraph 3.114 should also be deleted. One respondent suggests that if retained, Policy should set out clearly how it can be demonstrated that a need cannot be met within a settlement boundary. Criterion 1c) should be deleted because it is highly restrictive and 	Abri (38928673); English Rural Housing Association (55785121)	<p>Agreed that Part 1b) and Paragraph 3.114 should be removed, and Main Modifications are proposed for consideration by the Local Plan Inspector accordingly.</p> <p>Locating Rural Exception Sites near to settlements supports the objective of avoiding provision of isolated new homes in the countryside and offers a number of sustainability benefits. However, to increase flexibility, a Main Modification is proposed to amend 1c) to read “the site adjoins, or is closely related to a rural settlement”, for consideration by the Local Plan Inspector.</p> <p>It cannot be guaranteed that Rural Exception Sites will include a mix of units by definition. As such it is appropriate to retain criterion 2c).</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	<p>counter-productive to the aim of rural exception.</p> <ul style="list-style-type: none"> • Criterion 2c) should be deleted because by definition, exception sites are small scale and naturally involve a mix of units. It is important that the primary purpose is to provide affordable housing in perpetuity which at times requires market housing. 		
Restrictive criteria	<p>The Policy is ineffective and unjustified. It will impact rural affordable schemes because the scale of potential Rural Exception Sites identified within the SLAA (which include sites of up to 35 dwellings) are potentially in excess of that appropriate within the context of Policy H9, which requires sites to be small. “Small scale” should be deleted from the start of the first criteria, as should “within the Borough” in Paragraph 3.108 as this is covered by a proposed amendment to SSI.</p>	<p>Lavignac Securities (55781537)</p>	<p>The Council is satisfied that relevant SLAA sites would be classed as small-scale under Policy H9. Rural Exception Sites are expected to be small in scale and accordingly the use of ‘small scale’ in the Policy is reasonable. Deleting the list of settlements to which the Policy applies would make the Policy less effective.</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Inclusion of Rural Exception Sites in SLAA	Within the housing supply the Council places a reliance on the provision of an average of 4.5 dwellings annually through Rural Exception Sites. The inclusion of this allowance is challenged on the basis of evidence of past performance and need.	Lavignac Securities (55781537)	The allowance for Rural Exception Sites is based on evidence of past permissions, as set out in SLAA Appendix I (2023).
Unconstrained scope for development	Concerned that the Policy will lead to excessive development in the Green Belt outside existing settlements, relating to Paragraph 3.107. Concerned over uncontrolled scope for development implied by Rural Exception Sites.	West End Village Society (19291073)	Criterion 1) will ensure that rural exception sites are only supported where their need is fully evidenced and justified.



Table 15: Policy H10 First Homes Exception Sites

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Supporting text	Notes the scope of the Policy and considers that the statement that First Homes cannot come forward in the Green Belt in Paragraph 3.122 must be retained. Support further explanation in Paragraph 3.123 that First Home Exception sites are limited to the Countryside beyond the Green Belt.	West End Village Society (19291073)	Comments noted. No modifications are proposed to the supporting text to this Policy.



Table 16: Policy H11 Gypsies and Travellers and Travelling Showpeople

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Policy Support	<p>A number of comments were received expressing support for the Council's Policy approach, including:</p> <ul style="list-style-type: none"> • Support of Policy which aims to meet accommodation needs for Gypsies and Travellers and Travelling Showpeople. • The approach is sound as a proactive approach has been taken to meeting identified needs. It is agreed that Broadford Lane should not be allocated. 	<p>Tandridge District Council (19301857); Philip Marsden (55785057)</p>	Noted.
Approach to addressing needs - noted	<p>A number of positive comments were received with respect to the Council's approach to addressing needs, including:</p> <ul style="list-style-type: none"> • General approach to addressing unmet needs noted. • Extensive efforts made in seeking to meet needs recognised. 	<p>Bracknell Forest Borough Council (55780769); Guildford Borough Council</p>	Noted.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	<ul style="list-style-type: none"> Welcomes the intention of the Council to meet own needs. 	(19285377); Hart District Council (19285377)	
Approach to addressing needs - unsound	Policy is not positively prepared or consistent with national policy as the Local Plan has a shortfall against its identified needs and it is unlikely any additional provision will be delivered on windfall sites over 100 units. The focus on urban regeneration and approach to Green Belt/environmental restrictions will limit further opportunities for suitable sites to come forward.	Vistry Group (55796577)	The Council acknowledges it is currently unable to meet the full accommodation needs of the Borough's Gypsy and Traveller and Travelling Showpeople communities through site allocations. To address the shortfall in allocated sites, Policy H11 supports the delivery of additional Gypsy and Traveller pitches and Travelling Showpeople plots on non-allocated sites. This may include but is not limited seeking provision on sites of over 100 units and will enable sites to come forward across a range of locations.
Unmet needs & the Duty to Cooperate	<p>A number of Comments were received regarding the capacity or suitability of unmet needs being addressed by neighbouring authorities, including:</p> <ul style="list-style-type: none"> Unmet needs could not be accommodated within their local area. 	Waverley Borough Council (19304993); Runnymede Borough Council (55636929);	SHBC notes the responses and would reiterate the extensive work that has been undertaken to seek to identify suitable sites to meet needs, in addition to extensive engagement undertaken through the duty to cooperate as set out in the Duty to Cooperate Compliance Statement.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	<ul style="list-style-type: none"> • Objection would be raised if unmet needs needed to be addressed in neighbouring local authorities through their Local Plans. It is necessary to clarify that there is no unmet need to be addressed and if an Inspector requires further work, this should be undertaken by Surrey Heath rather than neighbouring authorities. 	Bracknell Forest Borough Council (55780769); Hart District Council (19285377)	
Shortfall of allocated sites	<p>A number of comments were received regarding a shortfall in allocated sites, including:</p> <ul style="list-style-type: none"> • Considerable shortfall of sites for Gypsy and Traveller pitches and plots over the plan period noted. • Inspector will need to decide if unmet need goes to the heart of the Plan. • Noted extensive efforts have yielded limited positive results giving rise to 	Waverley Borough Council (19304993); Runnymede Borough Council (55636929); Guildford Borough Council (19285377)	<p>The Council acknowledges it is currently unable to meet the full accommodation needs of the Borough's Gypsy and Traveller and Travelling Showpeople communities through site allocations. The Council is not aware of any alternative sites suitable for allocation. It is noted Fair Oaks could provide 12 additional pitches, however taking account of the significant level of enabling development that would be required and that the scheme would ultimately only deliver a small proportion of the overall unmet need it is not considered that the benefits of allocating the site would outweigh the resulting harm</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	a concerning potential shortfall of sites.		to the Green Belt. To address the shortfall in allocated sites, Policy H11 supports the delivery of additional Gypsy and Traveller pitches and Travelling Showpeople plots on non-allocated sites.
Criterion 5	Criterion 5 is ambiguous as it references use of conditions which seem to relate to all traveller sites but the subheading infers that this criterion only relates to Travelling Showpeople.	Bracknell Forest Borough Council (55780769)	Agree that further clarification would be beneficial. An additional (minor) modification is proposed to introduce heading 'Use of Planning Conditions' above Criterion 5.
Flood Risk	Notwithstanding the requirement to comply with Policy E6, for clarity it would be useful to have a bullet point in the Policy wording to ensure a route of safe access and egress is provided in the event of a flood.	Environment Agency (19283937)	It is considered that Policy E6 criterion 3a addresses this point.



Table 17: Policy H12 Site allocations for Gypsies and Travellers and Travelling Showpeople

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Meeting needs	It is welcomed that Surrey Heath intends to meet its own Traveller needs. It should be clarified that there is no unmet need to be addressed. Meeting unmet needs should not fall to neighbouring authorities.	Hart District Council (19285377)	SHBC notes the response from HDC and would reiterate the extensive work that has been undertaken to seek to identify suitable sites to meet needs. This has included a number of letters to adjoining local authorities to ask whether any other authority is able to help meet unmet needs, and holding a briefing session for local authorities to set out the work undertaken and the inclusion of a more flexible policy approach to determine future applications. As discussed and explained at a recent duty to cooperate meeting, it is not proposed that any modifications to the Local Plan are suggested as a result of these comments.
Site Allocation	Due to significant fluvial flood issues identified across the site and locality, the site being a historic landfall and on a bedrock secondary aquifer, would expect additional requirements with respect to river	Environment Agency (19283937)	As set out in the agreed Statement of Common Ground with the Environment Agency, the Council agrees that further site-specific criterion relating to risk assessment and restoration should be included in Policy H12 and a Main Modification is proposed for



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	restoration and corridor protection, flood risk assessment and mitigation and a risk assessment for controlled waters.		consideration by the Local Plan Inspector.
H12 – Omission Site	Policy is unsound as there is a shortfall in provision. The Policy should be amended to include allocation of 12 pitches at Fair Oaks, along with further sites to meet needs over the plan period.	Vistry Group (55796577)	The Council acknowledges it is currently unable to meet the full accommodation needs of the Borough's Gypsy and Traveller and Travelling Showpeople communities through site allocations. The Council is not aware of any alternative sites suitable for allocation. It is noted Fair Oaks could provide 12 additional pitches, however taking account of the significant level of enabling development that would be required and that the scheme would ultimately only deliver a small proportion of the overall unmet need it is not considered that the benefits of allocating the site would outweigh the resulting harm to the Green Belt. To address the shortfall in allocated sites, Policy H11 supports the delivery of additional Gypsy and Traveller pitches and Travelling Showpeople plots on non-allocated sites.



Table 18: Policy CTCI Camberley Town Centre

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Stakeholder engagement	Welcomes reference in supporting text to engagement with stakeholders regarding the future relocation of Camberley Theatre.	Theatres Trust (19304897)	Noted.
Mix of uses and delivery	<p>Supports the regeneration of Camberley Town Centre but question the amount of housing which is being directed to it.</p> <p>Concerns raised are:</p> <ul style="list-style-type: none"> • Whether high density flatted accommodation will meet the needs of housing both in the market and affordable sectors. • Lack of access to accessible open green space. • Lack of master planning. • Multiple existing ownerships. • Highways impacts. • Lack of SANG. • Commercial practicalities of delivery. 	Persimmon Homes Thames Valley (39477697)	<p>Focusing development in Camberley Town Centre is consistent with national planning policy to deliver development in the most sustainable locations.</p> <p>The support for town centre regeneration is welcomed. London Road Block (LRB) and East of Knoll Road (LEKR) are Council owned and promoted sites, and the Council is confident in the evidenced supply and delivery trajectory. The site allocations are informed by masterplanning and viability work, with further information set out in the Housing Supply Topic Paper 2024.</p> <p>Green space is accessible from the town centre sites and the Council has sufficient SANG to support delivery of these town centre sites. Overall, the site</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
			<p>allocations will deliver a mix of homes to address identified needs.</p> <p>The corporate commitment to the delivery of town centre regeneration is also evidenced by the Camberley Town Centre Strategic Vision to 2034, published in November 2024, with the work on both sites being led by a Regeneration Working Group, chaired by the Leader of the Council.</p>



Table 19: Policy CTC2 Camberley Town Centre Primary Shopping Area

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 20: Policy CTC3 Movement and Accessibility

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Support	Support Policy and believe it to be sound.	Network Rail (55788833)	Noted.
Car Clubs	Suggest reference to car clubs is included within criterion 2 of the Policy.	Surrey County Council (19304577)	As set out in the agreed Statement of Common Ground Update with Surrey County Council, the Council agrees that for clarity it would be beneficial to include this and a Main Modification is proposed for consideration by the Local Plan Inspector.



Table 21: Policy CTC4 Land East of Park Street, North of Princess Way

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 22: Policy ERI Economic Growth and Investment

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Support for Policy	Supportive of Policy.	Anglesea Capital (55781601); The Royal Borough of Windsor and Maidenhead (19304673)	Noted.
Support for Policy	Supportive of Policy in broad terms, but modifications requested in relation to the principle of removing designated strategic employment sites from the Green Belt.	ADP Fairoaks Ltd (55800481); Vistry Group (55796577)	Noted. The Green Belt Exceptional Circumstances Topic Paper (2024) sets out that there are not considered to be exceptional circumstances that warrant the release of land to meet employment needs.
Scale of land identified for employment uses	Plan does not allocate sufficient land for employment growth. Reasons set out include:	ADP Fairoaks Ltd (55800481); Vistry Group	The proposed emphasis on redevelopment opportunities is appropriate because the Borough is constrained by the Greenbelt and the Green Belt Exceptional Circumstances Topic Paper (2024) sets out that there are not considered to be exceptional



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
	<ul style="list-style-type: none"> • A lack of ambition for provision of economic development. • An overreliance on the redevelopment of buildings within site boundaries of existing employment areas. • The plan does not address the ongoing historic shortage in employment land. 	(55796577)	circumstances that warrant the release of land to meet employment needs. The Employment Land Technical Paper (2023) and the Employment Support Assessment (2023) sets out that the plan supports employment uses, taking account of needs and opportunities.
Fairoaks Airport Strategic Employment Site	Comments made with reference to Policy ER1, but in specific in relation to 'Fairoaks Airport and Chobham Business Centre Strategic Employment Site' boundary and the site's Green Belt status – see main issues for Policy ER2.	ADP Fairoaks Ltd (55800481); Vistry Group (55796577)	Noted. No amendments to the employment site boundary, or Green Belt boundary are considered appropriate.



Table 23: Policy ER2 Strategic Employment Sites

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Policy support	Support Policy.	Anglesea Capital (55781601)	Support noted.
Ancillary facilities	Examples of acceptable non-employment ancillary facilities within Strategic Employment Sites should be expanded to include a wider range of facilities that support staff wellbeing and support flexible working.	UCB (39605953)	A variety of examples are set out in the Plan and the examples given are not to the exclusion of other complementary uses. No amendment proposed.
Film and TV industry	<p>A number of comments were raised in respect of the film and TV industry, including:</p> <ul style="list-style-type: none"> • Priority economic sectors list should be expanded to include Film and TV industry. • Evidence indicates that there is a 'Golden Triangle' hub for film and TV production sites in the area of the M4/M3 west of London. 	<p>Netflix Studios UK Ltd (39536289); ADP Fair Oaks Ltd (55800481)</p>	Film studios are a footloose industry and the Borough is constrained, including Green Belt protection. Sufficient opportunities to support economic growth are available in employment sites overall, in relation to employment sectors as a whole. Furthermore, the Government's Modern Industrial Strategy references creative industry clusters which are located across the UK. No amendment proposed.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Name of site	The Strategic Employment Site referred to as 'Erl Wood, Windlesham', should be renamed as 'UCB Windlesham Campus'.	UCB (39605953)	An additional (minor) modification is proposed to amend site name to 'UCB Windlesham Campus'.
Employment Site boundary	<p>The boundary of Fairoaks Airport and Chobham Business Centre Strategic Employment Site, should be extended to incorporate part of the airfield. The reasons given included:</p> <ul style="list-style-type: none"> • Current site boundary is constraining redevelopment potential. • Boundary of Chobham Business Centre has been amended (between Reg 18 and Reg 19 Plans) which shows there is potential to amend boundaries. 	ADP Fairoaks Ltd (55800481); Vistry Group (55796577)	This site falls within the Green Belt where development opportunities are more limited. A boundary which excludes wider areas of open land is considered appropriate in this context, particularly given that it is not necessary to allocate further land at Fairoaks to meet future employment needs.
Fairoaks Strategic Employment Site should be removed from Green Belt	Fairoaks Airport and Chobham Business Centre Strategic Employment Site, should be removed from Green Belt, in order to provide greater support to economic	Vistry Group (55796577); ADP Fairoaks Ltd	The Green Belt Exceptional Circumstances Topic Paper (2024) sets out that there are not considered to be exceptional circumstances that warrant the release of land to meet employment needs.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
	development. Reasons for this include claims that the wider Fair Oaks site (i.e. airfield) is not performing any significant Green Belt function and much is 'previously developed land' and is anticipated to be identified as grey belt in proposed revised NPPF.	(55800481)	
Reason for Strategic Employment Site designation	Justification for Fair Oaks Airport and Chobham Business Centre to be a Strategic Economic Site (as opposed to Locally Important) is inaccurate. The site contains few aviation related employees and there is very little interrelationship with the current operational airfield. Majority of employees are in small businesses covering a range of sectors, together with film and media representation.	ADP Fair Oaks Ltd (55800481)	The Council refers to the presence of both aviation-related businesses and other businesses not related to aviation, at the site. No amendment is considered necessary.



Table 24: Policy ER3 Locally Important Employment Sites

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 25: Policy ER4 Yorktown and Watchmoor Business Parks

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Policy support	Supportive of ER4, in particular in relation to redevelopment of vacant office space into other employment land uses.	Anglesea Capital (55781601)	Support noted.
Transport Assessment at application stage	M3 Junction 4 experiences peak time congestion. Assessment of impacts on M3 J4 will be required for applications proposing increase in employment use at Watchmoor Park, by way of a Transport Assessment.	National Highways (55788545)	Noted and acknowledged in the Statement of Common Ground with National Highways. Policy ER4 requires assessment of transport impacts. No amendment required.



Table 26: Policy ER5 Rural Economy

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 27: Policy ER6 Frimley Park Hospital

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Future of Frimley Park Hospital	Principles of the Policy are supported. Seek a modification to the Policy or supporting text to provide additional flexibility for alternative uses to be developed on the Hospital site towards the end of the Plan period.	Frimley Health NHS Foundation Trust (55791521)	The Council agrees that for clarity, it would be helpful to add some additional wording regarding the future of the Hospital site and a Main Modifications is proposed to Paragraph 4.89 for consideration by the Local Plan Inspector.
Policy wording	Seek an amendment to Policy numbering for clarity, particularly regarding Transport Strategy requirements (Criterion 1b).	Frimley Health NHS Foundation Trust (55791521)	There was an error in the numbering in this Policy in the online version of the Local Plan. Criterion 1b relating to a Transport Strategy should have shown as having three sub criteria.



Table 28: Policy ER7 Edge of Centre and Out of Centre Proposals

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Policy wording – impact assessments	Suggest the Policy would benefit from incorporating some text that is currently in supporting text (Para 4.107) relating to impact assessments. This would help ensure consistency with the NPPF and therefore soundness.	Bracknell Forest Council (55780769)	As set out in the agreed Statement of Common Ground Update with Bracknell Forest the Council agrees that to provide consistency with the NPPF it would be beneficial to include an amendment to criterion 3 and a Main Modification is proposed for consideration by the Local Plan Inspector.
Policy wording - consistency	Note some tension between Policy ER7 and Policy ER8 (criterion 5) in relation to town centre uses in designated centres.	Bracknell Forest Council (55780769)	The Council consider that both Policies are appropriately worded. Policy ER7 sets the high level direction whilst Policy ER8 sets out more detailed criteria for consideration in determining planning applications.



Table 29: Policy ER8 District and Local Centres

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 30: Policy ER9 Neighbourhood Parades

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 31: Policy ERI0 Old Dean

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 32: Policy INI: Infrastructure Delivery

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Support	General support the inclusion of the Policy/Policy wording.	Environment Agency (1928393); Vistry Group (55796577); Network Rail (55788833); Tandridge District Council (19301857); Thames Water (41965281); UCB (39605953)	Noted.
Evidence Base – Water Cycle Study	The Policy is unsound as the Water Cycle Study needs updating to understand how allocated sites can be delivered in particular in relation to wastewater capacity generally and capacity at Lightwater and Camberley	Environment Agency (1928393)	Noted, the Council has commissioned a new Water Cycle Study. To reflect this, and as set out in the agreed Statement of Common Ground Update with the Environment Agency, a Main Modification is proposed to Paragraph 5.12 of the supporting text to Policy INI for consideration by the Local Plan



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	Sewage Treatment Works.		Inspector.
Evidence Base - Viability	Consider that the SI06 headroom in the viability study is low and should include a separate cost where a healthcare contribution is required. Unable to determine whether viability demonstrates that healthcare policy requirements can be delivered and would welcome discussions to determine a reasonable cost assumption that could be used on future viability assessments.	NHS Property Services Ltd (55790337)	Comments noted. The Local Plan Viability Assessment uses information from a range of sources that was tested through engagement with the development industry. The Council welcomes ongoing engagement with relevant stakeholders on delivering infrastructure alongside new development.
Sewage and Wastewater infrastructure	Upgrades will be required to the sewage system but developer cooperation with Thames Water appears inadequate and questions where future costs will lie and whether these should be highlighted.	David Natolie (19723553)	Policy INI specifically refers to the need for adequate wastewater capacity and the need to engage with Thames Water (3vii). The Council is also undertaking a new Water Cycle Study.
Wastewater infrastructure	Amendments sought to the supporting text to clarify that network improvements can be secured through planning conditions.	Thames Water (41965281)	As set out in the agreed Statement of Common Ground Update with Thames Water, the Council agrees that reference to conditions should be added to Paragraph 5.7 and a Main Modification is proposed for consideration by the Local Plan Inspector.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Health infrastructure	Consider the Policy to be sound as drafted. Suggest that where applicable health infrastructure should be identified as essential infrastructure. Emphasise the importance of implementation mechanisms to ensure healthcare infrastructure is delivered alongside new development. Highlight the need for partnership working and suggest content for providing further guidance on the determination of appropriate contributions.	NHS Property Services Ltd (55790337)	Comment on soundness noted. The weight to be given to a particular type of infrastructure will depend on the scale and nature of any development. The relevant ICBs are consultees on planning applications and in line with Policy INI their views will be sought on the need for, and delivery of infrastructure.
Health infrastructure	All GP practice premises in the Borough are at capacity so any increase due to housing development will require capital contributions through planning obligations and/or CIL to mitigate the increased population. Additional capacity will also be required for acute care capacity at Frimley Park Hospital and for paediatric services. Assess that Primary Care GP providers will require circa	NHS Frimley and NHS Surrey Heartlands (54787169)	Noted. Engagement with the relevant Integrated Care Boards will take place in relation to planning applications as well as engaging on more strategic matters and funding through CIL. The IDP will be reviewed on a regular basis to inform the Infrastructure Funding Statement.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	800sqm of primary care floorspace to meet the forecast population which could cost between £3 - £5.75m.		
Education	Minor change to supporting text proposed on the age range for Special Educational Needs support.	Surrey County Council (19304577)	As set out in the agreed Statement of Common Ground Update with Surrey County Council, the Council agree that for accuracy an amendment to Paragraph 5.13 would be beneficial and a Main Modification is proposed for consideration by the Local Plan Inspector.
Electricity infrastructure	Power supply is a challenge, particularly for strategic employment sites. The LPA must ensure infrastructure is available for new development and existing development, taking account of the increased in-combination demand for power, including decarbonisation/electrification of existing development.	UCB (39605953)	Policy IN1 seeks to ensure that appropriate infrastructure is in place alongside new development. This would include access to a suitable power supply. Other policies support reductions in carbon emissions.
General	Policy is supported subject to updates to the IDP to take account of the allocation of Fair Oaks.	Vistry Group (55796577)	Fair Oaks is not an allocation in the Submission Local Plan.



Table 33: Policy IN2 Transportation

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Support	Support for the Policy.	Network Rail (55788833); National Highways (55788545); Vistry Group (55796577)	Noted.
Railway link improvements	Suggest reinstating the link at Frimley Green between the local railtrack and the main line services, near land off Spencer Close.	David Chesneau (19291009); David Natolie (19723553)	Network Rail has previously confirmed (in comments on the Draft Local Plan) that it is not feasible to re-instate the 'Sturt Chord' at Frimley (currently safeguarded under saved Policy M18 in the Local Plan, 2000) and this has been supported by other evidence prepared since the previous Local Plan was adopted. In the light of this, the Council is unable to justify safeguarding this land for a future rail link.
Site specific transport links	Public transport and cycle infrastructure should be improved to support sustainable access to UCB Windlesham Campus. Future developments in the	UCB (19723553)	Specific active travel schemes are not detailed in the Local Plan. Policy IN2 supports improvements in sustainable and active travel and improvements will be delivered through measures such as the Local



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	local area should contribute to improvements to sustainable travel options, such as safe cycle routes.		Cycling and Walking Infrastructure Plan.
Electric vehicle charging	The Plan does not fully appreciate the need for greater power and cabling required for electric vehicle charging. Has need and disruption of digging up roads been considered?	David Natolie (19723553)	The detailed impacts of works on the highway network in providing additional power supply is not a matter for the Local Plan but where appropriate may be regulated by condition on a planning permission. The Council has sought to engage electricity providers in the Local Plan process.
Impact on highway network	Notes no significant adverse effects on the highway network in Bracknell Forest.	Bracknell Forest Borough Council (55780769)	Noted.
Promotion of Fairoaks	Comment that development at Fairoaks will deliver a scheme that is Policy compliant with Policy IN2 with reference to the transport feasibility appraisal Appendix submitted as part of the representation.	Vistry Group (55796577)	Noted. Fairoaks Airport is not an allocated site in the Submitted Surrey Heath Local Plan.



Table 34: Policy IN3 Digital and Telecommunications Infrastructure

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 35: Policy IN4 Community Facilities

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Support	Support for the Policy.	Vistry Group (55796577)	Noted.
Healthcare facilities change of use	Change of use for health facilities to non-community facilities use should not be subject to requirement to demonstrate that the facility is no longer required, or the facility should remain in community use. Healthcare facilities requirements are already subject to needs appraisal process by local health commissioners and NHS England.	NHS Property Services Ltd (55790337)	Confirmation of the disposal decision taken by relevant local or national health services commissioning body would be acceptable as evidence to satisfy the Policy. No modification to Policy is proposed.
Promotion of Fair Oaks	Comment that development at Fair Oaks will deliver a scheme that is policy compliant with Policy IN4 with reference to the Vision document Appendix submitted as part of the representation.	Vistry Group (55796577)	Noted. Fair Oaks Airport is not an allocated housing site in the Submitted Local Plan.



Table 36: Policy IN5 Green Infrastructure

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Support	Support for the Policy.	Natural England (55790337); Vistry Group (55796577)	Noted.
Promotion of Fairoaks	Comment that development at Fairoaks will deliver a scheme that is Policy compliant with Policy IN5 with reference to the Vision document Appendix submitted as part of the representation.	Vistry Group (55796577)	Noted. Fairoaks Airport is not an allocated housing site in the Submitted Surrey Heath Local Plan.



Table 37: Policy IN6 Green Space

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Requirement for re-provision	The Policy currently sets out no requirement to replace provision that will be lost, whereas NPPF Paragraph 103(b) requires re-provision. Suggests amendment to Policy criterion 2(a)(i).	Sport England (39521313)	Agree amendment would be appropriate. A Main Modification to Policy IN6 criterion (2)(a)(i) to require re-provision is proposed for consideration by the Local Plan Inspector.
Opposition to designation	<p>Objection to allocation of Riverside Way at Watchmoor Park as Green Space on the basis that:</p> <ul style="list-style-type: none"> • Not in compliance with national Policy. • Site has limited function • Site already within the Countryside Beyond the Green Belt' designation. • Other publicly accessible Green Space in the vicinity. • Overlap of Green Space and employment designation. • Discrepancy noted between Green Space Assessment 	Anglesea Capital (55781601)	Following a review of the site, agree amendment would be appropriate. A Main Modification to the Policies map, to remove Local Green Space designation of Riverside Way, is proposed for consideration by the Local Plan Inspector.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
	evidence base and the policies map.		
Opposition to designation	<p>Plan is not legally compliant and unsound due to designation of the Broom Lane and Red Lion Road allotments as 'Green Space', owned by the Chobham Poor Allotment Charity. The justification for opposing the designations includes:</p> <ul style="list-style-type: none"> • Inaccurate boundary for Broom Lane allotment, incorporating open fields and private gardens. • Charity is not required to provide allotment space and the designation could be directly adverse to the charity's interests. • Suggest there is not a need for allotments in this area, citing poor uptake. • Suggests that current charitable ownership offers sufficient protection. • Charity should have been directly consulted regarding the designation. 	Chobham Poor Allotment Charity (55638049)	<p>The Green Space Background Paper (2023) sets out the methodology for identifying Green Spaces, including allotments. Following a review of the Broom Lane allotments site, it is agreed that the boundary should be amended and this is proposed as a Main Modification for consideration by the Local Plan Inspector. No change is proposed to the Red Lion Road allotments.</p> <p>Chobham Poor Allotments were consulted at all stages of the Plan making process, including as part of the Draft Surrey Heath Local Plan: Preferred Options (2019 - 2038) consultation when Green Space designations were first proposed.</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
	If retained, amendments to IN6 requested relating to alternative uses and public accessibility.		



Table 38: Policy IN7 Indoor and Built Sports and Recreational Facilities

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Support Policy	Support for the Policy, notes benefits of the Fair Oaks proposal (which is an omission site).	Vistry Group (55796577)	Noted. This representation does not affect the Policy IN7. No change proposed to Policy.
Circumstances for loss of facilities	Objection to criterion 2(a) which permits the loss of facilities where the existing use is unviable. With reason given that this approach conflicts with Paragraph 103 of the NPPF in addition to Sport England's planning objectives and Planning for Sport principles.	Sport England (39521313)	Do not consider the approach conflicts with the NPPF or Sport England objectives because both 2a (unviable) <u>and</u> 2b (no alternative uses) would need to apply, so there would be no loss of the facility if only 2a applies. No change proposed to Policy.



Table 39: Policy EI Thames Basin Heaths Special Protection Area

Topic	Main Issue	Respondent (ID Number)	SHBC summary response
Policy wording	Welcome Policy but would welcome addition of reference to SAMM inflationary increases.	Natural England (42033025)	The Council considers that SAMM and SANG tariffs are best kept outside Local Plan policy, which sets the overall principles of the policy approach.
Policy wording	Suggested amendments in the interest of soundness relating to: <ul style="list-style-type: none"> Land use categories. Apparent contradiction between criterion 1 and 3. Tightening reference to alternative measures. 	Bracknell Forest Council (55780769)	As set out in the agreed Statement of Common Ground update with BFC, the Council agrees for clarity it would be beneficial to amend the Policy wording and Main Modifications are proposed for consideration by the Local Plan Inspector.
Support	Note and support.	The Royal Borough of Windsor and Maidenhead (19304673)	Noted.
SANG capacity	Questions raised in relation to SANG capacity, including: <ul style="list-style-type: none"> If there is sufficient strategic SANG planned to support 	Persimmon Homes Thames Valley (39477697);	As set out in the agreed Statement of Common Ground update with Natural England, sufficient SANG capacity has been identified for the Local Plan in appropriate locations. The Habitats Regulation



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	<p>delivery of the allocations, noting many urban locations will not be able to deliver bespoke on-site solutions, and capacity to serve all residential development in the emerging Plan.</p> <ul style="list-style-type: none"> If identified SANGs in the Topic Paper are suitable and deliverable in the timescales required to serve the Local Plan allocations, relating to Plan delivery. 	Vistry Group (55796577)	Assessments provides more detail on Local Plan SANG provision in the appropriate assessment for recreational pressure.
SANG	Notes they have land available for SANG.	Persimmon Homes Thames Valley (39477697)	Noted.
SANG	Notes proposed development at Fairoaks will deliver policy compliant SANG, providing improved SANG buffer in the East.	Vistry Group (55796577)	Noted.



Table 40: Policy E2 Biodiversity and Geodiversity

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Policy support	<p>Support Policy approach, with particular references made to:</p> <ul style="list-style-type: none"> • Production and implementation of Local Nature Recovery Strategy. • Inclusion of hierarchy of designated sites. 	<p>Natural England (42033025); Surrey County Council (19304577); Surrey Wildlife Trust (20013025)</p>	Noted.
Policy clarity and accuracy	<p>Suggestions for additional text to be added to the Policy and supporting text, including references to:</p> <ul style="list-style-type: none"> • Hierarchy approach of ‘avoid, mitigate, compensate’. • The ‘local conservation status’ of protected species. • ‘Habitat of Principal Importance’ as legislative term for priority habitat. • Request for definition/interpretation of the word ‘integrity’. 	<p>Surrey Wildlife Trust (20013025)</p>	<p>Agree it would be beneficial to amend the wording Paragraph 6.20 in relation to legislation references and a Main Modification is accordingly proposed for consideration by the Local Plan Inspector.</p> <p>Not necessary to add reference to ‘remediated soils’.</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
	<ul style="list-style-type: none"> • Include remediated soils, as part of planning considerations of impact on soil quality. 		
Additional opportunities	<p>Suggestions for additional text to be added to the Policy and supporting text, including:</p> <ul style="list-style-type: none"> • Additional reference to new evidence identifying Urban Biodiversity Opportunity Areas across Surrey. • Additional text to better explain the benefits of the Policy, for example mentioning the role of aquatic habitats in water supply for human consumption. 	Surrey Wildlife Trust (20013025)	<p>No reference to be added to 'Urban Biodiversity Opportunity Areas' as the Council has not verified this evidence source. Spatial priorities for biodiversity, including in urban areas, will be mapped in the Local Nature Recovery Strategy.</p> <p>Role of aquatic habitats in water supply is noted, but no modification is required to the Local Plan.</p>



Table 41: Policy E3 Biodiversity Net Gain (BNG)

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Policy wording terminology	Policy wording is unclear because of use of term 'advised' in relation to national target. The national target is mandatory, not 'advised' (as in 'discretionary').	Netflix Studios UK Ltd (39536289)	Agree that the national target is mandatory, not discretionary. A Main Modification to delete the word 'advised' from the Policy to avoid misinterpretation is proposed for consideration by the Local Plan Inspector.
Policy support	Policy is supported, in particular: <ul style="list-style-type: none"> • 20% BNG target, including taking account of Surrey Nature Partnership's advised target. • Inclusion of hierarchy for off site gain provision • Addressing BNG in addition to European Habitats. mitigation measures including SANG provision, with some suggested amendments for clarity of supporting text. 	Surrey Wildlife Trust (20013025); Natural England (42033025); The Royal Borough of Windsor and Maidenhead (19304673)	Noted.
Exemptions	Further details on exemptions should be set out and these should be in line with	Bloor Homes	Policy E3 states that exemptions will be aligned with national requirements. PPG states that Plan-makers



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
	Planning Practice Guidance.	(55790785)	should not include policies which duplicate statutory framework. No further details are considered necessary.
20% BNG requirement is not justified	<p>Oppose minimum target of 20% BNG (higher than national mandatory target of 10%) because higher target is not justified with sufficient evidence for need. Reasons given included:</p> <ul style="list-style-type: none"> • Historic biodiversity losses in Surrey are not worse than those observed nationally. • Surrey Nature Partnership (State of Surrey's Nature) report was authored in 2017, before the mandatory requirements in the Environment Act 2021. 	<p>Bloor Homes (55790785); Home Builders Federation (20211169); Persimmon Homes Thames Valley (39477697); Thakeham Homes (20198241); Vistry Group (55796577)</p>	<p>The State of Surrey's Nature (2017) evidences Surrey's rates of historic biodiversity loss as even more severe than that of the nation, which justifies local planning policy to require a higher target to halt and attempt to recover these losses. The conclusions in the study remain valid, notwithstanding the study's publication date preceding the Environment Act.</p>
20% BNG requirement is not viable/deliverable	<p>Minimum target of 20% BNG (higher than national mandatory target of 10%) is not viable. Reasons given included:</p>	<p>Churchill Living and McCarthy Stone (55791649);</p>	<p>The Local Plan Viability Assessment (LPVA) 2024 supports delivery of 20% BNG and as set out in the LPVA, as the Policy will be embedded, then the cost above the nominal BNG costs identified in the assessment should be absorbed via reductions in</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
	<ul style="list-style-type: none"> • Not supported by positive viability evidence for all housing typologies, in particular older persons housing. • Cost of credits (and local or national off site 'Biodiversity units') has been underestimated – costs of biodiversity units are in the region of £30k to £50k per biodiversity unit. • Rural sites. • Urban sites proposed for high density development have limited potential for onsite habitat enhancement potential, yet may potentially contain high distinctiveness baseline habitat (Open Mosaic Habitat). • BNG may result in reduction of developable site area, meaning site capacity assumptions are over estimated. 	<p>Bloor Homes (55790785); Home Builders Federation (20211169); Netflix Studios UK Ltd (39536289); SageHaus Living (55783745); Somerton Development Projects (39484257)</p>	<p>land values and not as a reduction in development viability.</p> <p>In addition, SHBC is currently working on bringing forward a biodiversity gain site to provide off-site Biodiversity units in Surrey Heath.</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
	Furthermore, 20% BNG target will impact viability of other planning targets such as affordable housing targets.		
Spatial hierarchy for offsetting site location	Hierarchy for location of off-site compensation/gain is welcomed.	Surrey Wildlife Trust (20013025); Natural England (42033025); Vistry Group (55796577)	Noted.
Spatial hierarchy for offsetting site location	Hierarchy for location for off-site compensation/gain is unnecessary and should be removed from Policy.	Home Builders Federation (20211169)	The hierarchy in Policy E3 is broadly aligned with the statutory Biodiversity Metric spatial risk factor. Further to this, Policy E3 seeks to direct delivery of offsite compensation to within the County of Surrey, to support delivery of the Surrey Local Nature Recovery Strategy.
Policy wording	Various other amendments to policy wording and supporting text, for clarity and explanation in relation to ecology and biodiversity best/emerging practice	Surrey Wildlife Trust (20013025)	Agree it would be beneficial to amend the wording of criterion 4 and Paragraph 6.35 and Main Modifications are therefore proposed for consideration by the Local Plan Inspector.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
	<p>and guidance, for example with reference to:</p> <ul style="list-style-type: none"> • Consistency with terminology in the Environment Act, as well as evidential requirements for Biodiversity Net Gain. • Surrey's State of Nature report evidence base • Irreplaceable habitats in the context of Biodiversity Net Gain. • Grammatical and phrasing adjustments. • The definition/description of Environmental Net Gain. 		



Table 42: Policy E4 Pollution and Contamination

Topic	Main Issue	Respondent (ID Number)	SHBC Summary response
Support Policy	Overall Policy approach is supported.	Environment Agency (19283937) Surrey Wildlife Trust (20013025)	Noted.
Light pollution and wildlife	Suggested amendment to supporting text to add specific reference to the wildlife of watercourses being highly sensitive to light pollution.	Environment Agency (19283937)	As set out in the agreed Statement of Common Ground Update with the EA, the Council agrees that to address light pollution impacts, the wording of supporting text Paragraph 6.52 is amended and a Main Modification is proposed for consideration by the Local Plan Inspector.
Scope of Policy	Suggested amendment for clarification purposes, to explicitly state that the scope of “pollution” in Policy E4 excludes greenhouse gas emission, which are covered by other policies.	Surrey Wildlife Trust (20013025)	The Plan should be read as a whole and specifying the exclusion of Greenhouse Gas emissions from Policy E4 is not necessary.



Table 43: Policy E5 Renewable and Low Carbon Energy and Heating Systems

Topic	Main Issue	Respondent (ID Number)	Surrey Heath response
Support	Welcome Policy in helping to deliver action on climate change.	The Royal Borough of Windsor and Maidenhead (19304673)	Noted.
National Policy	Broad support but suggest Part 2 of the Policy should be reframed to latest building regulations and national policy.	Bloor Homes (55790785)	There is no restriction on Local Plans going beyond national requirements relating to low/zero carbon design.
Co-benefits	Could mention opportunities for co-delivery of low-carbon scheme elements with biodiversity recovery and net gain delivery.	Surrey Wildlife Trust (20013025)	The Plan should be read as a whole and other policies, such as SS3, highlight the co-benefits of delivering action on climate change.



Table 44: Policy E6 Flood Risk and Sustainable Drainage

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Strategic Flood Risk Assessment evidence base	Consider the Policy wording is adequate, but the Strategic Flood Risk Assessment (SFRA) is not up to date and a number of housing allocations cannot be delivered without this evidence. Note that work has commenced, and the Environment Agency is committed to working with Surrey Heath to address this soundness point.	Environment Agency (19283937)	The SFRA is now at draft report stage and the Environment Agency are engaged in commenting upon this prior to agreement to the final Report.
Policy wording - Surface water drainage design specification	Criterion 3(d) – Suggest the wording is incorrect and should be revised to remove reference to 1 in 100 storm event.	Surrey County Council (19304577)	As set out in the agreed Statement of Common Ground Update with Surrey County Council, the Council agrees that for accuracy the wording of 3(d) is amended and a Main Modification is proposed for consideration by the Local Plan Inspector.
Policy wording - Surface water management	Support the aims of the Policy in relation to SuDS and protection of basements. Suggested Policy amendments: Criterion 4 (a) should reference the drainage hierarchy. Criterion 4 c should reference a	Thames Water (41965281)	As set out in the agreed Statement of Common Ground Update with Thames Water, the Council agrees that for clarity the amendments would be beneficial and Main Modifications are proposed to Criterion 4a and 4c and supporting text.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	maximum runoff rate.		
Policy wording – Surface Water management and biodiversity	Criterion 4(d) - could be expanded to include the substantial co-delivery opportunities of SuDS and wetland biodiversity and referencing that water efficiency indirectly benefits the natural water environment.	Surrey Wildlife Trust (20013025)	Noted. These opportunities will be highlighted to Surrey County Council for the Local Nature Recovery Strategy, which is referred to elsewhere in the Plan. No amendment to IN6 considered necessary.
Policy wording – impact on groundwater resources	Criterion 5 - Propose amendment regarding ensuring development has no adverse impact on groundwater resources and maintenance of public water supplies.	Environment Agency (19283937)	As set out in the agreed Statement of Common Ground with the EA, the Council agrees that for clarity it would be beneficial to include an amendment to E6(5) and an amendment to the Policy and the supporting text is proposed as a Main Modification for consideration by the Local Plan Inspector.
Policy wording - Catchment-scale land management opportunities	Criterion 6 – could be expanded to reference the unique position of Surrey Heath in presenting biodiversity enhancement opportunities through re-wetting projects on lowland heathland. Related amendments suggested to supporting text.	Surrey Wildlife Trust (20013025)	Noted. These opportunities will be highlighted to Surrey County Council for the Local Nature Recovery Strategy, which is referred to elsewhere in the Plan. No amendment to E6 considered necessary.



Table 45: Policy E7 Watercourses and Water Quality

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Support	Policy approach welcomed.	Environment Agency (19283937); Surrey Wildlife Trust (20013025)	Noted.
Policy wording	Suggest that E7(f) conflicts with Paragraph 6.85 in that it doesn't specify a width of buffer for ordinary watercourses.	Surrey County Council (19304577)	The Council does not consider that the supporting text conflicts with the Policy criterion but rather provides further detailed guidance.
Policy wording	Criterion I – expand the Policy scope to cover all watercourses.	Environment Agency (19283937)	As set out in the agreed Statement of Common Ground update with the EA, the Council agrees for consistency with supporting text it would be beneficial to amend the wording to Criterion I and a Main Modification is proposed for consideration by the Local Plan Inspector.
Policy wording	Criterion Ia – add wording to reference the removal of redundant or damaging structures.	Environment Agency (19283937)	The Council considers that as flow restoration includes a variety of possible measures, including removing redundant or damaging structures it is not necessary to specify one measure above others, or



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
			use terminology that could be difficult to define in practice.
Policy wording	Criterion Id – add reference to hard landscaping and car parks	Environment Agency (19283937)	Agree for clarity it would be beneficial to amend the wording to criterion Id and a Main Modification is proposed for consideration by the Local Plan Inspector.
Policy wording	Criterion If – add reference to appropriate schemes for the removal of barriers and culverts.	Environment Agency (19283937)	The Council considers that opportunities for flow and function restoration (including removing redundant structures) is already appropriately covered in the scope of criterion Ia and Ie.
Policy wording	Criterion Ig – add reference to restoration of river beds, in addition to the existing reference to restoration of river banks.	Environment Agency (19283937)	The Council considers the current Policy wording is proportionate and appropriate.



Table 46: Policy E8 Landscape Character

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Surrey Landscape Character Assessment, 2015	Note that this may be updated by Surrey County Council and the Policy wording should reflect this.	Surrey County Council (19304577)	As set out in the agreed Statement of Common Ground Update with Surrey County Council, the Council agrees that further clarification would be beneficial, and an additional (minor) modification is proposed to Criterion 2b to also reference any future updates to the Assessment.
Surrey Landscape Character Assessment, 2015	Note that this is now somewhat dated and lacks recommendable cross referencing to National Character Areas, Biodiversity Opportunity Areas, or the emerging LNRS/Environment Act 2021.	Surrey Wildlife Trust (20013025)	Noted. The proposed additional (minor) modification above would ensure that any updated Assessments are taken into account.



Table 47: Policy GBC I Development of New Buildings in the Green Belt

Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary Response
Infilling	Support for protections and preservations for the Green Belt in line with national policy, however, approach to limited infilling is subjective and should be revised to restrict infilling that results in there being no view of the open countryside due to harm of the previous open character of the area as seen from the road outside the proposed infilling.	West End Village Society (19291073)	Any limited infilling may have some impact upon views of open countryside. As such it is not appropriate to include criterion to restrict infilling that results in there being no views of the open countryside.
Unacceptable impact on sites retained in the Green Belt	A number of respondents suggested that the Plan was not sound because it is not positively prepared, not justified and not consistent with national policy for the following reasons: <ul style="list-style-type: none"> Strategic Employment Sites should not be retained in the Green Belt; this would result in conflict with the ambitions of other policies. There are 	ADP Fair Oaks (55800481); Vistry Group (55796577); Lavignac Securities (55781537)	There is a sufficient supply of land to meet identified needs for employment in the form of permissions granted and identified intensification opportunities within designated employment sites without recourse to Green Belt release. As such it is not considered that this constitutes an exceptional circumstance warranting Green Belt release. The capacity of sites in the Council's housing land supply has been adjusted where sites are retained in the Green Belt.



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary Response
	<p>exceptional circumstances to warrant the removal of Fair Oaks and Chobham Business Park which should be removed from the Green Belt.</p> <ul style="list-style-type: none"> Major development sites should be removed from the Green Belt to make use of PDL. The Policy will prevent delivery of sites included in the Council's housing land supply and will impact upon appropriate forms of development in the Green Belt. 		Retention of housing and employment sites within the Green Belt would not preclude appropriate development; accordingly, the approach does not conflict with other relevant policies.
Consistency with NPPF 2023	<p>A number of respondents raised concerns with respect to the consistency of the Policy with the NPPF 2023. Respondent's comments relating to this include:</p> <ul style="list-style-type: none"> The Policy is not consistent with national policy as the criteria are more onerous than that in NPPF 	Lavignac Securities (55781537); Vistry Group (55796577)	The Policy provides detail in respect of how guidance in the NPPF 2023 should be interpreted and as such adds effectively and appropriately to national planning policy.



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary Response
	<p>Paragraph 154, particularly with respect to openness.</p> <ul style="list-style-type: none"> The Policy should be deleted as it does not add to national planning policy. 		
<p>Green Belt and NPPF 2024 consultation</p>	<p>In relation to the NPPF consultation published in July 2024, a number of respondents suggested that the Plan was not sound because it is not positively prepared, not justified and not consistent with national policy. Respondent's comments relating to this include:</p> <ul style="list-style-type: none"> Policy is consistent with the current NPPF however proposed reforms to the NPPF are a material consideration. The approach to the development of PDL and infill sites is expected to change. 	<p>Kingsbury Investment and Development Group (55784929); Knowles Property Group (55796353); Rumsby Investments Ltd (55796385); UCB (39605953); Vistry Group (55796577)</p>	<p>The Local Plan is Submitted in accordance with the current NPPF (2023). Subject to the publication date of the new NPPF the Local Plan will alternatively or also be Submitted in line with the proposed transitional arrangements set out in the consultation document which is for publication of the NPPF plus one month for Submission and Examination under NPPF 2023. Accordingly, the Plan is prepared in line with the policy imperatives of the NPPF 2023 and the points raised are not consistent with the Council's approach of progressing in line with the proposed transitional arrangements.</p>



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary Response
	<ul style="list-style-type: none"> • The Policy does not reflect the direction of travel of Green Belt policy. • Future decision making should not be compromised by inconsistent or more restrictive Local Plan policies. • Making the policy consistent with the new NPPF would be justified. It should be ensured that the Policy wording aligns with the proposed reforms to the NPPF, including the introduction of the grey belt' definition. • The central campus of Erl Wood Manor would constitute Grey Belt land. • Objection is raised due to the consultation NPPF and the Government's proposals for 'Grey Belt'. Proposals for Grey Belt should be recognised and is 		



Topic	Main Issue	Respondent (ID Number)	Surrey Heath Summary Response
	a material consideration for the examination.		



Table 48: Policy GBC2 Development of Existing Buildings Within the Green Belt

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Employment uses in the Green Belt	The Policy is unsound as it is unjustified. It should allow for the redevelopment/regeneration and intensification of defined employment sites in the Green Belt. There should be greater cross-reference between Policy GBC2 and ER2 to enable regeneration/redevelopment of employment uses where they do not cause material harm to openness.	Vistry Group (55796577)	The Policy is aligned with Paragraph 154 of the NPPF 2023. The Policy would not preclude the redevelopment or intensification of defined employment sites within the Green Belt, where appropriate.
Grey Belt	The Policy is unsound as it is unjustified. 'Grey Belt' is now material consideration.	Vistry Group (55796577)	The Local Plan is Submitted in accordance with the current NPPF (2023). Subject to the publication date of the new NPPF the Local Plan will alternatively or also be Submitted in line with the proposed transitional arrangements set out in the consultation document which is for publication of the NPPF plus one month for Submission and Examination under NPPF 2023. Accordingly, the Plan is prepared in line with the policy imperatives of the NPPF 2023 and the points raised are not consistent with the



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
			Council's approach of progressing in line with the proposed transitional arrangements.



Table 49: Policy GBC3 Equestrian Uses in the Green Belt and Countryside beyond the Green Belt

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 50: Policy GBC4 Development within the Countryside beyond the Green Belt

Topic	Main Issue	Respondent (ID Number)	SHBC summary response
Allocated sites in the countryside	The Policy is unsound as it is not clear that the Policy supports the development of countryside sites allocated through HAI/10 to HAI/22, as well as HAI sites specifically benefitting from their own specific Policy (HAI/01 to HAI/09). Relevant sites could be listed in the Policy to improve clarity.	Pond Family (55796193)	Criterion 1c of Policy GBC4 is clear that development of countryside sites allocated through HAI is permissible. It is not considered necessary to re-list relevant sites.



Table 51: Policy GBC5 Gordon's School, West End

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 52: Policy DHI Design Principles

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Policy Support	The Policy is considered sound and the inclusion of policies that support a healthy lifestyle are welcomed.	NHS Property Services (55790337)	Noted.
Additional Criterion	To ensure the Policy is consistent with national policy, an additional criterion should be included to reflect that development should take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.	National Gas (55802337); National Grid (55802433)	The suggested text is already reflected in criterion 2n of Policy DHI.
Criterion 2c	The Policy is considered to be unsound as Criterion 2c could be interpreted to mean all trees within a development should be protected. It should be amended to align with Point 2 of DH5.	Bloor Homes (55790785)	Criterion 2c qualifies that trees/vegetation are expected to be protected where they are worthy of retention. This approach is consistent with Policy DH5.



Table 53: Policy DH2 Making Effective Use of Land

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Policy support	<p>Welcomes Policy, with respondents noting the following:</p> <ul style="list-style-type: none"> • Policy supported; development close to railway stations should consider funding opportunities for improvements in facilities, accessibility, public realm and capacities. • Proposed density of 40dph at Mytchett is appropriate. Site HAI/22 can comfortably accommodate 16 dwellings at this density. • Support minimum densities for allocated sites and non-allocated sites in Windlesham. • Fair Oaks would make effective use of land and delivers at an appropriate density. 	<p>Network Rail (55788833); Pond Family (55796193); SCWW3 Limited (55659233); Vistry Group (55796577)</p>	Noted.
Approach to	The Policy is unsound. Whilst the efficient	Bloor Homes	Part 3 of the Policy provides flexibility to deviate



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
densities unsound	use of land and minimum densities for allocated sites is welcomed, part 3 should be revised to have densities as a starting point, subject to local characteristics and scheme details, so as to not be onerous for small and medium sites.	(55790785)	from the stated densities where appropriate, without being onerous to small and medium sized sites.



Table 54: Policy DH3 Residential Space Standards

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Evidence of need	Evidence could not be found that shows that nationally described space standards are required in Surrey Heath. NPPF footnote 52 states that these standards can be used where a need can be justified. The PPG requires evidence of need, and impact of standards on viability and affordability of new homes.	Home Builders Federation (20211169)	The justification for the application of nationally described space standards is set out in the Space Standards Topic Paper (2024), which was published alongside the R.19 Pre-Submission Local Plan. The Surrey Heath Local Plan Viability Assessment (2024) provides evidence that the approach is achievable.



Table 55: Policy DH4 Sustainable Water Use

Topic	Main Issue	Respondent (ID Number)	SHBC response
Policy support	Welcome Policy in helping to deliver action on climate change in Surrey Heaths.	The Royal Borough of Windsor and Maidenhead (19304673)	Support noted.



Table 56: Policy DH5 Trees and Landscaping

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Policy Support	Paragraphs 8.37 and 8.39 are supported and agree with the emphasis on developer-Council cooperation set out at Paragraph 8.40.	West End Village Society (19291073)	Noted.
Pre-emptive felling of trees	Concern raised in respect of pre-emptive felling. Earlier assessment of trees, including on likely development sites, should be undertaken with TPOs awarded where applicable. The Council should take account of any pre-emptively felled trees in development management processes, using this as a negative factor against considering the application.	West End Village Society (19291073)	Pre-emptive felling of trees is addressed at Paragraph 8.45 of the Local Plan and reflects that regard will be had to any pre-emptive felling in the planning application process. Designation of TPO's falls outside of the Local Plan process.



Table 57: Policy DH6 Shopfronts, signage and advertisements

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	No representations received.		



Table 58: Policy DH7 Heritage Assets

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Policy Support	<p>Comments in respect of support for the Policy:</p> <ul style="list-style-type: none"> The inclusion of policies for the historic environment are welcomed and the tests of soundness in respect of elements that relate to the historic environment have been met. Approach welcomed and provides clarity, however amendments suggested to supporting text for clarity and consistency. Welcome designation of land at Fairfield Lane as an Area of High Archaeological Potential (AHAP) and endorse Para 8.57 for research and excavations where necessary in AHAP before development. Support, however noted that SHBC's Draft Heritage List 	<p>Historic England (19285601); Surrey County Council (19304577); West End Village Society (19291073); Vistry Group (55796577)</p>	<p>Support noted. Agree that further clarification would be beneficial. A Main Modification to Paragraph 8.62 bullet point I, to state: "Conservation Areas, listed buildings and non-designated heritage assets across the Borough..." is proposed for consideration by the Local Plan Inspector. Other comments are noted and necessary typographic changes will be made as additional (minor) modifications.</p> <p>Designation of Areas of High Archaeological Potential and Locally Listed Buildings fall outside of the Local Plan process.</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	consultation (2024) proposed to locally list buildings at Fair Oaks – these are not appropriate for local listing.		



Table 59: Policy DH8 Building Emission Standards

Topic	Main Issue	Respondent (ID Number)	SHBC Response
Policy support	<p>Welcomes Policy, with specific respondents noting the following:</p> <ul style="list-style-type: none"> Aligns strongly with Surrey's countywide net zero planning programme, but request reference added to Surrey Viability Toolkit due to be published imminently. Welcome Policy in helping to deliver action on climate change. Welcome support for smaller scale on-site infrastructure improvements. 	<p>Surrey County Council (19304577); The Royal Borough of Windsor and Maidenhead (19304673); UCB (39605953)</p>	<p>As set out in the agreed Statement of Common Ground update with Surrey County Council, reference in supporting text to Surrey Viability Toolkit is proposed as a Main Modification for consideration by the Local Plan Inspector.</p>
Part I of Policy wording	<p>Questions if Part I of the Policy is justified. Reasons for this included:</p> <ul style="list-style-type: none"> Unnecessary and not effective because part I would be achieved by implementation of the Future Homes Standard, Building Regulations and grid decarbonisation. 	<p>Home Builders Federation (20211169); Persimmon Homes Thames Valley (39477697); Somerton</p>	<p>Part I of the Policy sets the guiding principles of the Policy. There is no restriction on Local Plans going beyond national requirements relating to low/zero carbon design. A Main Modification to include reference to the Surrey Viability Toolkit in supporting text is proposed for consideration by the Local Plan Inspector. This provides detailed guidance on the delivery of low/zero carbon</p>



Topic	Main Issue	Respondent (ID Number)	SHBC Response
	<ul style="list-style-type: none"><li data-bbox="577 292 1077 411">• No testing has been undertaken by the Council on the impact of going beyond the future homes standard.	Development Projects (39484257)	development.



Table 60: Evidence Base

Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Habitat Regulation Assessment - support	Welcome the findings of the HRA/sufficient SANG capacity for the Plan period.	Royal Borough of Windsor and Maidenhead (19304673)	Noted.
Habitat Regulation Assessment – SANG Capacity	Recognise the collaborative work that has taken place to secure sufficient SANG capacity. Seek clarification whether C2 developments sites have been factored in to SANG capacity calculations but notes that even if not, there would still be sufficient capacity.	Natural England (42033025)	As set out in the agreed Statement of Common Ground Update with Natural England, the SANG capacity calculations include detailed consideration of relevant C2 developments.
Habitat Regulation Assessment – Recreational Disturbance	Support the conclusion that there will be no adverse effects on the integrity of the TBHSPA as sufficient SANG capacity has been identified subject to agreements with neighbouring local authorities and bringing forward St Catherine’s Road as a SANG.	Natural England (42033025)	Due to the additional capacity from St Catherine’s Road SANG additional SANG capacity from Shepherds Meadow, Bracknell Forest, is no longer being sought.
Habitat Regulation Assessment – Air Quality	Agree that there will be no adverse effects on integrity of statutory designated sites due to air quality.	Natural England (42033025)	Noted.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
Strategic Highways Assessment - support	Welcomes the findings of the SHAR and of air quality and traffic modelling work and welcome continued discussions on strategic transport and infrastructure matters.	Royal Borough of Windsor and Maidenhead (19304673)	Noted.
Strategic Highway Assessment	Notes the significant work that has been done and the agreed Statement of Common Ground. Notes that although the IDP mentions schemes on the M3, National Highways has no current committed schemes or proposals but as set out in the SHAR, no M3 schemes are relied upon to make the Local Plan sound.	National Highways (55788545)	Noted.
Infrastructure Delivery Plan	Appreciate the inclusion of Network Rail's updates in the IDP noting they remain relevant.	Network Rail (5578833)	Noted.
Various	Appendices submitted supporting representations promoting the allocation of Fair Oaks as a Garden Village raise issues with a number of evidence base documents including:	Vistry Group (55796577)	The Council considers that the evidence base on these matters is robust and that there is no justification for the inclusion of Fair Oaks as a site allocation.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	<ul style="list-style-type: none"> • The SHAR follows a predict and provide approach contrary to the emerging NPPF and should be revised and consider that the base date of the SINTRAM model is out of date. • SA needs revising as a more holistic view to assessing the transportation credentials of a site should be taken. • Development at Fair Oaks will help to deliver the ambitions of the LCWIP. • Employment evidence – unrealistic to rely solely on redevelopment/repurposing of existing employment sites. Critical of the reliance on vacant premises as part of the supply and the Plan does not address the immediate shortage of employment land. 		



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	<ul style="list-style-type: none"> Green Belt Exceptional Circumstances Topic Paper - Do not agree that there are no Exceptional Circumstances to release the Fair Oaks site from the Green Belt. Reasons include a shortfall in housing supply, inability of neighbouring authorities to meet any future unmet needs, a significant need for affordable housing and for Gypsy and Traveller accommodation, employment need, and the constrained nature of the Borough. Case Law and Local Plan Inspectors Report are quoted to support this view. 		
Green Belt Review	A number of representations raised concerns that the approach taken in the Green Belt Review was not robust and queried the consistency and accuracy of assessments made of sites in the Green	Knowles Property Group (55796353); Lavignac Securities	The Council considers that the methodology set out in the Green Belt Review (2022) and Addendum (2023) was robust and enabled a consistent approach to be taken in the assessment of land parcels assessed within the study.



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	Belt.	(55781537); Rumsby Investments Ltd (55796385); Persimmon Thames Valley (39477697); Somerton Development Projects (39484257); Retirement Villages Group (55658945); Vistry Group (55796577)	
Chobham Village Green Belt Boundaries Study	Comments raised in respect of the Chobham Village Green Belt Boundaries Study raised the following points:	Philip Marsden (55785057); Chobham Parish Council	The Council considers that the methodology set out in the Chobham Village Green Belt Boundaries Study and Addendum (2022) was robust and has resulted in the definition of an appropriate



Topic	Main Issue	Respondent (ID Number)	SHBC Summary Response
	<ul style="list-style-type: none"> • Conclusions are contested – function of parcels to the south should be re-defined and built components of Parcel 'A' at Broadford should be included in the settlement boundary. • Removal of Chobham from the Green Belt is not legally compliant or sound. The process did not take account of guidance contained in the SCI. 	(19899073)	settlement/Green Belt boundary for Chobham. It is not considered that the approach taken to the inseting of Chobham in the Local Plan is inconsistent with the SCI. Comments were sought on proposals at Regulation 18 stage and amendments were made to the proposed boundaries taking account feedback from the community.



Table 61: Sustainability Appraisal

Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	<p>Some respondents suggest the Sustainability Appraisal is not considered legally compliant because it fails to effectively consider reasonable alternatives.</p> <p>The Sustainability Appraisal is not considered sound for the following reasons highlighted by respondents:</p> <ul style="list-style-type: none"> • Does not consider higher growth options which address uncapped housing need, emerging higher growth standard method, affordable housing needs or Green Belt release. • Fails to consider the drafted Plan delivering a constrained housing target. • To be capable of Examination in Public, should be updated to test the implications of the NPPF consultation 2024. 	<p>Lavignac Securities (55781537); Knowles Property Group (55796353); Rumsby Investments Ltd (55796385); Philip Marsden (55785057); Somerton Development Projects (39484257)</p>	<p>The Council is required to identify an appropriate strategy. The Sustainability Appraisal sets out and assesses reasonable alternatives to inform an appropriate strategy. The appropriate strategy selected is a matter of planning judgement, and the Council has identified appropriate and justified reasonable alternatives that have been effectively assessed through the Sustainability Appraisal process.</p> <p>The Sustainability Appraisal explored in detail strategic factors with a bearing on the definition of reasonable growth scenarios. This included a focus on the quantum of development, including consideration for higher growth options, and the broad distribution of development.</p> <p>The methodology for assessing sites is clearly outlined in the document. The assessment of sites in the Sustainability Appraisal is a matter of</p>



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	<ul style="list-style-type: none"> Contains errors in review of smaller Green Belt sites. Scope of reasonable alternatives for Chobham are inadequate. 		<p>planning judgement.</p> <p>As set out in earlier responses, the Local Plan is Submitted in accordance with the current NPPF (2023). Subject to the publication date of the new NPPF the Local Plan will alternatively be Submitted in line with the proposed transitional arrangements set out in the consultation document, which allows for any plan submitted for examination prior to publication of the NPPF plus one month, to be examined under the NPPF 2023.</p>
Site assessments	<p>Suggestion that the following sites were not assessed correctly and should be amended:</p> <ul style="list-style-type: none"> Broadford, Castle Grove Road, Chobham (SLAA ID 548). Fairoaks Airport, Chertsey Road, Chobham (SLAA ID 890). Land at Grove End, Bagshot (SLAA ID 736). Land South of Fenns Lane (SLAA ID 153). 	<p>Philip Marsden (55785057); Vistry Group (55796577); Somerton Development Projects (39484257); Knowles Property Group (55796353);</p>	<p>The methodology for assessing sites is clearly outlined in the document. The assessment of sites in the Sustainability Appraisal is a matter of planning judgement.</p>



Topic	Main Issue	Respondent (ID Number)	SHBC summary response
	<ul style="list-style-type: none"> • Land South of Broadley Green (SLAA ID 915). • Land East of Snows Ride (SLAA ID 809). • Land East of Snows Ride (SLAA ID 276) – up to 100 dwellings. • Land at Clews Lane (SLAA ID 740) and Land South of Church Lane, Bisley (SLAA ID 903). 	Lavignac Securities (55781537); Retirement Villages Group (55658945); Rumsby Investments Ltd (55796385)	

