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Royal Borough  
of Windsor &  
Maidenhead

Planning Policy and Conservation,  
Surrey Heath Borough Council,  
Surrey Heath House, Knoll Road,  
Camberley  
Surrey  
GU15 3HD

20 September 2024

Dear Planning Policy Team

### **Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19) Consultation response**

Thank you for consulting the Royal Borough of Windsor and Maidenhead (RBWM) on the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19) document and accompanying documents.

In general, we welcome the approach of the Pre-Submission Local Plan, and the intention of the spatial strategy to focus new development within the settlement areas to the West of the borough and to optimise delivery in the most sustainable and accessible areas of Surrey Heath.

#### Housing

During the previous Regulation 18 Consultation, we noted that Surrey Heath could demonstrate a 7.20 years' housing supply.

We are pleased to see that paragraph 4.77 of the Regulation 19 Housing Topic Paper confirms that the current housing land supply position is 7.24 years, with paragraph 4.78 confirming that the Surrey Heath will be able to support a Five-Year Housing Land Supply figure up to 31<sup>st</sup> March 2029.

We welcome the continued intention confirmed in paragraph 3.6 of the Regulation 19 Housing Topic Paper, of Surrey Heath and its Housing Market Area (HMA) partners to work together to ensure that any shortfall in housing will be addressed within the HMA.

#### Green Belt

Paragraph 2.17 of the Regulation 18 Draft Surrey Heath Local Plan stated that the Council could meet its housing needs from sources other than the Green Belt, and that as a result, the Council concluded that there were no exceptional circumstances to warrant the release of land from the Green Belt to accommodate new homes.

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However, we note that Paragraph 4.2 of the Green Belt Exceptional Circumstances Topic Paper which accompanies the Regulation 19 version of the Local Plan does propose amendments to the Green Belt boundary in the following circumstances:

- The release of land to help meet identified needs for Gypsy and Traveller accommodation needs;
- The inseting of Chobham Village within the Green Belt; and
- The release of land to provide a defensible boundary at Longcross Garden Village.

At Regulation 18 stage we welcomed the preservation of the Strategic Area Green Belt buffer between the two boroughs, as this plays an important role in preserving openness and stopping urban sprawl. The above suggested amendments to the Green Belt boundary with Surrey Heath would not seem to have a detrimental impact on the Strategic Area Green Belt buffer, so RBWM have no objection to the amendments proposed at this stage.

### Transport

During the Regulation 18 Consultation, we supported the intention of the Draft Local Plan to provide a comprehensive package of infrastructure to incentivise sustainable behaviours and travel choices. The proposed allocation sites are mostly located some distance from the boundary with RBWM and therefore are not likely to have significant impacts on the Royal Borough in terms of traffic and infrastructure. However, we noted that there are a handful of sites, notably, HA1/02, HA1/12 and HA1/13, that could increase pressure on the local road network, including the B383, B3020, A30 and A332 which travel towards and through the Royal Borough. The A30 in particular suffers already from peak time congestion.

We previously noted that the Transport Assessment accompanying this Regulation 18 stage was carried out in 2010 (dated 2016 on your website) and stated that further measures may be required in parts of the borough (paragraph 6.2.9). We also noted that this TA would be updated for the next stage of the Local Plan, which we welcomed.

We now note that further work has been undertaken by Surrey Heath to support the Regulation 19 version of the Plan. Paragraph 8.1.2 of the Surrey Heath Local Plan Strategic Highway Assessment Report 2024 states that the impacts tend to be local to the developments and the cumulative impact is in general tolerable, which, as per Consultation Statement Appendix 4, demonstrates there is unlikely to be any significant impacts on the road network arising from the proposed site allocations.


RBWM welcomes those findings and would welcome continued engagement regarding strategic transport and infrastructure issues, in addition to ongoing discussions across the surrounding area.

### Natural Environment

Paragraph 3.6.1 of the Surrey Heath SANG Study (January 2020) made it clear that SANG capacity in the west of the Borough is becoming very limited, and that this was the area of the borough where providing new SANG is most challenging.

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With reference to the Thames Basins Heath Special Protection Area, we previously welcomed the assertion in paragraph 6.11 of the HRA (Feb 2022) that additional work to identify new SANGs was ongoing.

Now, paragraphs 3.12, 3.13 and 3.14 of the Regulation 19 Thames Basin Heath Topic Paper confirm that three key sources of SANG capacity been identified to meet the needs for development up to 2038. RBWM welcomes the confirmation that SANG capacity has been secured in Surrey Heath for the plan period.

We also previously noted that traffic and air quality modelling had still not been completed. Paragraph 6.25 of the HRA concludes that as these data sets are not yet available adverse effects on the integrity of European sites cannot be excluded. We therefore welcome the further information provided on this in the Regulation 19 Habitat Regulation Assessment. We welcome the findings of the HRA which confirm that likely significant effects of the SHLP on the Windsor Forest and Great Park SAC regarding atmospheric pollution can be excluded, both alone and in-combination. RBWM also welcomes the findings noted in paragraph 7.4 of the HRA that conclude that there will be no adverse effects of the SHLP on the Thames Basin Heaths SPD with regards to recreational pressure. We also welcome the confirmation in paragraph 7.7 of the HRA that the SHLP will not interfere with the ability of Thames Basin Heaths SPA to achieve its Conservation Objective air quality targets and that there will be no adverse effects of the Surrey Heath Local Plan on the Thames Basin Heaths SPA regarding atmospheric pollution, both alone and in-combination.

We note, and support Policy E1 in the Regulation 19 version SHLP seeking to ensure that any proposed development scheme will not adversely affect the integrity of the SPA, and that all new residential developments will need to provide or contribute toward the provision of SANG.

### Climate change




RBWM strongly supports the intentions of the Council to tackle climate change. We welcome policies DH4 (Sustainable Water Use), DH8 (Building Emission Standards), SS3a (Climate Change Mitigation), SS3b (Climate Change Adaptation) and E5 (Renewable and Low Carbon Energy and Heating Systems), all of which help in delivering action on climate change and reduction in Surrey Heath's carbon emissions and supporting the transition to net zero. In particular, we welcome the requirement in SS3a that all major applications should deliver net zero carbon development unless not feasible or viable, with any shortfall addressed via off site measures or a carbon offset payment. This is similar to the approach that RBWM is taking through its recently adopted Sustainability SPD.

### Biodiversity Net Gain

RBWM welcomes the ambition of the Local Plan and the requirement in Policy E3 for development proposals to demonstrate the provision of BNG gains of at least 20%. This higher target is supported by RBWM as it has been shown to be necessary and deliverable in Surrey Heath by the Surrey Nature Partnership report and the Local Plan Viability Assessment.

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## Employment

The analysis in the Employment Land Review (2019) showed a general trend of loss of B1 and B2 floorspace. RBWM welcomes the allocation of sites in the Regulation 19 version of the SHLP to meet the full employment needs of the borough.

We are pleased to hear that Surrey Heath intends to meet their full need for housing and employment. However, we raised concerns during the Regulation 18 Consultation that the proposed development within the Draft SHLP could have detrimental impacts on RBWM in terms of highways infrastructure. We previously also strongly advised that Air Quality and Traffic modelling be carried out, to assess the impact of any development within the Draft SHLP on European sites.

As covered above, this work has now been carried out, and RBWM welcomes the findings of the additional evidence base work that has been done to support the Regulation 19 version of the Plan.




In conclusion, RBWM has no concerns or objections to the Pre-Submission Surrey Heath Local Plan or its evidence base. I look forward to continuing constructive discussions with Surrey Heath under the Duty to Cooperate as your new Local Plan progresses to examination. This response has been approved by RBWM Assistant Director of Planning, Adrien Waite.

Yours sincerely



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Royal Borough Windsor & Maidenhead

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