

Appendix 2

Responses relating to non-site specific questions

General Housing

Question 4e: Do you feel the Council has identified all the possible policy options with regards to housing allocation? If not, please provide details.

Summary of Responses	Council response
<p>Yes. <i>All housing policy options identified.</i></p>	<p>Noted</p>
<p>No. <i>Other housing allocation options suggested:</i></p> <ul style="list-style-type: none"><i>A higher growth option that fully addresses objectively assessed housing need as required by the NPPF.</i><i>Address the housing shortage with greater urgency. The most appropriate option would be for the Council to release large greenfield sites (including land east of Heathpark Drive) in the short-term that are capable of providing SANG.</i><i>A policy option which allows for the early identification and allocation of CBGB sites which deliver SANG provision to serve the Borough. This is the most appropriate way to ensure that the council's housing requirements will be met and that sites within existing settlements can come forward.</i>	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of housing sites.</p>

Summary of Responses	Council response
<ul style="list-style-type: none"> • <i>A flexible policy is required which allows for the uncertainty surrounding SANG provision and the doubts over the ability of the Council to meet its housing targets and therefore implement the Core Strategy.</i> • <i>If the Council continue to under deliver against their housing targets then there would be a strong argument that additional housing sites should be released in order to ensure sufficient supply, choice and competition in the market for land. This would be in accordance with paragraph 47 in the NPPF.</i> • <i>Questionable whether the Council has an excess of sites that are developable as the 'delivery' of SANGs is a significant barrier that needs to be addressed. Considered that the SANGs land will only viably be delivered and maintained in perpetuity if it is delivered as part of strategic housing site allocations. Releasing strategic sites in the eastern part of the borough that can provide their own SANG should be an allocation option.</i> • <i>Option required to enable the Council to meet its 5 year housing land supply requirement.</i> • <i>There is an over-reliance on Princess Royal Barracks (PRB) and Camberley Town Centre in the Site Allocations Issues and Options Paper, together with extant planning permissions and windfalls. Given the severe housing land supply shortage it is essential that the Council actively promotes the allocation of a range of deliverable sites across the borough.</i> • <i>Persisting with only 20 dwellings for West End is not an appropriate strategy in light of the NPPF. It is important that the extant planning policy status of the housing reserve sites has no bearing on how they are assessed for the new Local Plan, and the sites should be assessed from the same base line as all of the other available sites.</i> • <i>Phase forward sites in the CBGB and the housing reserve sites, along with</i> 	

Summary of Responses	Council response
<p><i>windfall sites, existing commitments and sites within the settlement boundaries. This will provide certainty in delivery up to 2028 and ensure that housing need is met in the Borough. As part of this the Council will need to actively pursue the allocation of further SANG to support housing delivery.</i></p> <ul style="list-style-type: none"> • <i>To provide certainty for landowners, residents and the Council and to prevent planning by appeal for the next 5 years, a different option should be devised which seeks to provide an up to date, current 5 year housing land supply.</i> • <i>Review the CS&DMP DPD to identify and allocate sufficient land to meet the full objectively assessed housing needs of the Borough, including the release of land from the Green Belt. this will provide certainty in delivery up to 2028, ensure housing need is met in the Borough and Government policies in the NPPF are complied with.</i> • <i>Strategic housing releases are necessary at an early stage of the plan period having regard to persistent historic under delivery and the Council's failure to demonstrate a 5 year supply.</i> • <i>Disagree that Surrey Heath should not be expected to provide a 20% buffer on top of the 5 year supply requirement. The approach is inconsistent with the requirement of Para 47 of the NPPF.</i> • <i>Sites beyond the Green Belt can only be released if the sequential test imposed by the Core Strategy applies. Core Strategy polices will not be regarded as up to date while the 5 year land supply cannot be met. It is probable therefore that the Council will be met by a large number of unallocated sites as the market responds to this and tries to backfill the hole that has been left in the 5 year land supply. Rather than relying on a sequential approach the Council should identify criteria by which the relative sustainability of different sites can be evaluated wherever they may be located, to provide flexibility and fairness, and to enable the 5 year housing land supply to be met.</i> 	

Summary of Responses	Council response
<ul style="list-style-type: none"> • <i>Use brownfield sites before looking to release countryside and then green belt</i> • <i>No use of Green Belt sites</i> • <i>Infilling in ribbon development on individual basis</i> • <i>No rural exception sites</i> • <i>Rural exception sites that only build on footprint of existing structures</i> • <i>Priorities need to be more developed. Which comes first, infrastructure or number of housing units</i> • <i>Do not allocate or permit sites for new housing where areas are already full up</i> • <i>A policy which encourages organic growth (small scale development with supporting infrastructure) rather than imposing large housing estates in village environments</i> • <i>Prevent building of very large single properties which remain vacant, sterilise land and bring no benefit to the community.</i> • <i>Consider using land within Green Belts for housing</i> • <i>Allocation of further open space areas through a green spaces review to facilitate housing delivery</i> • <i>Release no CBGB sites until all existing brown sites have been utilised. Vacant premises should not be left empty to deteriorate.</i> 	

Summary of Responses	Council response
<ul style="list-style-type: none"> • Long term redundant offices and commercial properties should be used for housing 	

Question 4f

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

Summary of Responses	Council response
Option 1 is not the most appropriate option	Noted
Option 1 is the most appropriate option: <ul style="list-style-type: none"> • Best balanced and most productive 	Noted. Information will be taken into account in the selection of the preferred option for allocation of housing sites.
Option 2 is not the most appropriate option	Noted
Option 2 is the most appropriate option	Noted
Option 3 is not the most appropriate option: <ul style="list-style-type: none"> • Whilst this option would facilitate the identification of new SANG it is impracticable to rely on windfall, existing commitments and sites within existing settlements to meet all needs for the following reasons: <ul style="list-style-type: none"> • Supply actually generated from windfall sites uncertain; • Many existing commitments and sites in existing settlements will not come forward • Overly optimistic to believe all housing need from within existing settlement areas. Reliance on existing SANG should not feature in future policy as there is not enough capacity to ensure housing delivery. A solution must be developed which tackles this issue head on. <ul style="list-style-type: none"> • Option 3 refers to pursuing additional SANG, but makes no reference to the allocation of residential sites in the CBGB that can deliver it 	Noted. Information will be taken into account in the selection of the preferred option for allocation of housing sites.
Option 3 is the most appropriate option:	Noted.

Summary of Responses	Council response
<ul style="list-style-type: none"> • Delivers Core Strategy policies and have a strong emphasis on actively pursuing new SANG • Very likely to deliver the housing target, with only a low or medium risk of needing to call on further land for development to meet targets. At the same time, they do not prescribe house-building which may prove surplus to housing targets. • Would deliver sufficient housing numbers to 2025 • Most realistic up to 2025 with slightly less surety between 2026 – 2028 and does not rely on releasing sites in Countryside Beyond the Green Belt • Will keep settlement boundaries and not create urban sprawl • Achieves targets with low to medium risk. This seems a balanced approach with potential for a later review (in 2025) to assess if the needs are still appropriate at that time. 	<p>Information will be taken into account in the selection of the preferred option for allocation of housing sites.</p>
<p>Option 4 is not the most appropriate option:</p> <ul style="list-style-type: none"> • Whilst this policy acknowledges need for CBGB sites to be used for housing, believe very special circumstances exist to justify release of green belt land. • Option 4 is correct in recognising that additional SANG need to be identified, but it is wrong to suggest that this only needs to happen after 2026. 	
<p>Option 4 is the most appropriate option:</p> <ul style="list-style-type: none"> • Very likely to deliver the housing target, with only a low or medium risk of needing to call on further land for development to meet targets. At the same time, they do not prescribe house-building which may prove surplus to housing 	

Summary of Responses	Council response
<p>targets.</p> <ul style="list-style-type: none"> Option 4 is the correct approach because it not only seeks to meet identified need over and above that in CP3 of the Core Strategy, but it also provides a greater certainty for those responsible for housing provision, i.e. the development industry and others, especially those involved in the provision of social housing. 	
<p>Option 5 is the most appropriate option:</p> <ul style="list-style-type: none"> Will prevent policies within the plan from becoming out of date; however, reliance on sites within settlements is not supported. Housing needs met within settlement 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of housing sites.</p>
<p>Option 6 is the most appropriate option:</p> <ul style="list-style-type: none"> An early review is supported but this should not be a stand-alone option, as it does not include what approach will be taken to housing supply and meeting demand. Need to wait until PRB is built out and fully occupied to assess impact. The need to monitor progress on the PRB Deepcut site on an annual basis is surely essential to allow prompt action to be taken to bring forward sites to address any potential housing shortfall. Unless further SANGS are immediately identified and provided there is a strong probability that housing development in Surrey Heath will virtually cease until such time as this problem is resolved. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of housing sites.</p>
<p>None of the policies are appropriate:</p> <ul style="list-style-type: none"> All options take the approach of providing housing later in the plan period. They are not appropriate as they conflict with national policy and its drive for the delivery of housing where there is a clear need. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of housing sites.</p>

Summary of Responses	Council response
<ul style="list-style-type: none"> • None of the policy options identified are appropriate because none will achieve a 5 year land supply. The options are most concerned with dealing with a potential shortfall in the period 2026-2028, but ignore the conformed shortfall in years 1 to 5. • To argue that the CS does not allow the 5 year target to be met will not provide a justification on appeal, as paragraph 49 of the NPPF makes clear that policies are not to be regarded as being up to date. The NPPF was published after the CS was adopted, and thus the CS does not take account of it in its final form. • None of identified policy options are considered to properly address the housing requirements of the Borough. There is an urgent need for SANG and the policy options need to include allocations to ensure this is achieved. • The policy options are not considered to offer a realistic solution to the provision of housing across the Borough, because they do not enable the allocation of CBGB sites until 2026. Without such allocation, the provision of sufficient SANG to support the rest of the Council’s housing requirement would appear unlikely. Whilst it is understood that the Council have made attempts to introduce the necessary provision of SANG, separate from residential allocations, this has not proved successful. The most likely way of ensuring that SANG is provided on a scale, in a location, and within a timeframe, that would enable the proper provision of housing across the rest of the Borough, is to allocate site(s) within the CBGB that can ensure the swift delivery of SANG. It is therefore considered unrealistic and irresponsible to progress with a policy option that prevents the most likely way of addressing the Council’s current significant housing supply deficit from occurring. • To argue that the CS does not allow the 5 year target to be met will not provide a justification on appeal. Paragraph 49 of the NPPF makes clear that policies are not to be regarded as being up to date. The NPPF was published after the CS was adopted, and thus the CS does not take account of it in its final form. 	

Summary of Responses	Council response
<ul style="list-style-type: none"> • The CS is already out of date. An early review is required which should be undertaken before the Site Allocations DPD is published. In order to accommodate more housing, Green Belt boundaries need to be reviewed. More SANG is also needed in order to release more land for housing. • The NPPF advocates (in paras. 47, 50, 157) allocating a range of sites which are able to meet the identified development needs and deliver the spatial strategy. This creates flexibility in the supply, a requirement which is considered crucial in national policy for plan-making and a key component of planning for sustainable development (NPPF paras. 14, 157). An inherent characteristic of the housing market is that each development site is unique in its constraints and timescales for coming forward. This is recognised within the NPPF in para. 47 which establishes the requirement for LPA’s to identify a minimum 5% buffer of housing land supply against the five year requirement in order to “ensure choice and competition in the market for land”. <p>It is inappropriate for the Council to rely heavily on one strategic site, a town centre site and unidentified windfalls to deliver its housing strategy. In our view it is essential that, in particular given the knowledge of a severe housing land supply shortfall, the Council proactively promotes the allocation of a range of deliverable sites across the borough. Table 4.4 of the CS&DMP DPD sets out a possible distribution pattern for new housing in the period up to 2025. However only 20 dwellings are suggested for West End. We consider that, persisting with this low number, would not be an appropriate strategy, in the light of the NPPF.</p> <ul style="list-style-type: none"> • None of the Options will result in a sound DPD, for the following reasons: <ul style="list-style-type: none"> • Justified - The DPD would fail to provide the most appropriate strategy for delivering defined housing needs; • Effective- The DPD would fail to offer a flexible housing delivery strategy or 	

Summary of Responses	Council response
<p>deliver defined strategic housing needs;</p> <ul style="list-style-type: none"> Consistent with national policy- The DPD would fail to 'boost significantly the supply of housing' as required by paragraph 47 of the NPPF. 	

Question 4g

If the Council is required to release sites within Countryside Beyond the Green Belt which of the sites identified in Appendix 4 do you feel the Council should focus on? Please explain your reasoning.

Summary of Responses	Council response
None. Development in existing settlement areas should be sufficient to cover the targets.	Noted
Deepcut	Noted
Land east of Windlesham	Noted
H/DPC/12 Pine Ridge Golf course	Noted
Previously developed land with reasonable road access	Noted
Should not consider releasing any areas of countryside beyond the green belt until all existing brown sites have been used up. Vacant premises should not be left empty to deteriorate	Noted
Western side of Borough. Eastern side has already taken its fair share.	Noted
Not Mytchett due to fact of flooding problems and sewage capacity	Noted
Areas that are not woodland	Noted
Sites beyond the Green Belt can only be released if the sequential test imposed by the Core Strategy applies. Core Strategy polices will not be regarded as up to date while the 5 year land supply cannot be met. It is probable therefore that the Council will be met by a large number of unallocated sites as the market responds to this and tries to backfill the hole that has been left in the 5 year land supply. Rather than relying on a sequential approach the Council should identify criteria by which the relative sustainability of different sites can be evaluated wherever they may be located, to provide flexibility and fairness, and to enable the 5 year housing land	Noted

Summary of Responses	Council response
supply to be met.	
Ref H/BAG/3,35 & 37 These sites can probably be developed within a short period as an extension to an existing housing site if an appropriate SANGS site can be found.	Noted
H/WE/24	Noted
Inappropriate for CBGB sites in Deepcut,, Mytchett or Frimley to be released	Noted
Cheswycks School, Deepcut	Noted

Question 4h

If the Council is required to release sites within Countryside Beyond the Green Belt which of the broad search areas identified in Appendix 5 do you feel the Council should focus on? Please explain your reasoning.

Summary of Responses	Council response
None	Noted
Brownfield sites	Noted
None in Chobham as there is a sufficient settlement site (Rugby club) to provide housing numbers	Noted
Deepcut	Noted
Deepcut/Western Urban Area - Southern Broad Area. This site includes Site H/DPC/5 referred to in Question 4c above. Further residential development within this Broad Area would improve the approaches and environment of the newly enlarged village of Deepcut. The vacant site of the old Cheswycks School on the Guildford Road would benefit from housing development.	Noted
Avoid Deepcut as further housing development would destroy the character of the area and turn it into a massive housing estate.	Noted
Pine Ridge Golf Course, Old Bisley Road as it a golf course and not woodland or heathland.	Noted
The southern search area in Blackwater should be investigated as the existing "mobile" home sites and incremental provision of small scale industry on old farmsteads is already detrimental to the Blackwater Valley. Any scheme should	Noted

Summary of Responses	Council response
take holistic approach and aim to improve landscape and countryside access, perhaps through SANG provision	
Avoid Blackwater Valley as it is an important wildlife corridor with mature woods and lowland heath	Noted
Areas south of West End, Bagshot Camberley	Noted
West End snugly fits against current housing, roads are just about adequate and space is enough to do the job without overcrowding.	Noted
Land east of Windlesham (including land to south of woodlands Lane)	Noted
The Broad Search Area titled 'Deepcut / Western Urban Area' is considered most appropriate, in particular the area to the north. The majority of other Broad Areas identified adjoin much smaller settlements, resulting in less sustainable development opportunities.	Noted
Not all of the search areas in Appendix 5 are "beyond the Green Belt". The Council should focus on areas outside the Green Belt as a priority in order to protect the Green Belt and adhere to National Planning Policy.	Noted
<p>I would start by saying how many houses do we already have in each district/village eg Bagshot, Windelsham etc then assume that there will be so many children from each village that will require houses in the future. This will tell you how many house you have to build in each Village plus of course an equal % more for the government imposed housing plan. Surly this is a more practical and farer system than trying to bunch all the proposed housing into blighting one village or district whilst leaving others with no housing for local people</p> <p>Appendix 5 does not indicate broad search areas. The areas selected are highly specific, all adjoin settlements, and individually are so small, that in effect they are specific sites rather than a broad area. Restricting the search area in this way will be extremely inflexible and act to choke off potential housing supply.</p>	Noted
South of Bagshot. This area can probably be developed within a short period as an extension to an existing housing site if an appropriate SANGS site can be found.	Noted
Land between Frimley Green and Mytchett should also be identified as a broad search area as it represents a sustainable location and a suitable location for new housing.	Noted

Summary of Responses	Council response
East and South of Chobham and East of Windlesham/Snows Ride. There is ample capacity for additional housing units in these locations. Increased population will not be to the detriment of existing facilities and infrastructure and will add vitality and viability to the local centres.	Noted
<p><u>Potential biodiversity conservation issues are identified with the following Broad Areas:</u></p> <p>Broad Area East & South of Chobham, where the northern section is adjacent to an SNCI.</p> <p>Broad Area Blackwater Valley, where the southern area appears to overly the Mytchett Mere, Land between Lindsford Farm and Grove Farm SNCI.</p> <p>Broad Area Deepcut/Western urban area, where the southern area overlies Frith Hill SNCI.</p>	Noted
West End is a highly sustainable village with numerous local services and amenities. It is also on a primary road network and well served by bus routes. It should be the focus of the Council's CBGB release.	Noted
All MOD land. Especially in West End (The Ranges).	Noted
Land west of Bisley/Knaphill around the Queens Road areas. Near to military land and undeveloped.	Noted
Nursery land in Chobham along the Bagshot Road behind Landform Consultants Ltd. (next to Chobham Cemetery) as this has a large number of redundant greenhouses / hard standing that could be utilised. This has very good access onto the Bagshot Road and is very close to the school and shops, and most importantly is not in a flood plain.	Noted
An alternative broad area of search should be identified which encompasses the whole of that part of the eastern area of the District that lies beyond the SPA. This should form the broad area of search given the scale of the deficit in the LPA's housing land supply.	Noted
There is a need to consider housing allocation across the Borough, not just in limited areas. Concentrating development to only parts would skew provision and not meet for a wide range of needs, nor provide housing to serve the existing employment	Noted

Summary of Responses	Council response
and population centres across the Borough.	
New housing allocations should be provided by way of extensions to existing settlement areas with appropriate, definable, logical and defensible boundaries established.	Noted
Land east of Mytchett	Noted

Question 4i

Do you believe the Council should be considering other broad search areas? If so, please identify them and explain why you think they should be considered.

Summary of Responses	Council response
Council should not be restricting its search for sites to CBGB area. Should also be looking at Green Belt, such as land to south-west of Chobham.	Noted

Question 4j

Are there any sites that you feel could be allocated as rural exception sites? If so, please identify them and explain why you think they should be considered.

Summary of Responses	Council response
No sites to be allocated as rural exception sites	Noted
Kalima	Noted
All of the 5 sites outside the settlement area in Chobham should be considered for allocation as rural exception sites and for no other purpose	Noted
In West End, H/WE/24, H/WE/18, H/WE/8 add most of area H/WE/22 except that by the road.	Noted
Large derelict fields/green houses at rear of wholesale nursery by Chobham Vicarage, Bagshot Road, across foot path- by cemetery. 10 units possible. Old nursery by Ten Acres, Scotts Grove Road. Appears abandoned/derelict. 15 houses/units possible.	Noted
Chobham Common - Burrow Hill northwards	Noted

Section 5.B – Traveller Housing

General responses on traveller housing

Summary of Responses	Council response
Assessment of 19 pitches is wrong and needs to be re-assessed.	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
Current sites have been adequate to date	Noted
Agree that identification of Traveller sites will be an important role of the SA document.	Noted
The first step should be to identify general principles such as whether sites should be near roads/schools, size etc. this would engage the community in dealing with this issue before getting into emotive arguments around particular sites.	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
Introduce a scheme of community payments who agree to accommodate additional gypsy pitches in their area. These would be tradeable permits which would help to provide more equity in allocation.	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
Criteria set out in Policy DM6 should be strictly followed when allocating sites.	Noted
A call for sites from private landowners to supply pitches will never give the Borough its required capacity. The Council needs to supply land for sites.	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
Concerned that the Inspector's Core strategy decision on the lack of a 5 year supply will be used as an excuse to follow a 'do nothing' strategy with respect to the provision of traveller sites.	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.

Question 4I: Do you feel the Council has identified all the possible policy options with regards to traveller housing allocation? If not, please provide details.

Total No. of responses to this question: 35

Summary of Responses	Council response
Yes, all policy options identified	Noted
<p>No, all policy options not identified. Suggested other options included:</p> <ul style="list-style-type: none"> • Too many travellers sites identified • Should not be policy to build houses – they are travellers • No more traveller sites in Chobham or the eastern areas of the borough. • Land owned by county or borough should be used to provide sites for benefit of whole community and not for financial gain as private land owner • Introduce a scheme of community payments who agree to accommodate additional gypsy pitches in their area. These would be tradeable permits which would help to provide more equity in allocation. • Council to supply sites by: <ul style="list-style-type: none"> • compulsory purchase of suitable land; • utilise under-used parcels of council owned land • Sell off unsuitable under-used parcels of council land and use money to purchase sites • Accommodate traveller sites on large scale allocated sites as part of the affordable provision. Noted this opportunity seems to have been lost on the Princess Royal Barracks development. • Accommodate travellers on allocated sites in Bagshot. • Provide only in urban areas in west of Borough. • Provide in Deepcut – large new area with living and working areas nearby. • Limit growth as much as possible • Accommodate on vacant brownfield sites in countryside areas close to urban settlements • Provide no more sites and prosecute immediately and relentlessly any illegal trespass. 	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of traveller sites.</p>

Question 4m

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

Total no. of responses to this question: 42

Summary of Responses	Council response
None	None
<p>Policy option 1 (Do nothing) is not appropriate. Reasons given:</p> <ul style="list-style-type: none"> • This is the current policy and it represents a failure of the Council in its duty to both the traveller and non-traveller communities. • It leaves the Borough vulnerable to further unplanned unauthorised sites in Green Belt and claims of 'very special circumstances' due to under provision and lack of 5 year supply of sites. Harmful to Green Belt, costly to public purse and gives rise to traveller/local community tensions, prejudice and discrimination. • It leaves travellers suffering unsuitable accommodation and facing uncertain difficulties about where they will be allowed to stay. This has a negative effect on families and children. • Leaves local developers an ability to threaten residents with traveller provision if they do not get their way. • Council's inaction has already resulted in appeals for Traveller sites being allowed. Continuing to follow the 'do nothing' option would show further negligence by the Council as it will lead to sites being imposed. Council should not knowingly carry out a policy which results in inappropriate development in the greenbelt. This could leave the Council open to litigation if it fails to act. • Council will be failing its objective of protecting villages and their green areas. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.</p>
<p>Policy option 1 (Do nothing) is most appropriate. Reasons given:</p> <ul style="list-style-type: none"> • Have enough traveller sites • Limit growth as much as possible 	
<p>Policy option 2 (Allocation of sites across the Borough) is most appropriate. Reasons given:</p> <ul style="list-style-type: none"> • Existing over concentration in Chobham area. More equitable distribution required. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.</p>

Summary of Responses	Council response
<ul style="list-style-type: none"> Further provision should be made in non Green belt areas Wider distribution across borough will assist with social integration. Other new residential development is being steered towards west of borough, urban areas and non green belt areas in accordance with national and local policy. This should also apply to development for traveller sites. 	
<p>Policy option 2 (Allocation of sites across the Borough) is not appropriate. Reasons given:</p> <ul style="list-style-type: none"> Gypsies live in communities. Sites with 2-3 pitches not big enough. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.</p>
<p>Policy option 3 (Expand existing sites) is most appropriate. Reasons given:</p> <ul style="list-style-type: none"> Necessary infrastructure already exists Sites are already accepted by the Traveller and local communities 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.</p>
<p>Policy option 3 (Expand existing sites) is not appropriate. Reasons given:</p> <ul style="list-style-type: none"> Does not accord with Good Practice Guide for Designing Gypsy and Traveller sites which identifies a maximum of 15 pitches on one site. Would result in a greater concentration of numbers in existing areas and goes against principle of diverse society. Sites have limitations Sites are already too big and have community tensions Encroach on Green Belt Local villages of Chobham and West End struggle to cope with existing numbers 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.</p>
<p>Policy option 4 (Provision of large new sites) is appropriate provided it is not a Green Belt site or in Chobham or larger than 15 pitches.</p>	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.</p>
<p>Policy option 4 (Provision of large new sites) is not appropriate. Reasons given:</p> <ul style="list-style-type: none"> Will create isolation and segregation. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.</p>
<p>Combination suggested as most appropriate option:</p> <ul style="list-style-type: none"> Expand existing traveller sites and find 1 new site. 	<p>Noted. Information will be taken into account in the selection of the</p>

Summary of Responses	Council response
	preferred option for allocation of traveller sites.

Section 5.C – Employment

Question 5c: Do you feel the Council has identified all the possible policy options with regards to the various employment allocations? If not, please provide details.

Summary of Responses	Council response
Yes	Noted
No: Identified employment sites will not support the governments growth agenda	Noted
Some of the sites identified for housing may be more suitable for employment	Noted
Surrey Heath has an oversupply of office space. Vacant space (eg Watchmoor Park, small courtyard offices in Yorktown) should be converted /redeveloped for housing.	Noted. Information will be taken into account in the selection of the preferred option for allocation of employment sites.
Channel new inward employment investment to vacant employment sites eg. The Linde group offices (BOC headquarters) on Chertsey road, Windlesham	Noted. Information will be taken into account in the selection of the preferred option for allocation of employment sites.
Identify industrial/office space at Deepcut	Noted
Encouraging employment and enterprise should be given a much higher priority.	Noted
The identified sites lack imagination. Something more credible is needed to support growth and local employment.	Noted
To harness employment creation and economic growth, the Council must consider amending the core employment boundaries to include existing brownfield employment sites like Gregory’s Yard, for while they may not be connected to the principal public transport network they have the capacity for change and regeneration to appeal to businesses seeking property fit for purpose.	Noted. Information will be taken into account in the selection of the preferred option for allocation of employment sites.

Question 5d

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

Core Employment Areas:

Summary of Responses	Council response
<p>Option 1 (Do nothing) is an not appropriate employment option:</p> <ul style="list-style-type: none"> • Many of the existing core employment sites have been developed as standard and are physically constrained with little room for expansion or adaptation. Furthermore, of the Surrey Heath, Hart and Rushmoor districts, Surrey Heath was the only district to experience an overall loss of employment space during the period 1999 – 2009; therefore, the option to make no change to the core employment area boundaries would serve no valid purpose in the core strategy. • Retention of existing employment boundaries would not be effective in achieving employment growth identified in Core Strategy. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of employment sites.</p>
<p>Option 2 (Amend Core Employment Area Boundaries) is most appropriate employment option:</p> <ul style="list-style-type: none"> • Allows for flexibility over time. • Will give diversity of employment uses • Will allow employment creation and economic growth to be harnessed. • 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of employment sites.</p>
<p>Option 3 (Delete Core employment areas) is an not appropriate employment option:</p> <ul style="list-style-type: none"> • Many of the existing core employment sites have been developed as standard and are physically constrained with little room for expansion or adaptation. Furthermore, of the Surrey Heath, Hart and Rushmoor districts, Surrey Heath was the only district to experience an overall loss of employment space during the period 1999 – 2009; therefore, the option to delete the core employment areas would serve no valid purpose in the core strategy. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of employment sites.</p>

Employment Re-vitalisation Areas and Land at Half Moon street, Bagshot Policy Options:

No comments

Section 5.D – Retail

Question 6a: Should the retail centre boundaries outlined in Appendix 7 be amended? Please explain why you think this.

Summary of Responses	Council response
<p>No:</p> <ul style="list-style-type: none"> The retail centre categories in Frimley and Frimley Green (proposed to be changed to Prime Retail) seems like red tape and bureaucracy. The main aim should be to get retailers into the empty shops. Frimley has too many hairdressers, banks and charity shops. It needs more independent shops to help the town thrive again. The premises at 76 Guildford Road, Lightwater are in an established commercial use with a long lease held by the occupying company. This may or may not continue in the long term and we have concerns that there may be difficulties in sustaining commercial use of the site once the present lease has expired. A flexible approach should be applied in this location, which allows for possible redevelopment in the future. Accordingly there is no reason to amend the policy for this area, and 76 Guildford Road should not be included within a revised retail area. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of retail sites.</p>
<p>Yes:</p> <ul style="list-style-type: none"> Many of the changes reflect current retailing activity. The demand for retail floor space is declining in all retail centres. Concerns are raised that the Council may seek to resist changes of use within retail centres that reflect commercial reality, rather seek to retain retail floor space that will remain un-occupied to the detriment of the centre as a whole. In Chobham the amendment should reflect actual use as per the survey Shrink them to nothing in Windlesham 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of retail sites.</p>

Question 6b

Are there any sites which lie outside of the existing retail designations which you believe should be allocated as either neighbourhood centres or parades?

Summary of Responses	Council response
No	Noted

Question 6c

Do you feel the Council has identified all the possible policy options with regards to retail allocations? If not, please provide details.

Summary of Responses	Council response
Yes	Noted
No	Noted

Question 6d

Which of the identified policy options for retail do you feel is the most appropriate? Please explain why you think this?

Summary of Responses	Council response
<p>Option 1 (Do nothing) is most appropriate retail option:</p> <ul style="list-style-type: none"> • Most sustainable • Retail centres are well established and need rejuvenating. Easier to work on existing areas than create new. • No more out of town retail parks • Most appropriate approach for Lightwater 	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of retail sites.</p>
<p>Option 2 (Amend the retail centre boundaries) is most appropriate retail option:</p> <ul style="list-style-type: none"> • It expands the scope of the Frimley Green retail centre to include those units that are well integrated with the established focus of retailing. This will allow Frimley Green to more easily provide for the identified retailer demand. 	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of retail sites.</p>
<p>There can be no justification for the identification of new retail sites when there are presently too many shops in Surrey Heath. The Notcutts Nursery site proposals will inevitably draw trade away from other supermarkets.</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of retail sites.</p>

Summary of Responses	Council response
<p>The potential retail sites listed in Appendix 7 of the Issues and Options Paper all appear to be out-of-centre sites for which there is simply no justification and whose development would be contrary to the retail policies of the NPPF in that they would harm and prejudice Local Centres such as Lightwater. There is no identified 'need' for further retail development as is confirmed in paragraph 6.13 and all of these sites should therefore not be considered further and should be deleted from the Site Allocations document.</p>	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of retail sites.</p>

Section 5.E – Transport

Question 7c

Do you feel the Council has identified all the possible policy options with regards to the various transport allocations? If not, please provide details.

Summary of Responses	Council response
<p>No:</p> <ul style="list-style-type: none"> • The Sturt Road Chord is only one option. An equivalent chord from the same junction heads West to Farnborough. This may make the economics of a direct rail connection to London more favorable as it would attract traffic from the Farnborough hub as well relieving the A325 which chokes when rush hour trains arrive at Farnborough with traffic returning to Camberley as the current train service from Camberley is slow and is susceptible to operator closure for multiple reasons as the route does not meet travellers needs. Whilst a reversal would be required at Farnborough, the track alterations and extra traffic generated may make the scheme viable. Maybe funding for the A325 roundabout should be re-prioritised. • Create a new policy to support proposals for Junction/highway improvements at: <ul style="list-style-type: none"> • A30 London Road/Knoll Road/Kings Ride • A30 London Road/Park Street • Knoll Road/ Portesbery Road • High Street/ Portesbery Road / Pembroke Broadway • A30 London Road between town centre and Meadows gyratory. • A cycle network along A30 London Road/Knoll Road/Portesbery Road/Pembroke Broadway/Charles Street <p>Advantages/disadvantages: This option represents a low risk strategy in terms of delivery of required highway improvements.</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of transport sites.</p>
<p>Yes</p>	<p>Noted</p>

Summary of Responses	Council response
<p>The Highways Agency would encourage policy wording to address its central concerns on the national road network, which relate to congestion and safety on its road and which pertain principally to Junction 3 and 4a of the M3.</p> <p>Would suggest policies pertaining to each allocation and subsequent actions, which because of their size and proximity would have a 'significant' impact on the M3, particularly that relating Junction's 3 and 4a of the motorway and associated highways.</p> <p>Provisions should be made in each of the policies relating to the site allocations for a credible Transport Assessment to accompany proposals associated with developments, which address the concerns for the Secretary of State for Transport, whilst allowing for appropriate mitigation measures pertaining to the HA's central and subordinate concerns.</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of transport sites.</p>

Question 7d

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

Major Highway proposals:

Summary of Responses	Council response
<p>Policy Option 1 (Do nothing) is most appropriate of the four options:</p> <ul style="list-style-type: none"> • Due to congestion support retention and pursuance of Policy M1 	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of transport sites.</p>
<p>Policy Option 3 (New Policy to replace M1 and amend proposal boundaries) is most appropriate of the four options:</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of transport sites.</p>

Rear Servicing Policy Options:

Summary of Responses	Council response
Option 3 (Create new policy and amend Rear Servicing boundaries) is most appropriate of the four options.	Noted. Information will be taken into account in the selection of the preferred option for allocation of transport sites.

Sturt Chord Policy Options:

Summary of Responses	Council response
Option 1 (Do nothing) is most appropriate: <ul style="list-style-type: none"> • Support retention and pursuance of use of Sturt Chord. 	Noted. Information will be taken into account in the selection of the preferred option for allocation of transport sites.

Additional Car parking policy options: No comments

Section 5.F – Green Spaces

Question 8c

Do you feel the Council has identified all the possible policy options with regards to green spaces, SNCI's and SANG? If not, please provide details.

Green Space Policy Options:

Summary of Responses	Council response
Land east of St Catherines Road, Deepcut should be designated as green space	Noted
<p>As the education authority we would support both policies DM14 and DM15 in principle and we would only ever consider expanding school buildings onto playing fields as a last resort and where these areas were not required to meet the recreational needs of the school. There is a presumption against the loss of school playing fields to development under Section 77 of the School Standards Framework Act and in the NPPF (paragraph 74).</p> <p>However there may be exceptional circumstances where the most sustainable option is to expand a school on at least part of a school playing field site, where this is to meet residents' needs and deliver Core Strategy sustainable development, community wellbeing and life-long learning objectives. The most recent forecasts for basic needs for educational provision and the capacity for existing schools to expand to meet these needs to be explored in the context of the emerging DPD.</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of Green Space sites.</p>

SANG Policy Options:

Summary of Responses	Council response
Yes	Noted
<p>No:</p> <ul style="list-style-type: none"> Given that there is no SANG provision in the east of the borough for 10 to 100 	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>

Summary of Responses	Council response
<p>units schemes and that SANG land needs to be delivered in perpetuity, there needs to be greater consideration given to how SANGs can be delivered viably and in a timely manner so housing delivery does not grind to a halt in the borough.</p>	
<p>None appropriate:</p> <p>None of the proposed options for SANG are appropriate. Council should be looking to develop a policy which clearly outlines how they are going to work hard to identify additional SANG in term short term:</p> <p>New option:</p> <p>Designate more land as SANG. These should include both public and private SANG. Sites such as Broadford, Chobham should be identified. the policy needs to be positively worded in order to enable the delivery of SANG and more housing as a consequence.</p> <p>Furthermore, the site allocations document should not be progressed until adoptable SANG is identified in the Borough.</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>
<p>It is said that lack of suitable SANGS limits SHBC's capacity to deliver its housing targets. Yet the Issues and Options Paper states that land at the DERA site in Chobham and at Snow's Ride in Windlesham will be used to enable other Boroughs to meet their SANGS targets. This appears to be taking altruism to unnecessary extremes. Surely if this land is in Surrey Heath it should be applied to the Borough's requirements.</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>
<p>The Council should remain open to the potential that the PRB site in Deepcut could deliver some SANG capacity to facilitate off-site development - a point that was accepted by the Core Strategy examination Inspector.</p> <p>The site will provide 35ha of SANG, whilst the minimum requirement is 23ha. In addition, over 19ha of ANGSt is proposed, against a requirement of 10ha.</p> <p>The proposed SANG, together with over provision of ANGSt, could facilitate development elsewhere in the Borough, including the additional housing proposed at Deepcut, thereby assisting the Council further in meeting its housing</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>

Summary of Responses	Council response
requirement.	
The document is inconsistent in its treatment of SANGS. If the Notcutts SANGS is a potential site for housing, then the same should be said of Chobham Place Woods and other SANGS. The Notcutt SANG is designated and should not be used for non SANG purposes eg. housing	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
Without further review and agreement from Natural England on the potential SANG sites there is no guarantee that even if these sites are allocated as potential SANG through the Site Allocations Document that they will be able to come forward.	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
SANG associated with development proposals should be identified, eg. Land west of Hawkesworth Dr and south of the railway line	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
Eton College's land at Frimley Green (although wholly within 400m of the SPA and within a CBGB area), could accommodate some form of development or could be identified as a SANG (providing access to the SPA and a suitable location for recreation adjacent to the Basingstoke Canal) to assist in the delivery of additional housing in the borough (consistent with Government objectives).	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
There are some conservative sized bits of manorial waster which could be worked up as SANGS/open space.	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
There is an area at Mytchett, behind Coleford Bridge Road and the Mytchett centre which is used for nothing but would make a good SANGS area given the lakes and paths. It would link to the Blackwater Valley Path making a round trip walk possible. The land is privately owned and while good for wildlife it would make a good area of natural land for SANGS	Noted. Information will be taken into account in the selection of the preferred option for allocation of traveller sites.
Develop a policy which outlines clearly shows how the Council are going to progress the SANG at Bisley Common. The Site Allocations Document should not be progressed until adoptable SANG land is identified in the Borough. A policy needs to be developed detailing how the Council will engage with Surrey county council and Surrey wildlife Trust and facilitate the identification and	Noted. Information will be taken into account in the selection of the preferred option for allocation of Green Space sites.

Summary of Responses	Council response
adoption of Bisley common as a public SANG. It also needs to outline clear timescales for the delivery of this land.	

Question 8d

Which of the identified policy options do you feel is the most appropriate? Please explain why you think this.

Green Space Policy Options:

Summary of Responses	Council response
<p>Option 2 (amend Green Space boundaries) is most appropriate:</p> <ul style="list-style-type: none"> The boundaries of some of the Green Space designations around playing fields might be redrawn to accommodate essential additional education development and some sites withdrawn from designation as Green Space as appropriate – depending on the outcomes of the education needs and provision assessment work. 	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of Green space sites.</p>

SNCI Policy Options:

Summary of Responses	Council response
Option 2 (amend SNCI boundaries) is most appropriate:	Noted

SANG Policy Options:

Summary of Responses	Council response
<p>Option 1 (Do nothing) is most appropriate:</p> <ul style="list-style-type: none"> Have enough SANGS land in existence with Chobham Place Woods that would be adequate for the small number of housing allocations in Chobham. Therefore no more SANGS would be necessary for Chobham. Additionally because Chobham is unique having Chobham Common, (one of southern England's largest nature 	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>

Summary of Responses	Council response
<p>reserve), having a SANG in Chobham would serve less purpose as people would rather visit the Common. Therefore SANGS would have little effect of reducing the footfall on the Common so therefore are pointless.</p> <ul style="list-style-type: none"> • 	
<p>Option 1 (Do nothing) is not appropriate:</p> <ul style="list-style-type: none"> • Option does not provide certainty on this issue and will inevitably generate uncertainty with regards to how and where the Council's future housing requirements can be achieved, which is in direct conflict with the guidance set out in the NPPF. • Already severely impacting on housing delivery 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>
<p>Option 2 (Designate existing SANG) is not appropriate:</p> <ul style="list-style-type: none"> • Option does not provide certainty on this issue and will inevitably generate uncertainty with regards to how and where the Council's future housing requirements can be achieved, which is in direct conflict with the guidance set out in the NPPF. • A neutral policy which does not provide any proactive mechanism by which to identify new SANG. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>
<p>Option 3 (Designate existing and proposed SANG) is most appropriate:</p> <ul style="list-style-type: none"> • This is due to it designating proposed new SANG, which will be essential if the Council are to achieve their housing requirement. • All existing and potential SANG sites should be identified on the Proposals Map as they are fundamental to the successful implementation of the Core Strategy. We therefore recommend that any representations submitted support Policy Option 3 or 4, which seek to ensure that all existing and proposed SANGs are designated. • Natural England would particularly support this option which suggests designating existing and proposed SANG and showing existing and future SANG 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>

Summary of Responses	Council response
<p>commitments on the Policies Map. Agree that this would be beneficial in maintaining and supporting the use of land for SANG within the Borough and would help to provide certainty around the delivery of housing.</p>	
<p>Option 3 (Designate existing and proposed SANG) is not appropriate:</p> <ul style="list-style-type: none"> • A neutral policy which does not provide any proactive mechanism by which to identify new SANG. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>
<p>Option 4 (Designate existing and proposed SANG and create policy relating to site selection) is most appropriate:</p> <ul style="list-style-type: none"> • All existing and potential SANG sites should be identified on the Proposals Map as they are fundamental to the successful implementation of the Core Strategy. We therefore recommend that any representations submitted support Policy Option 3 or 4, which seek to ensure that all existing and proposed SANGs are designated. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>
<p>No problem in principle with option 4 but Natural England would wish to work closely with the Council on developing any such policy and it would be important to make sure that this was in line with existing guidance on SANG such as the TBH SPA Delivery Framework and Natural England’s SANG Guidelines.</p>	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>
<p>Option 4 (Designate and create policy) is not appropriate:</p> <ul style="list-style-type: none"> • Will inevitably generate uncertainty with regards to how and where the Council’s future housing requirements can be achieved, which is in direct conflict with the guidance set out in the NPPF. • Whilst this policy would provide developers with guidance on what is required for land to be designated as SANG it does not provide any solution to the issue of needing to find more SANG. 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>
<p>None of the SANG options are appropriate:</p> <ul style="list-style-type: none"> • Council should be looking to develop a policy which clearly outlines how they are going to work hard to identify additional SANG in term short term. • Consider that Council needs to move away from its low risk strategy and be more pro-active in the identification of SANG land. They need to be less reliant on 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>

Summary of Responses	Council response
<p>developers bringing sites forward and look to source suitable land themselves.</p> <ul style="list-style-type: none"> It is not appropriate for Surrey Heath to rely on a third party to deliver SANG land given that housing delivery within the Borough is so reliant on the identification of SANG land. 	
<p>When designating the proposed new SANG, a number of considerations need to be taken into account. The identification of SANG covering smaller areas than this must be questioned. It does for example, remove 4 of the potential SANG sites set out in Table 8.2 of the document from consideration. Of the remaining 4 sites, all offer a similar area of 24 – 26 hectares.</p> <p>It is also considered very necessary to assess the likelihood of such sites coming forward. As set out in the Core Strategy, the Council have been attempting to acquire the site East of St Catherine’s Rd, Deepcut for some time, but failure to do so to date would suggest this is unlikely to occur.</p> <p>A further consideration is to assess what development the future SANG is intended to serve. It is clear from the Council’s housing proposals set out within the Core Strategy, that by far the greatest concentration of new housing (excluding the PRB site which will benefit from its own SANG) is within Camberley. A combination of the town centre regeneration and other identified sites within Camberley, result in a figure of 860 dwellings being proposed for the town.</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of SANG sites.</p>

Question 8e

Do you feel any of the green spaces should be identified for special protection as Local Green Spaces? If so, which spaces and why do you think this?

Summary of Responses	Council response
No	Noted
<p>Yes:</p> <ul style="list-style-type: none"> Area east of St Catherines Road – already used as amenity area 	<p>Noted.</p> <p>Information will be taken into account in considering whether to</p>

Summary of Responses	Council response
<ul style="list-style-type: none"> • G/DPC G/DPC/3 Richmond Hill SNI should be considered together with Potential SANG Ref; G/DPC/11. They cover the same area of land between St.Catherine's Road, Frimley Green and Bellew Road, Deepcut and constitute a green division between the two settlements which should be maintained. • Green belt neighbouring Chobham Common • London Road Recreation Ground, including the Arena, as it is the only accessible green space within the ward of St Michael's. • Land north of Chobham Lakes – heavily wooded area, used by dog walkers with wildlife • Chobham Rugby Club. The club is well used by a large number of adults and children. The council should be encouraging sport. The field is used by dog walkers and joggers daily. 	<p>allocate Local green Spaces.</p>

Question 8f

Do you feel any of the proposed green spaces on the Princess Royal Barracks Site should be identified through the Site Allocations Documents as Green Spaces within Settlement Areas? If so, which spaces should be identified? Should any of these spaces be identified as Local Green Spaces? If so, why?

Summary of Responses	Council response
<p>Yes:</p> <ul style="list-style-type: none"> • Playing field at Blackdown Road / Woodend Road (G/DPC/8) is well used and enjoyed by local residents • The woodland at Blackdown Road (G/DPC/4) should also be recognised in the document as it is enjoyed by ramblers and dog walkers. • As per proposed development plans 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of Green Space and Local Green Space sites in Deepcut.</p>
<p>It is not considered appropriate to fix the boundaries of these spaces in advance of a permission for the residential-led development of the PRB site being implemented. The Deepcut SPD provides a Concept Plan for Deepcut, but this is broad framework</p>	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of Green Space and Local Green</p>

Summary of Responses	Council response
<p>only. Similarly the hybrid application provides an illustrative masterplan, but this is indicative only and it is understood, with the potential exception of SANG, that the Council do not wish to fix the locations of different land uses at this stage. DIO support such an approach, which enables flexibility for locations of the different land uses required by policy being determined at the detailed application stage.</p>	<p>Space sites in Deepcut.</p>

Question 8g

Do you have any comments on the site selection criteria for the Green Spaces in Settlements and the Sites of Nature Conservation Importance. Do you feel these are appropriate methodologies for the selection of these types of sites within Surrey Heath?

Summary of Responses	Council response
<p>No comments</p>	<p>-</p>

Section 5.F – Major Developed Sites in the Green Belt

Question 9a

Do you feel the Council has identified all the possible policy options with regards to Major Developed Sites in the Green Belt? If not, please provide details.

Summary of Responses	Council response
Yes	Noted
<p>No:</p> <ul style="list-style-type: none"> The existing Chobham Sewage Treatment Works and Lightwater Sewage Treatment Works sites should be included as MDS's. These sites contain essential infrastructure and significant levels of built development both above and below ground and fall within the original definition of major developed sites set out in PPG2 which set out in Appendix C that: <i>"Green Belts contain some major developed sites such as factories, collieries, power stations, water and sewage treatment works,....."</i> 	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>
<p><u>Proposed new policy for Fair Oaks:</u></p> <p>The Council recognises the local and regional importance of Fair Oaks Airport. The development of Fair Oaks Airport will be supported up to the level of the existing planning permission for the airport of 120,000 fixed wing aircraft movements per year.</p> <p>Proposals that would lead to or facilitate growth of operations at the airport beyond this level (and including any extension to the runway) will be assessed against:</p> <ul style="list-style-type: none"> – Consistency with national aviation policy; – Compliance with the airport masterplan; – The environmental impacts of the proposed development, including the effect of any increase in aircraft movements on noise and air quality; 	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>

Summary of Responses	Council response
<ul style="list-style-type: none"> – The need for surface access; and – The sustainable development Policy CP2 (from the Surrey Heath Core Strategy). <p>Where necessary, development must include mitigation measures to reduce impact on neighbouring uses and the surrounding environment.</p>	
<p><u>Suggested new New Policy for Fair Oaks:</u></p> <p>Within the airport boundary, as defined on the proposals map, development will only be permitted where it is for:</p> <ul style="list-style-type: none"> a) Airport operational purposes b) Facilities that would support the efficient operation of the airport <p>Proposals for non-operational uses and for employment development unrelated to the development of the airport will only be permitted within the defined MDS boundary and will need to demonstrate an overall enhancement of the appearance of the site.</p> <p>(N.B. Boundaries of MDS to be reconsidered during next stage of plan preparation process)</p>	<p>Noted.</p> <p>Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>

Question 9b

Which of the identified policy options do you feel is the most appropriate for each of the MDS sites? Please explain why you think this.

Summary of Responses	Council response
<p>Option 1 (Do nothing) is most appropriate:</p> <ul style="list-style-type: none"> • To retain the existing Green Belt and settlement boundaries to prevent urban 	<p>Noted.</p> <p>Information will be taken into account in the selection of the</p>

Summary of Responses	Council response
<p>sprawl.</p> <ul style="list-style-type: none"> Relaxation of planning controls on all three existing MDS sites could be extremely detrimental 	<p>preferred option for allocation of MDS sites.</p>
<p>Option 2 (Retain saved policy RE17 & amend MDS boundaries) is not appropriate:</p> <p>Does not go far enough because it fails to establish a positive policy context for the airport.</p>	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>
<p>Option 1 (Do nothing) is not appropriate:</p> <p>Unlikely to represent a sound policy approach. Retention of the existing MDS boundary will be likely to compromise the successful revitalisation of the airport and the benefits set out above, and therefore fail to support, and in all likelihood undermine, the objectives of the Core Strategy and national policy to support the role of Fair Oaks as a business aviation service provider and important local employer.</p>	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>
<p>Option 3 (Create new policy and retain existing MDS boundary) is not appropriate:</p> <p>Unlikely to represent a sound policy approach. Retention of the existing MDS boundary will be likely to compromise the successful revitalisation of the airport and the benefits set out above, and therefore fail to support, and in all likelihood undermine, the objectives of the Core Strategy and national policy to support the role of Fair Oaks as a business aviation service provider and important local employer.</p>	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>
<p>Option 4 (Create new policy and amend MDS boundary) is most appropriate:</p> <ul style="list-style-type: none"> Will most likely offer the greatest prospects of securing positive development of Fair Oaks in accordance with the national aviation policies support for smaller airports and business aviation and that contained in the Core Strategy. Boundary adjustment would need to be supported by airport masterplan. It has already been recognized that the existing policy and its boundaries are 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>

Summary of Responses	Council response
<p>outdated (eg. DERA site is covered by a new SPA buffer which severely limits development options on that site). However, this does not mean that a policy with designated Major Development Sites is redundant, for despite the NPPF failing to carry over the MDS category from PPG2 it remains that there will be sites and businesses within the district that predate the Green Belt designation, which continue to serve a useful purpose to the economy of the district and which should be subject to less strictly controlled development criteria than the bulk of brownfield land in the Green Belt.</p>	
<p>Option 5 (Delete Policy RE17 & MDS designation) is most appropriate:</p> <ul style="list-style-type: none"> • A sound and also safe policy. 	
<p>Option 6 (Re-designate) is most appropriate:</p> <ul style="list-style-type: none"> • MDS designation strongly implies a future of development for these sites, which may not wholly/in part be the case. 	
<p>Advantage of Option 4 over Option 5 is that Option 4 provides the opportunity to put in place a specific supportive policy as well as criteria to control development and to direct development within a clearly defined MDS boundary. Given the local and wider importance of Fairoaks for businesses aviation, employment and economic development and its potential impacts (e.g. noise) as well as the permitted development rights conferred to FOL which limits control over some developments we consider that reliance purely on the NPPF would fail to meet the NPPFs own guidance to plan positively for required economic development and infrastructure with the objective of achieving sustainable development.</p>	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>
<p>Option 6 (Redesignate) is most appropriate option:</p> <ul style="list-style-type: none"> • provides for the re-designation of the airport for non airport related development / other uses. In the event that the airport was not able to be revitalised through redevelopment and a supportive policy framework, it could accelerate its decline. In which case consideration would then need 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>

Summary of Responses	Council response
<p>to be given to alternative uses for the site. But we consider that this option is unnecessary and unjustified at this stage.</p>	

Question 9c

How compliant is the MDS policy with the NPPF? Do you feel there are any local circumstances that would justify Surrey Heath continuing with the MDS designation?

Summary of Responses	Council response
<p>No:</p> <ul style="list-style-type: none"> • MDS's have too big an impact on areas around them. 	<p>Noted</p>
<p>Yes:</p> <ul style="list-style-type: none"> • Retention of an MDS would support the positive planning of the site and guide future sustainable development. • Although the NPPF has not retained MDS status it has been kept by councils in Core Strategies and we believe should be continued in SHBC as a valuable tool to allow for reasonable infilling and redevelopment as detailed in the 2000 SHBC Local Plan, policies RE17 and M21. Fair Oaks is an important business site but its location in an environmentally sensitive area with huge potential impact on the Green Belt must be recognised in the Core Strategy. There has been no change to the factors which gave rise to RE17 & M21. If anything the increased pressure on the Green Belt makes their retention even more important. • It remains unclear if the abandonment of the MDS designation in the NPPF was intended to mean that limited infilling and partial or complete 	<p>Noted. Information will be taken into account in the selection of the preferred option for allocation of MDS sites.</p>

Summary of Responses	Council response
<p>redevelopment could occur on <u>all</u> brownfield sites in the Green Belt, as the Government has provided no guidance on this point. It is therefore considered that for the purpose of clarity as to which sites bullet point 6 of paragraph 89 of the NPPF applies, the MDS policy should be retained.</p>	

Section 5.G – SA/SEA and other background documents

Question 10

Do you have any comments on the Interim SA/SEA that has been prepared to support the Issues and Options Stage of the Site allocations Document?

Summary of Responses	Council response
Pleased to note that the Interim SA/SEA Report has taken water resources, quality and wildlife into consideration. Generally, support the prioritisation of the sustainability rankings noted in the report.	Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.
Major omission is the cumulative impact of the M3 widening J 2a to 4 and the rumoured new M3 J 3a. Both of these would hugely increase carbon dioxide, NOX and SOX pollution (entirely contrary to the bald assertion in SA/SEA NTS that these are expected to fall).	Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.
Appears to be no review of impacts of proposed developments in plan on wider area.	Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.
Pleased to note that the importance of considering the historic environment has been included within the Appraisal Matrices for Housing Options. This is an important inclusion, as it should mean that on an individual site-by-site basis, adequate consideration is given to heritage concerns as an when the areas are selected for appraisal and development.	Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.
Could not find your comments on developing health provision with the increased population proposed. The GP practices, and Frimley Park Hospital are at full capacity, so some practices are going to have to expand, especially near any new traveller sites as they tend to be high service users.	Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.
Any building to this extent on green belt is inappropriate, the green belt is there for a reason to prevent urban sprawl and retain the village	Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.
Unhappy with the vast development proposed for Bisley and the potential impact on the infrastructure within the village and surrounding area. Further greater concern regarding the proposals for West End and the potential	Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.

Summary of Responses	Council response
<p>impact on the facilities in West End and Bisley that residents are dependent on.</p> <p>Support Housing Delivery - 2. -as more SANG would be pointless due to ineffective reduction of footfall on the Common.</p> <p>Support Areas of Urban Green Space – 1 to Retain Boundaries / Extent of Green Spaces and Sites of Nature Conservation Importance – 1 Retain Existing Boundaries/ Extent of Sites.</p> <p>Chobham is “washed over” with Green Belt and this must remain so due to the Common that is unique to Chobham.</p> <p>By building outside the current settlement area, on agricultural land and on Green Belt land there is a risk of urban sprawl, loss of wildlife and impact on the common.</p> <p>Agree we must provide some need for affordable housing subject to infrastructure, traffic and accessibility onto good roads etc but it has to be in the right places - within the current settlement boundaries, on footprint of existing structures and not in the green belt.</p> <p>Agricultural land should be preserved as such, as it could provide the opportunities for local businesses and employment. An example would be for equestrian, use as this is a thriving business for Chobham, is in much demand due to its location near the Common, and would provide employment for the village. A slightly less desirable option would be to convert the site to allotments.</p> <p>If agricultural land is allocated to housing development, this could lead to land speculation.</p> <p>The impact of the possible major large scale development sites of DERA (2,500 homes) and PRB - Deepcut Barracks (1200 new homes) must be taken into consideration when considering development allocations in Chobham. Chobham is sandwiched between these 2 major sites being the thoroughfare for both the M25 and M3 and to large towns of Woking and Guildford. Chobham is currently a very busy congested village, so would therefore suggest you only consider very small numbers – such as windfall sites up to 5 Units - in the near future until the impact of</p>	<p>Noted.</p> <p>Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.</p>

Summary of Responses	Council response
<p>DERA and PRB is known.</p>	
<p>Table 4.1 – Summary of Generic Housing Options (Page 96) Concerned that Option 3 (Use existing settlement supply & develop new SANG) is being recommended as an option that should be pursued further. The evidence indicates that to meet housing needs there would need to be 12,830 new homes delivered over the 2011 to 2028 period. By constraining the supply to existing settlements there is a risk that housing supply may be constrained and local needs not addressed to the extent planned for in the Core Strategy. The NPPF seeks to significantly boost the supply of housing and we consider that housing targets should be treated as minimum. Therefore to avoid local needs for housing supply being further exacerbated we recommend that option 4 (Phase forward large sites in CBGB to meet potential 2026-2028 shortfall) is pursued.</p> <p>Table 4.12 – Sustainability Ranking of Potential Housing Sites & Appraisal of Options for Local Plan 2000 Policy H8: Housing Reserve Sites: West End The West End Reserve Site has been ranked 88 out of 94 potential housing sites in terms of sustainability. Would question the comment relating to ‘uncertain effects’ on the SPA given the Policy context that is set by Policy CP14B (European Sites) and the need for new residential developments to provide or contribute towards the provision or creation of SANGs. Releasing the Site for development would also have a positive effect on employment which has not been recognised in the assessment.</p> <p>The Council’s SA indicates that they consider that the most sustainable option would be to delete Policy H8 (West End Housing Reserve Site). How did the Council to this conclusion? With regards to this Option we would query the scores that have been assigned to the following objectives: Objective 17: Ensure protection of the Special Protection Area – We consider that if the Site was to allocated for housing development and subsequently developed that it would have to provide on site SANGs or contribute to offsite SANG provision. Therefore we consider that retaining the site for housing would help to protect the</p>	<p>Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.</p>

Summary of Responses	Council response
<p>SPA via implementation of the SANGs mitigation strategy. Therefore the assessment should be changed to a minor positive.</p> <p>Objective 26: Supporting economic activity and agricultural activity in rural areas – If the Site was released for housing then approximate 170 residential units would be delivered on the site. This would help to directly and indirectly create employment opportunities. Therefore the score should be changed to a significant positive</p> <p>Appraisal of options for SANGs Support the recommendation in the SA that option 3 (Designate Existing and Proposed SANG) and option 4 (Designate Existing SANG and Create Policy for Selection of New SANG) is pursued further.</p>	
<p>No matching of the two documents (SA/SEA with the Issues and Options document) and the Issues and Options document does not follow the recommendations in the SA/SEA document. As an example, paragraph 2.38 of SA/SEA document Interim Report states “Existing open space, sport and leisure facilities will aid improvement but Document should consider allocating further open space areas through the green spaces review and Core Strategy open space standards to allocated housing sites.” however there is no evidence in the Issues and Options document of this being taken into account, or reasons being given for why it hasn't done so. Particularly with regards to site Bisley site H/BIS/11 “F C Brown Ltd” where no specific actions are identified in the Issues and Options document to address the recommendations in the SA/SEA in relation to this allocation site. Given the above, the Issues and Options document should have a correspondence matrix that maps it to the SA/SEA document to make it clearer which recommendations in the SE/SEA were or were not taken forward.</p>	<p>Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.</p>
<p>Land off Beldham Road -15 Rank 88</p> <p>Land at Fenns Lane -25 Rank 92</p> <p>You indicate in Table N-4 however that those sites highlighted in yellow have been</p>	<p>Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.</p>

Summary of Responses	Council response
<p>ranked as Care/Nursing/Sheltered Accommodation (Dykmere, Street Heath), employment sites (Pankhurst Farm, West End Reserve) and in some cases also as a retail site (West End Reserve), a SANG site (Old House Lane and Pankhurst Farm). You then go on in Table N-10 to say that there has been a deletion from the Existing House Allocation of a number of sites including:</p> <p>This would appear to be contradictory and to leave just Pankhurst Farm, Land off Beldham Road and Land at Fenns Lane all of which have not entirely dissimilar rankings. I would urge you to retain Land West of Fenns Lane as a suitable and sustainable site to provide for the housing need in West End.</p>	
<p>Table 4-4 the 'Sustainability Ranking of Potential Housing Sites within Bisley', includes an appraisal of the FC Brown's, Queens Road. The table identifies the ranking of three potential sites for residential development in Bisley and FC Brown's is ranked the highest amongst the three sites. The overall ranking of the site within the District is 56 and in terms of its score, it is awarded 15. The other two sites in Bisley meanwhile are ranked 60th and 73rd and achieve scores of 11 and -4. It is clear that the FC Brown's site is therefore more sustainable and should be the preferred site for residential development in Bisley.</p>	<p>Noted. Comments will be taken into account in the preparation of future iterations of the SA/SEA for the site Allocations work.</p>

Question 11

Do you have any comments on other background documents such as background technical reports?

Summary of Responses	Council response
<p>SNCI Site Selection Criteria:</p> <ul style="list-style-type: none"> Land West of Fenns Lane is not significant for SNCI. Whilst within the designated green belt it is bounded on three sides by development. It is understood that the adjacent heathland is of interest but it is unlikely that a suitable development of this land would have any material effect on this. Surrey Wildlife Trust welcomes this use of the guidance criteria as published. 	<p>Noted.</p>
<p>Flood Risk Sequential Test:</p>	<p>Noted</p>

Summary of Responses	Council response
<p>The Environment Agency acknowledge that you have identified the necessity to undertake a sequential test of the site allocations as to manage flood risk and to meet the requirements of the National Planning Policy Framework (NPPF). This has been stated through policy DM10 of your Core Strategy and is also noted on page 161 of the SA/SEA Interim Report. However, we cannot clearly see that the council have yet undertaken a flood risk sequential test and we are concerned that if the council decide to allocate sites in flood zones that the document may not be sound without such evidence.</p>	