

West End Action Group (WEAG)

Commenting on the draft Local Plan

4 July 2018

Dear WEAG supporter,

You may already know that Surrey Heath Borough Council (SHBC) has published a draft Local Plan setting out policies for development in the Borough. SHBC are asking for comments from the public, prior to the Council producing a final version. The deadline for comments is **30 July**.

The draft Local Plan may be viewed online and/or downloaded from

<https://consult.surreyheath.gov.uk/consult.ti/LPIO2018/>

This page also gives details of how to send comments. The key document is 'Surrey Heath Draft Local Plan Issues Options/Preferred Options, 2018'.

The WEAG Committee has drafted some comments, which are shown on the pages below. We ask you to do two things:

- Please read our draft and if you have any comments to help improve it (agreeing, disagreeing, adding further points) email them directly to me at guy@consterdine.com by **18 July**
- Send your own comments, in your own words, to SHBC by **30 July**

Two of the most important policies in the draft Local Plan are that the current extent of the Green Belt will be maintained, and development in the 'Countryside beyond the Green Belt' will be subject to greater limitations than development in settlement areas. However they won't necessarily stay in the final version of the Local Plan if they don't receive much public support, so please at least submit a response to say in a sentence or two that you support these policies (if you do).

Thank you, and regards

Guy Consterdine
Secretary, WEAG
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See draft comments below

West End Action Group: Submission of comments on draft Local Plan

July 2018

This submission about Surrey Heath Borough Council's draft Local Plan has been prepared during June and July 2018 by the West End Action Group, in consultation with all its members. It takes the form of replying to certain of the questions posed in the draft Local Plan.

Vision and objectives

Question 1: Do you agree with the preferred approach to the Vision and Objectives? If not, please specify why, including any alternative approaches that the Council should consider.

- Generally agree.
- We are not happy with the "presumption in favour of sustainable development" (page 17-18) but recognise that there is no alternative since the NPPF requires that the Council includes this presumption, and recent planning appeals concerning West End have reinforced this.
- In listing the studies consulted in preparing the draft Local Plan, specific neighbourhood plans are mentioned (page 5) but we believe West End's Village Design Statement should also be mentioned at this point and be taken account of. (The Village Design Statement is mentioned later in the document.)
- We concur with the list of Key Challenges set out on page 10 but place special emphasis on challenge 7: "To ensure that development within the Green Belt and Countryside beyond the Green Belt does not have a detrimental impact on the openness of the Green Belt and on the character of Countryside beyond the Green Belt."
- Among the Strategic Objectives (page 13), we draw particular attention to Objective D, ensuring that development is supported by the necessary infrastructure. We are distressed that the 350+ homes currently being built in West End are arriving before the infrastructure. We think it should be infrastructure first, new houses second.
- Regarding Objective F, we note that on environment pollution any new development will lead to air pollution with increased car traffic, and further traffic congestion problems, especially in areas where there is limited public transport, such as West End, Windlesham, Lightwater and Chobham.
- We strongly endorse Objective I, "To protect and enhance the character of the Green Belt and countryside beyond the Green Belt."

Spatial strategy

Question 2: "Do you agree with the preferred approach to the Spatial Strategy for the Borough? If not, please specify why, including any alternative approaches that the Council should consider."

- We endorse and highlight as especially important to West End the stated approach to the Green Belt and Countryside beyond the Green Belt: “The current extent of the Green Belt will be maintained and development in the Green Belt will be strictly limited; Development in the Countryside beyond the Green Belt which results in the coalescence of settlements will not be permitted; Development in the Countryside beyond the Green Belt will be subject to greater limitations than development in settlement areas.”

Housing

Question 3: “Do you agree with the approach SHBC has taken in identifying how much housing can be delivered within Surrey Heath over the plan period?”

- On page 23, paragraph 3.17 states “It is not considered at this stage that there are any overriding Exceptional Circumstances to warrant the alteration of Green Belt boundaries.” We strongly agree.
- On page 24, paragraph 3.23 states “The preferred approach seeks to provide the housing within settlement areas, on brownfield sites or on sites already identified or allocated in the current Local Plan (the Core Strategy and the Camberley Town Centre Area Action Plan).” We endorse this.
- However the paragraph continues “the number of homes the Council needs to deliver over the new Local Plan period (2016-2032) means that the Council has had to identify land which is currently designated as Countryside beyond the Green Belt, this will mean a change to settlement boundaries in those areas”. We do not think this can apply to West End, as discussed below.
- Having studied the relevant parcels of land identified in the Countryside beyond the Green Belt studies, we believe none of those which lie in West End are suitable for more housing:
 - C25: this is Turf Hill Park – open heathland totally inappropriate for housing or other development
 - C26: the open heathland of Brentmoor Heath, the military land, and Bisley ranges
 - C35: land east of Benner Lane and the northern section of Beldam Bridge Road: most of this land is already under construction by Taylor Wimpey and Martin Grant Homes. The rest consists of Holy Trinity School and its playing field; Malthouse Farm; four houses at the top of Fairfield Lane; and a small piece of land in the extreme north east which forms part of the open country between West End and Chobham (on which see also our comment in Question 34, paragraph 9.61).
 - C36: this land south of Kings Road already has housing under construction by Shanly and Thakeham. There is just a small area alongside the A322 where the cane furniture sales outlet used to stand whose future is uncertain.
- The ‘Preferred policy approach to housing delivery’ (page 25) cites 450 dwellings on West End’s ‘reserve sites’, of which 322 are already committed. In fact there is now a further number which are also committed. We do not believe that taking the number of dwellings within the ‘reserve area’ to 450 is realistic. The table in Appendix 2 of the Surrey Heath Strategic Land Availability Assessment claims to show that 141 dwellings could be accommodated on Site ID 178, last east of Benner Lane. The SLAA 2017 Officer Site Assessment document puts the figure at 135. 95 of these are currently under construction by Martin Grant Homes. The outstanding dwellings, to reach 450 total, cannot be

accommodated on the remaining land, which consists mostly of Holy Trinity School and its playing field, and existing houses.

- More dwellings could be specified for Camberley town centre, if first floor space is devoted to residential use as suggested – an excellent policy. See also our response to Question 15 below.

Gypsy, Traveller and Travelling Showpeople sites

Question 5: “Do you agree with the approach SHBC has taken to the provision of Gypsy and Traveller and Travelling Showpeople sites?”

- No. We do not agree with the policy that “seeks the provision of new pitches or sites within settlement areas in the first instance”.

Affordable Housing

Question 10: “Do you agree with the approach SHBC has taken in identifying the approach to affordable housing?”

- Yes

Retail

Question 15: “Do you agree with the preferred policy approaches to the retail centres in the borough?”

- Yes, but please recognise that the retail sector is currently undergoing a revolution due to online shopping, changes in other behavioural patterns, rising business rates and high car parking charges.
- This will affect the Camberley shopping centre rather than the smaller local centres which serve very local needs. Accordingly the proposed “Development Management policy which sets out that development at first floor level or above should consider office or residential accommodation in the first instance” is welcomed, and should receive more emphasis. Residential (rather than office) accommodation at first floor level will not only use the space effectively and provide customers for the ground floor shops but also contribute to the housing targets – and thus save rural villages from further despoliation.

Biodiversity

Question 17: “Do you agree with the preferred policy approaches to the Biodiversity in the borough?”

- Yes, the protection of existing biodiversity, European sites and nature conservation is very important.

Pollution

“Question 18: Do you agree with the preferred policy approach to addressing recognised and potential pollution issues in the borough?”

DEFRA has identified a section of the M3 and the houses on either side as an Air Quality Management Area (AQMA). Special consideration should also be given to pollution (air quality, particulates, odour, noise and light pollution) in areas adjacent to the A322, A321 and A319 where they pass through the Borough (but not necessarily AQMAs).

Flood risk

“Question 19: Do you agree with the preferred policy approach to the addressing recognised and potential flood risk issues in the borough?”

- Yes. It is common sense to avoid building on areas of high flood risk.

Energy

Question 20: “Do you agree with the preferred policy approach to Renewable and Low carbon Energy proposals?”

- Yes

Delivery of infrastructure

Question 21: “Do you agree with the preferred policy approach to the Infrastructure Delivery in Surrey Heath?”

Yes

We particularly applaud the policy which “ensures the provision of infrastructure is linked to the phasing of development so that infrastructure is delivered in a co-ordinated and timely fashion”. In practice, this has sometimes been ignored. In particular we are distressed that this did not happen with the 350+ houses currently being built in West End, where construction has begun without any new infrastructure being in place.

Transport

Question 22: “Do you agree with the preferred policy approach to transport?”

- Yes in part - but any traffic assessments must be realistic and not based on out of date modelling apps or inaccurate input data. For example Surrey Heath, and particularly the villages east of Chobham Ridges, have unusually high car ownership, averaging around 2 cars per household; using national car ownership data is not accurate enough and would produce under-estimates of traffic volumes.
- The requirement that “proposals that generate a significant amount of traffic generation will be required to provide a Transport Assessment and Travel Plan” is excellent, but developers should not be allowed to get round it by pretending that any significant number of people in the villages east of Chobham Ridges will be using public transport.

Community & culture infrastructure and facilities

Question 23: “Do you agree with the preferred policy approach to ensuring provision of community uses in Surrey Heath?”

- No – we prefer the alternative as it is more specific and relevant for individual sites.

Green infrastructure and open space

Question 24: “Do you agree with the preferred policy approach to green infrastructure and green open space designations in Surrey Heath?”

- Yes.

Recreation

Question 25: "Do you agree with the preferred policy approach to recreational uses in Surrey Heath?"

- Yes

Telecommunications and broadband

Question 26: "Do you agree with the preferred policy approach to the provision of telecommunications and broadband?"

- Yes

Green Belt and Countryside beyond the Green Belt

Question 27: "Do you agree with the preferred policy approaches to addressing the Green Belt and Countryside beyond the Green Belt in Surrey Heath?"

- Yes in general but with the following proviso
- Infilling within the Green Belt: infilling by building houses which would join up two separate groups of houses in the Green Belt, thus forming a continuous strip of buildings instead of the existing open gap, should not be permitted, as it would destroy much of what is left of the open character of that area.

Design

Question 28: "Do you agree with the preferred policy approaches to addressing design in Surrey Heath?"

- Yes

Design

Question 29: "Do you consider that the Council should require new development to meet the nationally described space standards?"

- Yes

Vehicular parking standards

Question 30: "Do you consider that the Borough needs its own vehicular parking standards?"

- Yes. Since Surrey Heath has exceptionally high car ownership, there needs to be adequate space to park cars.
- One of the big problems of traffic in the Borough is the number of cars which have to use the roads outside the houses as their permanent parking spaces, because there is no room elsewhere. In West End, for example (as in other villages), there are many residential roads which are always clogged with parked cars, making driving along the roads difficult through the chicane, or leaving no gaps in which cars travelling in opposite directions may seek refuge while the other car passes by.

Heritage assets

Question 31: "Do you agree with the preferred policy approach to addressing heritage assets in Surrey Heath?"

- Yes.

- The policy stating “the need for schemes affecting archaeological sites to submit desk-based assessments” is too weak, and is sometimes an excuse to get round the need for more thorough investigation. The regionally significant discovery of an Iron Age settlement in West End, with roundhouses and other buildings, would never have been made if desk-based research was all that was done. On large sites there should be a requirement for exploratory archaeological excavation, as at Benner Lane, West End in summer 2017.

Local area policies: the east of the Borough

Question 34: “Do you agree with the preferred policy approaches to local area policies in the east of the Borough?”

West End:

- Paragraph 9.61: Extending the boundaries of the settlement area to include the parts of the ‘reserve site’ on which planning permission has been granted is sensible. However there is a part of the reserve site (part of parcel C35 as defined in the Green Belt and Countryside beyond the Green Belt study) which should not be included within the settlement boundary, namely the undeveloped piece of land east and north-east of Holy Trinity School and the final house at the top of Fairfield Lane. It forms part of the open country between West End and Chobham.
- Paragraph 9.63: the open gap between West End and Bisley is very narrow and it is vital that no building takes place within it.
- Paragraph 9.66: public transport is indeed very limited – so limited that for the vast majority of residents a car is essential to get anywhere outside the village. No credence should be given to claims by any further developers that public transport is a realistic proposition.
- The policy on permitting rural exception sites: we do not think this policy should apply to West End.
- Green spaces: the list should include Fellow Green, and the triangle of land bounded by northern Benner Lane, the north-south section of Streets Heath, and the A319.
- Transport - the policy of improving cycle access to Woking: this is good in principle, but cycle lanes in the existing narrow twisting lanes to Scotts Grove would be unrealistic, leaving indirect routes via main roads as the only viable possibility. Cycle lanes between Bisley, West End and Lightwater would be an asset but the A322 along most of this stretch is too narrow to accommodate them.

Chobham:

Paragraph 9.53: We are strongly opposed to turning Fairoaks Airport into a new settlement of 1200+ houses. We recognise that this is not proposed in the draft Local Plan but the published outline plan for such a mini-town is much debated. There would be a serious effect on West End from the large volume of additional traffic generated, on top of the traffic congestion that West End is already experiencing every day.