

Draft Surrey Heath Local Plan (2019 - 2038): Preferred Options Regulation 18 Consultation

Windlesham Parish Council Response

The Council would like to thank the Planning Policy team for their production of the Draft Surrey Heath Local Plan: Preferred Options (2019-2038) and accompanying documentation.

Comments have been compiled from the Bagshot, Lightwater and Windlesham village committees and in summary the council would like to make the following points:

- Consultation with a Statutory Authority has to be rethought as Parish Councils are elected statutory authorities acting as statutory consultees and therefore are part of the planning process.
- Development must be appropriate for the location with adequate infrastructure to sustain the development and the Council does not see evidence of this in its 3 villages.
- No adequate provision is made for starter homes for those wanting to put the foot on the property ladder. The Council seems to favour socially rented and we believe the Council should have the ambition to frame policy that protects the family nucleus and allows children to put down roots where they grew up.
- Developers need to be held to account with more emphasis in making sure development is progressed and land not just banked. This very issue cost the residents of Bagshot their last water meadow and the loss of habitat for hundreds of species.
- Green belt, heritage sites and the Special Scientific Interest sites need to be preserved.
- Whilst it is encouraged that Camberley Town Centre is the focus of improvement in the Borough this should not be at the detriment to the villages.

Section 1: Key Challenges, Vision and Objectives

Windlesham Parish Council (WPC) accepts SHBC faces several challenges in delivering housing to meet future needs. Whilst supportive of SHBC's stated aims and objectives it has concerns that, the National framework within which they are being asked to prepare this Plan (NPPF 2021), is itself demanding opposing requirements be met. We recognise SHBC's statutory duty to provide a centrally determined quota of housing within this plan but believe this quota to be unrealistically high and driven not by local need but by pressure from developers upon the government as the housing market is artificially high and lucrative. We would support any opportunity to secure a reduction in the quota set, especially for the 6 villages area of the borough where much of the property built is being built and marketed specifically to London catchment areas where their prices are higher.

WPC agree it is very important to upgrade infrastructure to cope with any future developments. There are many concerns in all 3 villages regarding infrastructure i.e., burdens on doctor surgeries, already at capacity due to an expanding elderly population.

Section 2: Spatial Strategy

New Homes

It is of concern that Surrey Heath seems to be expected to take on a high volume of housing compared to the size of the Borough. The projected figure of 6,082 new homes is unsustainable, especially when taking into consideration the high volume of dwellings being built/planned in neighbouring boroughs.

Bagshot:

Bagshot Village, which sits to the west of the Borough has already been ravaged by development, with a proliferation of care homes on the A30, the residential development on Earlswood Park, conversion of office blocks and more recently the development on Chapel Lane. The Earlswood development has severely impacted traffic on the A30 with the light sequencing problems yet to be resolved and the Costa coffee turn off causing further disruptions.

According to the draft local plan Bagshot is to take the highest number of new homes in the 6 villages, only surpassed by Deepcut (a 2013 grant sold to residents on the basis that it would solve the housing land supply, but failure by the LPA to enforce it meant that development is only now starting to take shape, some 9 years later!).

Lightwater:

The Document sets out that about 20 new dwellings are to be built in Lightwater.

This is a surprise as the Parish Council is aware of 3 schemes delivering at least 3 times that amount:

- Deepcut Garage site is set to deliver 34 dwellings with insufficient parking.
- The Fredericks Foundation Building has been empty for some time and we understand the owner wishes to convert it to flats.
- The Lightwater Club is looking at extending to create a number of smaller flats above the club.

- Not to mention Broadway Farm with its latest proposal of 8 dwellings.

Windlesham:

Windlesham is reliant on neighbouring villages for services, yet the draft plan suggests 173 new dwellings to be built in the 2019-2038 local plan and this is far more than the Windlesham Neighbourhood Plan (WNP) forecast. This steep rise in dwellings would change the face of a village where resources are already stretched beyond reason and put a heavy toll on the quality of life of local residents.

With the future Longcross development for 1700 homes close to its boundaries, huge pressure will be put on Windlesham village.

SS2: Presumption in Favour of Sustainable Development

The Parish Council recognises the national policy presumption in favour of sustainable development and supports the principle of development being allowed to proceed where it accords with national and local policy, provided such policy is suitable for the locality, robustly worded and interpretations are clear.

There are concerns regarding any policy (such as some prior approval applications) which allow for development to proceed should the planning authority fail to determine within a prescribed period.

This has the potential to seriously undermine the plan objectives, the Parish Council would like to see this acknowledged and addressed as far as possible in the Local Plan.

The council supports the objectives of protecting Green Belt and habitat sites which include Special Protection Areas and Special Areas of Conservation.

SS3 and SS3b: Climate Change Mitigation and Adaption

The Parish Council supports policies regarding climate change mitigation and adaptation and approves of development being directed towards areas that will minimise the need to travel and maximise the use of sustainable modes of transport.

We note that Policy SS3a f) states 'ensuring trees are protected'. We hope this is supported due to past concerns which have been raised over no control over developers once building commences. It has been reported tree protection is ignored and there has been no protection for established hedgerows.

Section 3: Housing

HA1: Housing Allocations

While this Council understands that the housing numbers are imposed, we believe they are wholly inappropriate for a small, land locked Borough like Surrey Heath without having to change the character of its landscape by mandating high rises in each new development, which while it might be suitable in a centre of town location, it is not suitable in rural villages.

Bagshot

It is noted that housing allocation for Bagshot Village includes 26 homes at 134 to 136 London Road and 50 homes at the Bagshot Depot and Archaeology Centre, London Road.

Bagshot is to take the highest number of new homes in the 6 villages, only surpassed by Deepcut.

Lightwater:

As mentioned previously, any development in Lightwater will be limited due to the very small amount of land the village has available for development.

Windlesham:

The council has noted that the housing allocation for Windlesham Village includes 116 homes at the East of Heathpark Drive.

It is considered this development satisfies the policies H5 (Range & Mix of Housing), H7 (Affordable Housing), H9 (Rural Exception Sites) and H10 (First home Exception Sites) in the SHBC Local Draft Plan.

Windlesham Neighbourhood Plan

Windlesham village is the only village in WPC and indeed Surrey Heath, to have made a Neighbourhood Plan.

The process to get a Neighbourhood plan is lengthy and requires buy in from residents at every step with the final document presented to referendum for adoption. During this period, the WNP was put under the microscope and the needs of the village highlighted and shared by residents.

The WNP sets out the type of development suitable for the village and looked at a 1-2% organic growth in housing with roughly 50 new dwellings in 2018-2028.

Error on SHBC Plan – Reserve site in Windlesham village

We note an error has been made on the map at page 31 of the Draft SHBC Local plan which is showing an area on Woodlands lane from the already granted development at "Heathpark Woods", (site 177 lost on appeal to the Government inspector), through to site ID 844 within the SLAA 2019 which is sited next to the M3 as ALL being reserved site, but this is not the case as the Land between these 2 sites is actually still "Green Belt", There has been no formal designated change of use to this area which explains why there were inappropriate speculative applications made for developing the land on the properties "St Margarets Cottage" and "The Ferns" (application 20/1070/FFU). These properties are not listed as a Reserve site under the SHBC SLAA 2019 and it is not included within site ID 177 (Heathpark Woods). We know that in 2008 when planning was sought and given for a construction of a dwelling on the site which is now St Margaret's, the plot was described as "Predominantly wooded in character and within the green belt" (Ref 08/1065 – Design and access statement received by SHBC on 24th November 2008)

H5: Range and Mix of Housing

Council supports the provision of a mix of housing to match local needs and supports that those homes should be adaptable for changing needs over time.

It is noted that accessible parking should also be considered to allow those with mobility issues to stay in their homes for longer.

Bagshot & Lightwater

While the villages have good provision of large family homes and care homes, there is no provision for starter homes, forcing children of residents in the village to have to move out of area to be able to afford property. This is contrary to the sense of place the Borough is aiming to create.

Windlesham

When Heathpark Woods, Shepherds Lane and Broadley Green are built, Windlesham will have nearly 170 new homes with a mix of 2, 3 and 4 beds, plus bungalows and a care home.

So, with this change in the mix of housing stock, next steps following their completion and absorption, would likely need to be important to support the updated Windlesham Neighbourhood Plan.

H6: Specialist Housing

Bagshot

Whist Council understands the need for specialist housing, Bagshot residents are concerned about the excessive number of care homes in their village which in turn is creating an elderly population. Instead, younger families should be encouraged to come to the village. Also, the council need to make it viable and cost effective for our younger generations to stay in the area.

H7: Affordable Housing

The Parish Council supports the approach for affordable housing but would like to know if the first sale figure of no higher than £250,000 stated in 3.101 is subject to change.

It is agreed, all 3 villages need small affordable homes to encourage younger first time buyers, although concerns need to be addressed about locations of suggested housing areas in the plan.

SHBC seems to favour socially rented and we believe it should have the ambition to frame policy that protects the family nucleus and allows children to put down roots where they grew up.

Section 4: Town Centres, Retails and Economy

WPC supports SHBC's plans to develop Camberley Town Centre Primary Shopping Area but we also need support for the businesses and shops serving Bagshot, Lightwater and Windlesham villages.

Our residents are also encouraged that Camberley Town Centre will be the focus of improvement in the Borough, but they also feel that this should not be to the detriment of the villages. "We pay council tax as well. Our villages need improving too" and "We are

expected to take the housing without improvement to facilities and infrastructure” was voiced by many Bagshot residents.

Rural Economy

Windlesham

The Council support this approach in principle, but it is felt that the policy could go further to protect the character of the rural areas which exist around Windlesham village. We share concerns by Chobham Parish council regarding the risk of permanent loss of agricultural, equestrian and other rural sites to general industrial and other commercial uses unsuitable for the rural area and support stronger policies which encourage and prioritise businesses that are rural in character or fit comfortably in a rural area.

We also agree with Chobham PC’s comments regarding commercial sites close to or abutting settlement boundaries as well as within them.

- For any proposal, the development’s design must integrate into its setting, with particular attention to ensuring frontages and views from the public realm remain rural in character.
- Development with a significant number of out-of-hours and/or night operations should be considered to be unsuitable for a rural environment.
- With Windlesham and other rural areas being relatively poorly served by public transport, economic development that would generate a large number of trips and/or not employ mainly local workers should be directed towards more sustainable locations.

District and Local Centres

The Parish Council supports policy designed to invigorate centres and improve their vitality

Unless already secured via an Article 4 Direction, opportunities should be taken to remove permitted development rights to ensure uses remain a good fit for the local centre and the character of the area.

The Parish Council strongly requests that Policy should support improvements to footpaths and roads in and around Windlesham village to provide safe and easy access for pedestrians, cyclists and accommodate persons with mobility challenges to safely access village shops and services.

There is concern that ‘General Permitted Development’ has the potential to bring about decline of current communities.

Section 5: Infrastructure

It is agreed that development brings with it increased demand upon already stretched infrastructure but currently there is little to no financial support for local councils to invest. Of concern are-

Planning conditions- We have seen that, even with large developments such as Deepcut, developers are able to wriggle out of meeting conditions such as Drs surgeries by offering inadequate funding to SHBC to waive the condition and even if Surgeries are delivered, the local Health Care commissions who provide them are struggling to staff them.

Sewers and Fresh water- Water companies are currently not obliged to expand their provision of services to accommodate the thousands more homes being/due to be built. This is unacceptable and should be challenged with central government for investment to be made to expand this important infrastructure if they wish their quota to be met.

There is only a finite amount of fresh water available to an area and it is very noticeable in the last 10 years that streams once flowing are now completely dry .

Bagshot:

Bagshot is not averse to development, but it simply cannot sustain the consequences of it as its arteries, the A30, A322/junction 3 M3 are already beyond capacity and in need of considerable sums of money to decongest them, and simply the mitigations are insufficient to offer the good quality of life the Borough Council promises.

Flood risk_ it is noted that in the Sustainable Appraisal (SA) document supporting the SHBC Draft plan, the 3 scenarios identified (pp 8-11) the Flood risks for the Eastern area of the plan, will add significantly to the infrastructure burden but the SA document and Plan makes no mentions of mitigation having being identified.

For the 3 villages of Windlesham Parish, this is particularly clear for Bagshot whose natural flood plain has now been removed by the development taking place on the site at Chapel Lane. We are therefore concerned that further development in Bagshot, particularly in the Northern section where 3 separate sites for >25 homes are identified, will bring significant disruption to Bagshot and all surrounding areas of Surrey Heath, RBWM and Hampshire which rely on the A30 there and through Windlesham as a key strategic route for traffic

Lightwater:

Any development in Lightwater will be limited due to the very small amount of land the village has available for development, but while we are aware of this, the village is subject to traffic generated from other developments like Deepcut, West End, Windlesham and Bagshot, yet it receives no CIL contribution to mitigate the effects of the traffic those developments generate.

The A322 is at a standstill at any time of day and Red Road is very trafficked with every junction to Lightwater already at capacity. Real concern is expressed for the air quality along those two roads.

Windlesham:

Out of the 3 villages, Windlesham, although a very desirable location, is the village with the least amount of essential infrastructure and arguably the least sustainable location in Surrey Heath.

Windlesham is reliant on neighbouring Lightwater for its Doctor's surgery and Bagshot or Sunningdale for groceries, yet the draft plan suggests 173 new dwellings to be built in the 2019-2038 local plan. This steep rise in dwellings would change the face of a village where resources are already stretched beyond reason and put a heavy toll on the quality of life of local residents.

The main roads in Windlesham village have little or no footpath provision to facilitated safe and easy access around the village by pedestrians. Windlesham village committee are working with Surrey County Council to prepare a consultation for residents on potential improvements to the access within the village and welcome any financial support SHBC can

offer for this and the surrounding areas. Residents of Windlesham have no safe access to the closest neighbouring villages (Lightwater and Bagshot) where the main shops and services (Doctors, Dentists) are located.

- Roads - The roads in and around Windlesham are prone to heavy congestion, particularly with school runs and commuter traffic
- Public transport provision - Windlesham village is poorly served, it has no train station of its own and only one bus service between Staines and Frimley Park Hospital which provides a good morning service to reach Sunningdale station and Charters school (If there is space on the bus and children can obtain bus passes). However, there are only a few buses during the day which provide limited opportunity to attend appointments/go shopping as the timings are either 20 minutes or 4 hours , the final bus of the evening is at around 6pm which is too early for most commuters and provides no opportunity for residents to use public transport for appointments/shopping or to go out in the evening. This provides a heavy reliance on personal vehicles/taxis/getting lifts from friends or family putting more cars on the road which could be avoided.

Section 6: Environment

With regard to section 1.54 of the SHBC Plan, mention is made of the Habitat Regulation Assessment within the supporting document “Sustainability Assessment” (SA), in section 2.5 of the SA specific mention is made that the purpose of a “Habitat Regulation Assessment” *is to ‘identify any areas of the Draft Plan that have the **potential to cause any likely significant effect on Natura 2000 or European Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPA) and Ramsar Sites), either in isolation or in combination with other plans or projects.** This includes the effects of air quality. Where such effects are identified mitigation strategies will need to be devised. The whole of Surrey Heath is within 5km of the Thames Basin Heaths Special Protection Area (SPA) and therefore the Local Plan needs to be subject to HRA.’* The SA was started in 2017 and not yet adopted, but it concludes that there will be ‘no adverse effects of the Draft Plan on the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC regarding recreational pressure, both alone and in-combination. ‘ Since that SA was prepared, vast quantities of development have been undertaken across the borough, higher density of houses with less access to their own gardens and loss of open areas previously accessible to walkers resulting in a noticeable increase of people now congregating to access limited areas of green spaces. The severe Damage to Chobham common from the extensive wild fires, worst one being on 2020, will be compounded by the extra pressure new developments in SHBC and surrounding areas will bring.

Windlesham

Windlesham village is extremely lucky to have a central, Charity run, open space available to residents with their Field of Remembrance. However, since the 2020 lockdowns we have seen a significant increase in the use of this facility which we note is being used by developers to mitigate their developments. We have seen it used in developments as far away as Twickenham, Richmond, Shepperton and others as a convenient local space, easily accessible via the M3/M25/A30.

Section 7: Green Belt and Countryside

The primary objective is to protect our green belt and heritage sites and habitats including the SSI sites.

Section 8: Design and Heritage

WPC supports that new developments will be required to attain a high quality of design that responds effectively to the needs and character of the area, but it hopes SHBC truly knows the character of each village to ensure this is achieved.

Lightwater

One councillor commented- The first paragraph in the Draft Local Plan sets the scene for what follows:

“Ensure development complements the generally Victorian and Edwardian character of Lightwater, by providing good quality development in accordance with design policy DH1 Design Principles.”

Who has driven through Lightwater beyond the Guildford Road will know that there is no such thing as Victorian and Edwardian character? The Briars Estate, which changed the face of the village in the mid-1980s, is predominantly mock Tudor, Ambleside and Macdonald Rd have no defining style, and other parts have a Georgian feel or brick building dwelling feel in keeping with the 1980s development styles. It is therefore difficult to read the rest of the document with anything other than a very critical eye.

Additional comments on the consultation process:

A Local Plan is a document which sets out planning policy to shape development.

The government requires Local Planning Authorities to review it every 5 years, and the planning authorities are asked to consult residents about the need and how development might shape their communities.

Surrey Heath organised a series of public events, but failed to consult statutory consultees, like Windlesham Parish Council and instead decided to hold events for residents Associations together with the parishes.

When WPC raised this issue, SHBC responded with a standard response, previously seen on social media as the same response was shared with a borough councillor.

This highlighted, not only SHBC's lack of interest and in the villages, but its lack of understanding that Parish Councils are a statutory authority with elected members and they have a right to be consulted as statutory consultees. SHBC seems to have failed to understand this point by bundling a statutory authority with non-elected resident's groups.

Further to this, WPC is the only village in Surrey Heath to have a made Neighbourhood Plan defining how the future of development in Windlesham village should be shaped. A failure to engage with Windlesham by the planning authority is a failure to understand the process.

Further, we note that the Windlesham Borough Councillors again engaged with the Windlesham Society to hold a public meeting and completely bypassed the statutory consultee that is the Parish Council. So, it is this Council's opinion that the consultation conducted by SHBC and its representatives was perfunctory as it lacked any real interest in engaging with other statutory bodies with an actual mandate.