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Sent by email
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7th July 2026

Dear Sir/Madam,

Consultation on Main Modifications to the Surrey Heath Local Plan 2019 – 2038

Thank you for consulting Surrey County Council (SCC) on the Surrey Heath Local Plan 2019-2038 Proposed Main Modifications Consultation. This is an officer response reflecting the council's statutory responsibilities in relation to highways and transport and the council's role as the responsible authority for historic environment planning.

Transport Development Planning

We note the proposed modifications to the following policies:

- HA1/01 - Bagshot Depot and Archaeology Centre, London Road, Bagshot - 50 units (page 10)

Proposal to delete (c), the requirement for development proposals to provide improved pedestrian and cycle access from the site to Bagshot District Centre.

- HA1/02 - Camberley Centre, France Hill Drive, Camberley - 35 units (page 11-12)

Proposal to delete (e), the requirement for development proposals to provide improved pedestrian and cycle access to Camberley Town Centre from the site.

- HA1/26 - Pinehurst, 141 Park Road, Camberley – Extra-care development (pages 21-22)

Proposal to delete (e), the requirement for development proposals to provide suitable pedestrian and cycle access from the site to create linkages to Camberley Town Centre.

The reason given by the Planning Inspector for deleting these requirements is: *“There are no specific pedestrian and cycle improvements that are envisaged as being necessary”*.

We consider that it is too early to determine that there are no necessary pedestrian and cycle access improvements for these specific development sites.

The Transport Development Planning team seeks pedestrian and cycle improvements within developments and/or on the surrounding highway network, to promote sustainable travel and to reduce reliance on the private car, in line with the policies and objectives of the NPPF, LTP4, and Healthy Streets for Surrey.

Paragraph 115 (a) of the NPPF specifically states: *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location.* Paragraph 117 (a) also states that applications for development should *“give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas”*.

Transport Development Planning often seeks the provision of off-site pedestrian and cycle access improvements, where they are considered necessary and relevant to a development, such as the provision of new or widened footways, new or improved pedestrian crossing facilities, and new or extended cycle lanes. We would be concerned that deleting the requirement to provide improved pedestrian and cycle access will restrict our ability to request any such improvements from the developers of these allocated sites.

Historic Environment Planning

We note that Policy DH7 has been significantly reduced on the basis that elements duplicate national policy. Whilst unnecessary repetition of the NPPF should be avoided the proposed changes remove all policy wording that overlaps with national policy, resulting in a heritage policy that is heavily reliant on the NPPF to function. This approach risks creating gaps in the development plan, particularly given ongoing changes to national planning policy.

There are elements of the deleted text, including the positive strategy for the conservation and enhancement of heritage assets, that appear to go beyond simple duplication and provide important local policy context.

For example, the removal of paragraph 1 *“Proposals for development that affects heritage assets (designated and non-designated) will be supported where they conserve and enhance the significance, special interest and character and appearance of the heritage asset and its setting.”* removes elements of a “positive strategy for the conservation and enjoyment of the historic environment” which is set

out as a requirement in the NPPF paragraph 203. We therefore recommend that this paragraph be restored in line with the requirement set out in NPPF paragraph 203.

The removal of paragraphs 4-7 mean that designated heritage assets are removed from the plan and Surrey Heath are reliant on what is set out in the NPPF. Deleted paragraph 4 sets out a “positive strategy” for the treatment of designated heritage assets within the planning process, which is not restated in national policy. Additionally, we note that treatment of Designated heritage assets across the plan is inconsistent as policy regarding Conservation Areas remains.

In paragraph 7 we recommend that the newly inserted statement “*an archaeological evaluation should be submitted*” should be amended to “*the results of an archaeological evaluation should be submitted*” in order for the terminology to remain consistent with paragraph 6.

Additionally, the proposed new inserted paragraph 8.80 uses inconsistent terminology as it refers to “*Buildings at Risk*”, then “*heritage assets that may be at risk*”. Not all heritage assets are buildings, and this terminology is inconsistent with modern heritage protection national planning and practice and Historic England Guidance. We would therefore recommend that the paragraph be altered to only refer to “*Heritage Assets at risk*” throughout.

If you require further information, please contact Anna Bird at

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Yours sincerely,

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