

	Surrey Heath Borough Council Surrey Heath Local Plan (2019 – 2038) Main Modifications Consultation Response Form	Ref: (For official use only)
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Please return:

By email: planning.consultation@surreyheath.gov.uk

OR

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

By 9th July 2026 at 12:00 noon

NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:

Part A – Personal Details- need only be completed once.

Part B – Your representation(s). **Please fill in a separate sheet for each representation you wish to make.**

Surrey Heath Borough Council's Privacy Statement is [here](#)

Background

The Surrey Heath Local Plan 2019-38 was submitted to the Secretary of State for examination in December 2024. Subsequent Examination in Public hearing sessions were held between 16th September 2025 and 8th December 2025.

As a result of the examination thus far, the Planning Inspector appointed to examine the Local Plan has recommended a number of Main Modifications to make the plan sound and legally compliant.

These are shown on the Schedule of Main Modifications that has been published for consultation. These have been subject to a further Sustainability Appraisal and Habitats Regulation Assessment.

The Main Modifications are proposed without prejudice to the Inspectors' final conclusions which will take account of all representations submitted in response to this consultation.

The Council will send responses to the consultation directly to the Inspector by the Council for review.

Part A

You must provide your contact details. We are unable to accept anonymous comments. The names of respondents and submitted comments will be submitted to the inspectors and published on the Council's examination website. Personal information such as telephone numbers, addresses, and email addresses will not be published.

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
First Name	Trefor	
Last Name	Hogg	
Job Title		
(where relevant)		
Organisation		
(where relevant)		
Address Line 1		
Line 2		
Line 3		
Post Code		
Telephone Number		
E-mail Address		

Please note that your formal comments (known as representations) and your name will be made available on the Council's website. All other details in Part A of this form containing your personal details will not be shown.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B – Representations

Please note:

- Representations should only relate to Proposed Main Modifications, Map Changes or the associated addenda of the Sustainability Appraisal and/or Habitats Regulations Assessment, and not to other aspects of the Plan.
- This is not an opportunity to repeat or raise matters that were or could have been part of earlier representations or hearings on the submitted Plan.
- In your representation you should succinctly provide all the evidence and supporting information necessary to support your representation and your suggested modification(s).
- You should not assume that you will have a further opportunity to make submissions.
- Please use a separate sheet for each representation

Part B – Please use a separate sheet for each representation

Name or Organisation:	
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3. To which Main Modification does this representation relate?

Main Modification Reference Number:	MM17
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4. Do you consider the Main Modification is:

4.(1) Legally compliant
(delete as applicable)

No

4.(2) Sound
(delete as applicable)

No

5. Please give details of why you consider the Main Modification does not assist in achieving legal compliance or soundness or provide any other comments. Please be as precise as possible.

The paragraph on parking is vague and incapable of validation: It is therefore unsound.

It is also unsound due to the lack of provision for residents and their visitors who will need to be able to park their vehicles. The lack of parking provision will result in very substantial nuisance parking across the town centre and the surrounding residential areas adding to the current severe problems with nuisance parking. Sufficient parking is required to meet the test of soundness and that provision must be at a level over and above Surrey County Council's very minimal parking standards.

It is not legally compliant with a number of legal obligations, including:

- the [Equality Act 2010](#) including the [Public Sector Equality Duty](#)
- [Best Value Duty 2011 guidance](#)
- [Localism Act 2011](#)
- the [Human Rights Act 1998](#)

The reason being the lack of provision for the disabled in breach of the above legislation.

"k) the retention of existing bus stops at Knoll Road and support for accessible and well-connected bus services to Knoll Road; well-integrated car and cycle parking provision in accordance with having regard to Surrey County

Council's parking standards and reflecting the town centre location;"

6. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Main Modification must specify parking that is sufficient for the number of dwellings and makes appropriate provision for disabled persons in order to be both sound and legally compliant. Suggested wording below

"k) the retention of existing bus stops at Knoll Road and support for accessible and well-connected bus services to Knoll Road; well-integrated car and cycle parking provision substantially in excess of Surrey County Council's minimal parking standards and reflecting the town centre location which precludes the availability of on-street parking, including provision of at least twenty disabled parking bays close to the buildings entrances provided in such manner as to be fully accessible by disabled users."

7. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification?

No

Part B – Please use a separate sheet for each representation

Name or Organisation:	Trefor Hogg
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3. To which Main Modification does this representation relate?

Main Modification Reference Number:	MM27
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4. Do you consider the Main Modification is:

4.(1) Legally compliant
(delete as applicable)

No

4.(2) Sound
(delete as applicable)

No

5. Please give details of why you consider the Main Modification does not assist in achieving legal compliance or soundness or provide any other comments. Please be as precise as possible.

Library authorities (unitary, county or metropolitan borough councils) have a statutory duty under the [Public Libraries and Museums Act 1964](#) to provide a comprehensive and efficient library service for all persons who live, work or study in the area. Proposals to remove a Library without requiring that its replacement is first provided in accordance with the legislation before the Library can be removed are therefore likely to cause the applicable Library Authority to be in breach of the legislation.

Removing the much-used Theatre without first replacing it would significantly damage the commercial prospects for its replacement as theatres among other things depend on continuity of operation to attract their clientele.

6. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to comply with the applicable legislation and to deliver a sound proposal reword m) as below:

m) relocates civic uses, the library and/or Camberley Theatre to more central locations should opportunities arise within the town centre. With the proviso, that their replacements must be fully established before removing the existing facilities, and that such replacements must deliver equivalent or significantly better levels of provision which fully take into account the increasing numbers of persons who are expected to live, work or study in the area ; and,

7. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification?

No

Part B – Please use a separate sheet for each representation

Name or Organisation:	Trefor Hogg
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3. To which Main Modification does this representation relate?

Main Modification Reference Number:	MM16
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4. Do you consider the Main Modification is:

4.(1) Legally compliant
(delete as applicable)

No

4.(2) Sound
(delete as applicable)

No

5. Please give details of why you consider the Main Modification does not assist in achieving legal compliance or soundness or provide any other comments. Please be as precise as possible.

The modification talks about the Mix of Uses for the London Rd block including “commercial, retail, leisure, healthcare uses, cultural, civic and community uses appropriate for the town centre location, with active frontages at ground floor level as appropriate, to support the viability and vitality of Camberley Town Centre;” The wording is vague and does not specify a measure capable of being validated. It is therefore unsound. “o) suitable, well integrated parking provision having regard to Surrey County Council’s parking standards.”

The residential, commercial, retail, leisure and other uses envisaged would not be viable financially without a means for Residents, Visitors and customers to park and visit the buildings / surrounding area. Residents and visitors will need to be able to park their vehicles, and the lack of parking provision would result in very substantial nuisance parking across the town centre and the surrounding residential areas adding to the current severe problems with nuisance parking. Sufficient parking is therefore required to meet the test of soundness and that provision must be at a level over and above Surrey County Council’s very minimal parking standards.

In order to deliver the envisaged range of uses on the ground floor of each block, in a viable and commercial manner it will be essential that they have access to

sufficient parking for their customers and visitors. Failure to provide sufficient parking for residents and their visitors will result in increases in nuisance and illegal parking which is not a sound proposal.

To comply with the Public Sector Equality Duty and the Equality Act 2010 It is also necessary that parking provision allows sufficient spaces for disabled customers / visitors together with short stay and drop-off spaces in close proximity to the proposed commercial, retail, leisure, healthcare and other uses to prevent competition between visitors and the disabled for parking spaces.

Without adequate parking provisions the proposed modification would fail to comply with a number of legal obligations, including:

- the [Equality Act 2010](#) including the [Public Sector Equality Duty](#)
- [Best Value Duty 2011 guidance](#)
- [Localism Act 2011](#)
- the [Human Rights Act 1998](#)

6. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to provide the required soundness and legal compliance amend as per below:

Transport Infrastructure

- l) a better experience for all transport modes in the town centre, in particular for walking and cycling to include improved pedestrian and disabled accessibility between the High Street, Park Street, London Road and The Square shopping centre;
- m) improved transport infrastructure at the London Road gateway including provision of a new bus stop, improved pedestrian and cycle links along the London Road, the provision of a taxi rank and a short-stay dropoff/pick-up point in addition to on-street disabled parking sufficient for at least thirty users close to the proposed ground floor uses ;
- a) improvements to the London Road junctions with the High Street and Park Street and the creation of pedestrian friendly areas adjacent to Obelisk Way and the High Street;
- n) appropriate accesses for service vehicles that are convenient for use but designed discreetly to ensure they do not detract from the attractiveness of the new development;

o) suitable, well integrated parking provision that provides 1.5 long term parking spaces per dwelling and a further 100 short stay spaces to provide parking for the commercial, retail, leisure, healthcare and other ground floor uses proposed

7. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification?

No