

Appeal Decision

Hearing Held on 8 January 2020

Site visit made on 8 January 2020

by Benjamin Webb BA(Hons) MA MA MSc PGDip(UD) MRTPI IHBC

an Inspector appointed by the Secretary of State

Decision date: 23 January 2020

Appeal Ref: APP/D3640/W/19/3235041

Castle Grove Nursery, Scotts Grove Road, Chobham, Woking GU24 8DY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Bewley Homes PLC against the decision of Surrey Heath Borough Council.
 - The application Ref 18/1118, dated 21 December 2018, was refused by notice dated 1 July 2019.
 - The development proposed is the erection of residential development of 40 dwellings (including 4No one bedroom, 17No two bedroom, 7No three bedroom, 12No four bedroom units), with parking, landscaping and access following demolition of the existing plant nursery.
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Decision

1. The appeal is dismissed.

Procedural Matters

2. The application form gives the name of the agent as the applicant. The Council however confirmed at the Hearing that understood Bewley Homes PLC was in fact the applicant, and the appeal is indeed proceeding in that name.
3. The description of the proposed development was changed during the Council's determination of the application, and this was agreed between the parties. The description in the banner heading above is the therefore the revised version, rather than that given on the application form.
4. Immediately prior to the Hearing the Council withdrew its reasons for refusal relating to the Thames Basin Heaths Special Protection Area (the SPA) and affordable housing. This followed receipt of a Unilateral Undertaking (UU) addressing each matter, which I will consider further, as appropriate, below.

Main Issues

5. The main issues are:
 - whether the development would be inappropriate in the Green Belt;
 - the effect of the development on the openness of the Green Belt;
 - the effect of the development on the purposes of including land within the Green Belt;

- the effect of the development on the character and appearance of the area;
- whether the site is a suitable location for residential development with regard to access by future occupants to services, facilities and employment by means other than private vehicles; and
- if the proposal would be inappropriate development, whether harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify it.

Reasons

Whether the proposed development would be inappropriate

6. The site is located within the Metropolitan Green Belt. The Core Strategy and Development Management Policies 2011-2028 Adopted 2012 (the CS) contains no policies which specifically outline criteria for assessing proposals within the Green Belt. In this regard the CS defers consideration to Planning Policy Guidance 2: Green Belts (PPG2), which has since been superseded by the National Planning Policy Framework (the Framework). Accordingly, and in line with paragraph 6.2 of the CS, the Council assessed the proposal on the basis of current national policy applicable to Green Belts set out within the Framework.
7. Paragraph 145 of the Framework states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions are however set out in paragraphs 145 and 146. In this context both main parties agree that the proposed development would meet none of these exceptions. This includes in relation to redevelopment, as the site falls outside the Framework definition of previously developed land, and also building replacement. I concur.
8. For the reasons outlined above I conclude that the development would be inappropriate in the Green Belt. Inappropriate development is by definition harmful to the Green Belt, and paragraph 144 of the Framework indicates that substantial weight should be given to any such harm. I therefore attach substantial weight to the harm that the development would cause by reason of its inappropriateness.

The effect on openness

9. The site is largely covered by horticultural glasshouses which have been until recently, and indeed partly remain, in use by a nursery. Both main parties agree that these buildings are agricultural buildings. I agree.
10. 'Buildings for agriculture' fall within the list of exceptions set out in paragraph 145 of the Framework. As such they are not inappropriate within the Green Belt. This exception implicitly takes into account the effects of such development on the openness of the Green Belt. The glasshouses on site are therefore of a type of building whose effect on the openness of the Green Belt is acceptable in principle, regardless of considerations of size or appearance.
11. Despite both this, and the fact that the proposed development would be inappropriate in the Green Belt, the appeal scheme has been promoted on the basis that its built-form would occupy less space than the glasshouses, and thus that it would have a less impact on the openness of the Green Belt.

However, in this context effects on openness cannot be ascertained with reference to those of the existing development on site, given the latter are, by definition, acceptable. Indeed, were I to take the contrary view, it would undermine the logic underpinning national policy as set out within the Framework. It is therefore necessary to consider the effects of the proposed development in its own terms, and on its own merits.

12. The site is a long strip of land, the immediate setting of which comprises a mix of fields, other nursery buildings, and residential dwellings. The latter are predominantly of inter-war suburban type, and form part of a distinct cluster comprising cul-de-sacs and ribbons along and adjacent to Scotts Grove Road and Guildford Road. This cluster is separated from the outskirts of the main developed area of Chobham by fields, and is thus readily perceived as a suburban incursion into the open rural setting of Chobham.
13. The boundaries of the site are well screened by vegetation. It is nevertheless clear from outside the site, and in views from Scotts Grove Road in particular, that it does not currently contain housing.
14. The proposed development would entail the construction of 40 dwellings, including garaging, and plot boundaries. These solid built forms would have a permanent physical and visual presence, and would collectively occupy a significant amount of space across the site. Perception of the solidity and mass of these built forms would be accentuated by their height, and the minimal size of the gaps provided between buildings along much of the developed frontage within the site. It would be further increased by the proposed level of external parking provision, associated vehicle movements through the site, and by other domestic paraphernalia which would inevitably accumulate over time.
15. As emphasised by the appellant's landscape assessment, the proposed development would retain most of the current screening of the site, and this screening could be increased over time as part of the scheme landscaping. The development would however be visible from outside the site via the access, and would be experienced upon accessing and moving around the site itself.
16. In this context a direct visual relationship between the development and the wider cluster of suburban housing within the setting of the site would be readily perceived. The development would indeed be viewed as an expansion of the existing suburban cluster into space which is currently in both obvious and contrasting agricultural use. The visual association would emphasise the loss of space in cumulative terms, and would be highlighted by the continued agricultural use, and greater openness of adjacent land.
17. In both spatial and visual terms therefore, the development would have an appreciably erosive effect on the openness of the Green Belt.
18. For the reasons outlined above I conclude that the development would cause significant harm to the openness of the Green Belt. In view of paragraph 144 of the Framework, I attach substantial weight to the harm that would be caused.

Purposes of including land

19. Paragraph 134 of the Framework states that the Green Belt serves 5 purposes. Clearly not all are relevant at every site in every location.

20. Chobham is 'washed over' by the Green Belt designation. Policy DM2 of the CS however makes a distinction between the main developed area of Chobham, and outlying areas of the settlement for development management purposes. Though reflecting now expired guidance in PPG2, this nonetheless indicates that the designation was not casually applied.
21. In this regard the role played by the Green Belt designation within the main developed area of Chobham, and within the land outside it clearly differs. Indeed, in view of the rural setting of the suburban cluster of development adjacent to the site, and its detachment from the main developed area of Chobham, the Green Belt here plays an important role in restricting further scope for expansion or encroachment of suburban housing into the surrounding countryside. Assisting in safeguarding the countryside from encroachment is the third purpose of the Green Belt set out in paragraph 134 of the Framework.
22. The site is well screened and contains agricultural buildings. However this does not negate the contribution that it makes towards serving the above purpose. Indeed, many such agricultural sites can be identified throughout the countryside, as they are an intrinsic aspect of its character. In this regard the fact that such development is classified as not inappropriate within the Green Belt is indicative of the compatibility of buildings for agriculture with the fundamental aim, and essential characteristics and purposes of the Green Belt, as set out within paragraphs 133 and 134 of the Framework.
23. The site is located adjacent to existing residential development. However, the site serves to contain this residential development. Its proximity does not therefore negate the contribution the site makes to serving the above purpose.
24. In view of my reasons above the proposed development of the site would have a markedly suburbanising effect upon its rural setting. This would clearly be at odds the third purpose the Green Belt as set out above.
25. The appellant additionally states that the development would assist in urban regeneration, consistent with the fifth purpose of the Green Belt set out in paragraph 134 of the Framework. However, the land is not urban, and nor is it classified as previously developed. The scheme cannot therefore be logically viewed as involving urban regeneration.
26. For the reasons outlined above I conclude that the development would conflict with the third purpose of including land within the Green Belt. This conflict would cause significant harm. In view of paragraph 144 of the Framework, I attach substantial weight to the harm that would be caused.

Character and appearance

27. Housing within the setting of the site generally consists of bungalows and 2-storey dwellings. These are regularly set back from the street frontage behind reasonably large front gardens. This, and the strongly linear character of the layout, provides existing residential development with a reasonably consistent and spacious feel, typical of suburban areas.
28. Woodland and fields occupy portions of the street frontage towards both end of the developed area along Scotts Grove Road. These provide an important visual and physical connection to the broader landscape, both underlining the predominantly open rural character of the surrounding area, and the limited spatial extent of the existing cluster of suburban development within it.

29. The residential frontage on the northern side of Scotts Grove Road is further broken by the site and the adjacent nursery, the buildings on which clearly contrast with adjacent housing. The glasshouses on site are both large and functional in appearance, but they are of light-weight and largely transparent construction. They are appreciably agricultural in character, and in this context, they both complement and reinforce the rural character of the surrounding setting. Notwithstanding the movements of lorries to and from the site in association with the nursery business, there is little sense therefore that the existing development, or its use, either causes or has caused any harm to the character or appearance of the surrounding area.
30. The proposed development would obviously relate more directly to existing housing adjacent to the site than the glasshouses do at present. The proposed linear arrangement of dwellings along the south west side of the site, and along the Scotts Grove Road frontage would indeed generally correspond to that of existing residential development adjacent. However, the more irregular layout of buildings on the rest of the site would not.
31. Site density would also be at the highest end of that seen locally, and this would be most evident in the modest to minimal set back of many dwellings from the proposed street frontages within the site. The relatively high level of density would be accentuated by the presence of terraced dwellings and use of parking courts, neither of which is a typical feature within the surrounding streetscene. Notwithstanding the provision of public open space, the layout would therefore appear less spacious, and less uniform in character than existing residential development within the setting of the site. This would limit the extent to which the development would achieve integration.
32. I have already found that the replacement of the glasshouses with housing would itself have a suburbanising effect on the rural setting of both existing residential development, and that of the main developed area of Chobham itself. Indeed, this finding is reinforced by my assessment above, and would be clearly appreciable on the ground. The suburbanising effect would extend to the proposed hard surfacing of the footpath linking Scotts Grove Road with Guildford Road (footpath 7). In each regard the development would harmfully erode the rural character of the area.
33. For the reasons outlined above I conclude that the development would cause unacceptable harm to the character and appearance of the area. It would therefore conflict with Policy DM9 of the CS which requires development to respect and enhance the local, natural or historic character of the environment be it in an urban or rural setting, which are broadly consistent with general provisions related to design set out within the Framework. I attach significant weight to the harm that would be caused.

Location

34. Policy CP1 of the CS seeks to 'largely' direct development to previously developed land in the western part of the Borough. The Council confirmed at the Hearing that this strategy is partly informed by the Green Belt designation, and thus the reasonable assumption that scope for development within the Green Belt will be limited. In this context the policy indicates that there is limited capacity for development in Chobham. As noted above, Policy DM2 of the CS further makes a distinction between the main developed area of Chobham, and outlying areas such as that within the site is located. However,

- neither of these policies, nor any other development plan policy, specifically precludes development at the location in question.
35. At a more general level, Policy CP11 of the CS requires development to reduce the need to travel and to promote sustainable modes of transport. Policy CP2(i) of the CS further requires development to contribute towards a reduction in carbon dioxide emissions. Each is generally consistent with the objective of achieving environmentally sustainable development set out within the Framework. In this context the Council's principal concern is that future occupants of the development would be reliant on private vehicles to access facilities, services and employment, causing environmental harm.
36. The nearest shop is located immediately adjacent to the site. This apparently provides a limited range of produce, but it could be easily accessed on foot by future occupants of the development. Chobham itself is designated as a 'local centre' by the CS, and contains a broad range of facilities, services and these presumably provide a source of employment. As noted above, the site and surrounding development lies outside the main developed area of the settlement. The two are however linked by a pavement which runs along Scotts Grove Road and Castle Grove Road. The walk does not take long and does not involve challenging terrain. The route would be quick and easy to cycle.
37. I acknowledge that the condition of the pavement is poor in places, and that its width varies. Lighting is present but not continuous, and it is necessary to cross Guildford Road/Castle Grove Road, which is at times very busy. There is also a generally high level of exposure of pedestrians to passing traffic along much of the route. All may currently discourage use of the pavement to access Chobham. This would remain the case even with the modest improvements agreed between the appellant and the Highways Authority (HA), which could all be secured by condition. I consider that the pavement would nonetheless provide a reasonably convenient means by which occupants of the development could gain access Chobham. Though safety concerns are expressed by interested parties, I note that these are not shared by the HA who have carried out a safety audit. I see no reason to reach a different view.
38. Bus services pass along Guildford Road, where they can be hailed. These services could be used by future occupants of the development to gain access to shops, rail services and a local school. Access to stopping points can be achieved along footpath 7, the improved surfacing of which has been agreed between the appellant and the HA. Both this, and formalisation of bus stopping points can be secured by condition. Though the path is not lit or overlooked, and could be obstructed by unkempt boundaries if not maintained, the improvements would make use of the bus service more likely than otherwise.
39. Paragraph 103 of the Framework states that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and that this should be taken into account in decision-making. In this context, I consider that the level of bus service is reasonable for the location, and despite the limitations on access to Guildford Road, the buses would see some likely use by future occupants of the development.
40. In the event that private vehicles were instead used to access Chobham, the fact that the distance involved is very short would mean that the level of any environmental harm caused would be very limited.

41. For the reasons outlined above I conclude that there is a suitable location for residential development with regard to access by future occupants to services, facilities and employment by means other than private vehicles, and that no unacceptable environmental harm would be caused in this context. The development would therefore comply with Policy CP11 of the CS, as outlined above, and Policy CP2(i) of the CS, as also outlined above.

Other considerations

(a) Openness

42. As outlined above, the appellant states that the appeal scheme would improve the openness of the Green Belt. This is because the built form of the proposed development would occupy significantly less space in terms of volume, footprint and spread, than the glasshouses. This matter is not contested, and, setting aside obvious qualitative differences, I see no reason to question the figures presented. I also acknowledge that the Council has approved similar developments in the past on this basis. However as also outlined above, given that the glasshouses are a building type which is not inappropriate in the Green Belt, and whose effects on openness are implicitly acceptable, such a comparison cannot form a legitimate basis to justify development which would itself be inappropriate, and which would further conflict with the third purpose of designation. To do so would undermine the function and robustness of the Green Belt. I cannot therefore attach any weight to the claimed improvement of openness as a consideration in favour of the appeal scheme.

(b) Affordable housing

43. Policy CP5 of the CS sets out a requirement for developments involving 15 dwellings or more to contribute 40% affordable housing according to a split set out in Policy CP6 of the CS. The development would deliver a policy compliant 16 affordable units, which have been secured within the UU. I am satisfied that in this regard the UU meets the tests set out in paragraph 56 of the Framework and Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) (the relevant tests).
44. Though the main parties dispute the level of need for affordable housing within the Borough, the Council confirmed at the Hearing that regardless of the measure used there has been a shortfall in the delivery of affordable housing in the recent past. The scheme would thus help to address a significant need.
45. The provision of affordable housing is a benefit which I generally consider should attract great weight. In this case however I have taken into account the fact that paragraph 145 (f) of the Framework sets a specific exception for the provision of affordable housing within the Green Belt, which the scheme would not meet. There is otherwise nothing remarkable in the scheme's policy compliant level of affordable housing provision. This being so I attach only moderate weight to the benefit of the scheme's provision affordable housing.

(c) Housing supply

46. At the time the application was determined both main parties agreed that the Council lacked a demonstrable 5-year supply of deliverable housing sites (5yHLS). Subsequently, in October 2019 the Council published its Interim 5 Year Housing Land Supply 2019-2014 Addendum Report (IAR). This indicates a supply of 5.52 years. Having regard to the definition of deliverability in the

Framework Glossary, and further guidance on ways in which this can be demonstrated in the Planning Practice Guidance, the appellant contests the evidence underpinning the IAR. In this regard the appellant claims that the 5yhl figure is in fact 4.52 years; a shortfall of 0.48 years, or 169 units.

47. At the Hearing the main parties disagreed on whether it was correct to consider evidence postdating publication of the IAR in consideration of the deliverability of the sites it identifies. Evidence postdating publication of the IAR cannot have formed a basis for the assessment it contains. However, it nonetheless provides some indication of the robustness of the supply figure presented within the IAR. For this reason, and given that both parties have cited such evidence, I have taken it into account for the purposes of this appeal.
48. The Council conceded at the Hearing that 5 of the prior notification sites it listed in the IAR, referred to as White House, 31 High Street, 4 High Street, Higher Park Farm and 111 Deepcut Bridge Road, should not have been included due to their previous expiry. It also conceded that 2 other prior notification sites referred to as 1a High Street, and 52 Park Street, had been completed before publication of the IAR. Thus the 24 units these sites account for should not have been included in the Council's 5yhl figure.
49. Three other prior notification sites involving office conversions which are yet to be implemented, referred to as Building B Riverside Way, Seal House and 6-8 High Street, are now much closer to their expiry date than they were in October 2019. Time remaining falls in the range of around 2-8 months. All are also being marketed for office use. With regard to the respective sizes of the schemes in question, some reasonable doubt thus exists that the 72 units in question will be delivered in the limited time now available to complete the works. I have therefore omitted them from my calculation.
50. Further time has also passed in relation to 3 units approved as part of a larger scheme at Coleford Bridge Road and Grange Nurseries in 2016, which has long since otherwise been completed, with no apparent evidence available of when they might be built. I have therefore also omitted these from my calculation.
51. The Council has however provided details which indicate that firm progress has recently been made towards submission of a reserved matters application relating to a 140 unit scheme approved at Heathpark Wood. I also see little reason to doubt the deliverability of 30 units on an allocated Council-owned site at London Road, given the Council's obvious interest in this scheme.
52. The Council also explained steps made towards securing a legal agreement in relation to 15 units at land south of Beach House. Notwithstanding a long history of outline applications, this again demonstrates firm progress.
53. The appellant claimed that the Council's inclusion of a windfall allowance involved partial double counting of sites already included. However, I am satisfied with the Council's explanation that this allowance was made in respect of future permissions. Double counting was not therefore possible. As such the allowance should not be reduced by the 27 dwellings claimed.
54. At the time of the Hearing a Committee decision regarding an application for a 44 unit scheme on an allocated site at Woodside was imminent. This was subsequently refused. I have not been provided with details of why, or whether the issues can be resolved within the applicable timeframe. Even setting this

site aside however, on the basis of the evidence currently before me, I find that the IAR demonstrates a 5yhls which reliably totals at least 5.15 years. It thus meets the requirements of national policy.

55. Even in the event of a shortfall, the tilted balance set out in paragraph 11 of the Framework would not have been applicable within the current decision making context. Moreover, a modest shortfall of the extent claimed would not in itself have added weight sufficient to justify the harm that the scheme would cause to the Green Belt. As I have found that no shortfall exists, no additional weight attaches to the benefit of the scheme's general provision of housing, and in particular the 24 open market units not already considered above. In this regard, taking account of the objective to significantly boost the supply of housing set out in paragraph 59 of the Framework, I attach little weight to the benefit of scheme's general provision of housing.

(d) Efficient use of land

56. My attention has been drawn to the objective set out in Policy CP2(iv) of the CS to ensure that all land is used efficiently. This reflects the objective set out in paragraph 117 of the Framework to promote an effective use of land in meeting the need for homes. Policy CP2(iv) of the CS however sets efficiency within the context of respecting and enhancing the quality of the environment. Paragraph 122 of the Framework similarly sets the broader objective of efficient use of land within the context of maintaining an area's prevailing character. Given the harm that I have found would be caused to the character and appearance of the area and to the Green Belt above, the appeal scheme would fail in these regards. Claimed efficient use of land does not therefore attract weight in favour of the appeal scheme.

(e) Play area and highways works

57. The provision of a play area and highways works are presented as benefits of the scheme by the appellant. However, the play space would be located well within the development, and provided in order to meet a need specifically generated by its occupants. It would therefore provide little benefit to the broader community.
58. Pavement and footpath upgrading, and the provision of crossing points and bus stop poles are all necessary to better connect the development to Chobham, and to existing public transport infrastructure. It is likely that these improvements would be of some broader benefit to the community. However, taking into account the fact that these improvements are required to help to mitigate any environmental harm that might arise from the development in their absence, I attach little weight to the benefit.

(f) Vitality

59. The appellant states that the development would benefit local vitality. I have indeed found that future occupants would be likely to access and make use of local services and facilities. They could also play a social role within the broader community. The size of the development is such that the benefit would be small. The benefit must additionally be set against the fact that the established use of the site itself holds some value as a contributor to local vitality, even if it is not fully operational at present. I therefore attach little weight to the contribution that would be made by the development towards local vitality.

(g) *European sites*

60. Considered both alone and in combination with other plans and projects, the development would have a significant effect on the integrity of the Thames Basin Heaths Special Protection Area (SPA). This would be due to a likely increase in recreational use of the SPA, leading to degradation of the heathland and forestry it contains, and resulting in disturbance of the 3 species of bird this supports, and for which the SPA was designated. As the conservation objectives for the SPA focus on the maintenance and restoration of habitat and bird population levels, the development would conflict with these objectives.
61. The need for contributions to mitigate such effects is set out within Policy CP14B of the CS, and the Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document 2019. Mitigation is achieved through Community Infrastructure Levy and/or developer payments secured by planning obligations, and spent on site access management and monitoring measures (SAMMs), and strategic suitable alternative natural greenspaces (SANGs). The appellant's UU makes provision for a policy compliant payment, which both Natural England and the Council have confirmed meets their requirements. I am satisfied that in this regard the UU passes the relevant tests, and that the UU allows me to conclude that the development would not adversely affect the integrity of the SPA.
62. In this context the appellant has indicated that the SPA payment should be considered as a benefit of the development. However, regardless of whether or not the recipient SANG is or would be used by other people, this clearly cannot be the case. This is because the payment is required to neutralise an adverse effect on the SPA, and in this regard it does no more than this. Furthermore, without mitigation the development would be in breach of the Conservation of Habitats and Species Regulations 2017. As such I cannot attach any weight to the SPA contribution as a consideration in favour of the scheme.

Planning Balance and Conclusion

63. I have found that the proposal would constitute inappropriate development within the Green Belt. It would furthermore cause significant harm to the openness of the Green Belt, and to the third purpose of including land within it. I have attached substantial weight to the harm that would be caused. In addition, I have attached significant weight to the harm that would be caused by the development to the character and appearance of the area.
64. In this case, the combined weight of the harm identified would not be clearly outweighed by the moderate collective weight of the other considerations advanced in favour of the scheme. These other considerations are therefore insufficient to demonstrate the existence of very special circumstances necessary to justify approval of the appeal scheme.
65. The scheme would conflict with the development plan, and material considerations otherwise indicate that planning permission should be refused. I therefore conclude that the appeal should be dismissed.

Benjamin Webb

INSPECTOR

APPEARANCES

For the Appellant

Jim Bailey BA(Hons) MRTPI	Pegasus Group
Matthew Good	Pegasus Group
Heather Sargent	Landmark Chambers
Chris Saunders IEng FIHE	Motion
Jon Seymour	ACD Environmental

For the Local Planning Authority

Chris Kirk	Surrey Heath Borough Council
J Neill	Landmark Chambers
Neil Praine	Surrey Heath Borough Council

Interested Parties

David Jordan	Scotts Grove Close Residents Association
Victoria Wheeler	Borough Councillor
Sandra Jefferies	Local resident
Chrissie Eggleton	Local resident
Raul O'Meara	Local resident

Documents Presented at the Hearing

- (1) Email with details of links to Mouseprice and Rightmove webpages in relation to 52 Park Street and 1a High Street.
- (2) Excerpt from the draft Surrey Heath Authority Monitoring Report 2018-19 showing affordable housing completions in Surrey Heath, monitoring year 2018-19.
- (3) Introductory text Section 6 Development Management Policies; Surrey Heath Core Strategy and Development Management Policies Document 2012.
- (4) Policy DM2, and supporting text, and related Policies Map excerpt of the Development Management Policies; Surrey Heath Core Strategy and Development Management Policies Document 2012.
- (5) Pre-planning enquiry letter from Thames Water dated 28 March 2019.
- (6) Signed and dated Unilateral Undertaking.
- (7) Surrey County Council Local Committee (Surrey Heath) Report: On Street Parking Review of Surrey Heath 13 June 2019.

- (8) Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document 2019.
- (9) Thames Basin Heaths Strategic Access Management and Monitoring Project Tariff Guidance 2011.