



# Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19)

## Duty to Cooperate Statement of Compliance



July 2024

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## 1. Introduction

- 1.1. The purpose of this Statement of Compliance is to demonstrate how the Council has met the requirements of the Duty to Cooperate in the production of the Surrey Heath Local Plan 2019 – 2038 to date. It is being published alongside the Pre-Submission Surrey Heath Local Plan (2019 – 2038) ('the Pre-Submission Local Plan') which is published for comment from 7th August to 20th September 2024. It updates the Statement of Compliance published alongside the Draft Surrey Heath Local Plan: Preferred Options in March 2022.
- 1.2. Whilst joint working has been taking place with many partners for a number of years, in order to set a 'starting point' for Local Plan purposes, this has been taken as a date just after the first Duty to Cooperate Scoping Report was prepared which is February 2017. Significant matters agreed before this point are also referenced in this Statement.
- 1.3. In addition to engagement with prescribed duty to cooperate bodies, the Council also engages with many other stakeholders including residents, utility companies and local interest groups. This engagement is in line with local planning regulations and the Council's adopted Statement of Community Involvement 2020. A Consultation Statement setting out how stakeholders have been engaged and a summary of responses received has been prepared to support the Pre-Submission Local Plan.
- 1.4. In May 2018, the Council published a Duty to Cooperate Statement to support the Local Plan Regulation 18 Issues and Options/Preferred Approach consultation. Key elements of engagement up to that point are included in this Duty to Cooperate Compliance Statement but further detail can be found in the May 2018 Statement published on the Council's evidence page.
- 1.5. This Duty to Cooperate Statement should also be read in conjunction with the Statements of Common Ground prepared by the Council with a number of duty to cooperate partners. These can be viewed on the local plan evidence base webpage and are discussed in more detail in Section 3 of this Statement and elsewhere as appropriate.
- 1.6. A number of representations on strategic planning matters were received from duty to cooperate bodies in relation to the Draft Surrey Heath Local Plan consultation in 2022, although none suggested that the Council had not met the duty to cooperate.
- 1.7. This Statement will be updated via an addendum following the Pre-Submission Local Plan publication and comments received.



## 2. What is the Duty to Cooperate?

- 2.1. In preparing local plans, local authorities must address strategic planning matters that cross administrative boundaries. The duty to cooperate places a legal duty on local planning authorities, county councils in England and other prescribed bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
- 2.2. The duty to cooperate is a legal test that will be examined by a planning inspector when the plan is submitted to government for examination. Therefore, the Council needs to provide robust evidence of the duty to cooperate process. This evidence will need to provide details about those who the Council has cooperated with, the nature and timing of co-operation and how it has influenced the preparation and content of the Local Plan.
- 2.3. The duty to cooperate is not a duty to agree, but the Council must demonstrate that it has made every effort to work closely with identified partners. The duty to cooperate is ongoing and does not end with the adoption of the Local Plan.
- 2.4. Although the duty to cooperate is proposed to be abolished through the Levelling Up and Regeneration Act, it remains in place for the preparation and consideration of the Surrey Heath Local Plan 2019 - 2038.



### 3. National Legislation and Policy

- 3.1. The Duty to Cooperate is a requirement of the Localism Act 2011 (section 110). This introduces Section 33a into the Planning and Compulsory Purchase Act which requires ongoing collaboration and engagement between neighbouring local authorities, the County Council, and other relevant bodies in the preparation of any development plan and defines the strategic matters which relate to the duty as:
- a) Sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for and in connection with infrastructure that is strategic and has or would have significant impact on at least two planning areas; and
  - b) Sustainable development or use of land in a two tier area if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter.
- 3.2. The Town and Country Planning (England) (Regulations) 2012 sets out a legal test relating to the duty to cooperate and defines the prescribed bodies (in addition to surrounding planning authorities and Surrey County Council) where the Council is required to engage as part of the Duty to Cooperate. These are defined as:
- ◆ The Environment Agency
  - ◆ Historic England
  - ◆ Natural England
  - ◆ The Mayor of London
  - ◆ The Civil Aviation Authority
  - ◆ Homes England
  - ◆ Clinical Commissioning Groups
  - ◆ The Office of Rail Regulation
  - ◆ Transport for London
  - ◆ Each integrated Transport Authority
  - ◆ Each Highway Authority within the meaning of section 1 of the Highways Act 1980
  - ◆ The Marine Management Organisation (not relevant to Surrey Heath)



- 3.3. In addition, although not defined in the same way as the organisations listed above, Local Enterprise Partnerships and Local Nature Partnerships are defined in the Regulations as bodies that local authorities have a duty 'to have regard to' so long as those activities are relevant to plan making. From April 2024 Local Enterprise Partnerships are no longer funded by Government and their functions have been devolved to upper tier authorities.
- 3.4. The National Planning Policy Framework 2023 (NPPF) identifies that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.
- 3.5. The NPPF also states that strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans and that effective on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.
- 3.6. The NPPF duty to cooperate requirements identify the need for authorities to prepare one or more "Statements of Common Ground" (SCG) with further guidance set out in the Planning Practice Guidance. The purpose of SCGs is to show how cross boundary issues have been jointly addressed and how they will be progressed in the future:
  - ◆ They are a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters;
  - ◆ They document where effective co-operation is and is not happening throughout the plan-making process;
  - ◆ They are a way of demonstrating at examination that plans are deliverable over the plan period and based on effective joint working across local authority boundaries; and
  - ◆ They form part of the evidence required to demonstrate that a local authority has complied with the duty to cooperate.
- 3.7. The Council has prepared a number of Statements of Common Ground with duty to cooperate partners as set out below. These will be updated following the Reg19 publication and prior to submission if it is considered helpful to the Local Plan Inspector to do so. Additional Statements of Common Ground may also be added at that stage. Of note, Statements of Common Ground were prepared and published alongside the Regulation 18 Local Plan with Hart District and Rushmoor Borough. These are available on the Councils website.



Table 1: Agreed Statements of Common Ground

Reference	SCG Partner (s)	Key Strategic Planning Matters covered
<b>SCG 1</b>	Hart District Council	Housing, Thames Basin Heaths Special Protection Area (TBHSPA), Gypsy and Travellers and Travelling Showpeople, all other identified potential cross boundary strategic planning matters (Updates a SCG published alongside the Reg18 Local Plan)
<b>SCG 2</b>	Rushmoor Borough Council	Housing, TBHSPA, Gypsy and Travellers and Travelling Showpeople, all other identified potential cross boundary strategic planning matters (Updates a SCG published alongside the Reg18 Local Plan)
<b>SCG 3</b>	Bracknell Forest Borough Council - Drafted but following discussion with BFB will be finalised and published prior to Submission of the Local Plan.	Housing need, Economic Needs, TBHSPA, Gypsy and Traveller and Traveling Showpeople Needs, Infrastructure, Green Infrastructure.
<b>SCG 4</b>	Natural England	TBHSPA, air quality, biodiversity
<b>SCG 5</b>	Environment Agency	Flood Risk, environment, employment sites
<b>SCG 6</b>	Surrey County Council	Highways, education, flood risk, libraries, waste and minerals, strategic planning.
<b>SCG 7</b>	National Highways	Strategic highway network
<b>SCG 8</b>	Thames Water	Infrastructure, Gypsy and Traveller sites

- 3.8. In addition to the above, the Council is a signatory to other Statements of Common Ground, including, in 2018 with Hart and Rushmoor in relation to their Local Plans.







- 3.9. In 2021, the Council agreed a Statement of Common Ground with Bracknell Forest Borough prior to the submission of the Bracknell Forest Borough Local Plan covering matters including housing, employment, transport and the TBHSPA.

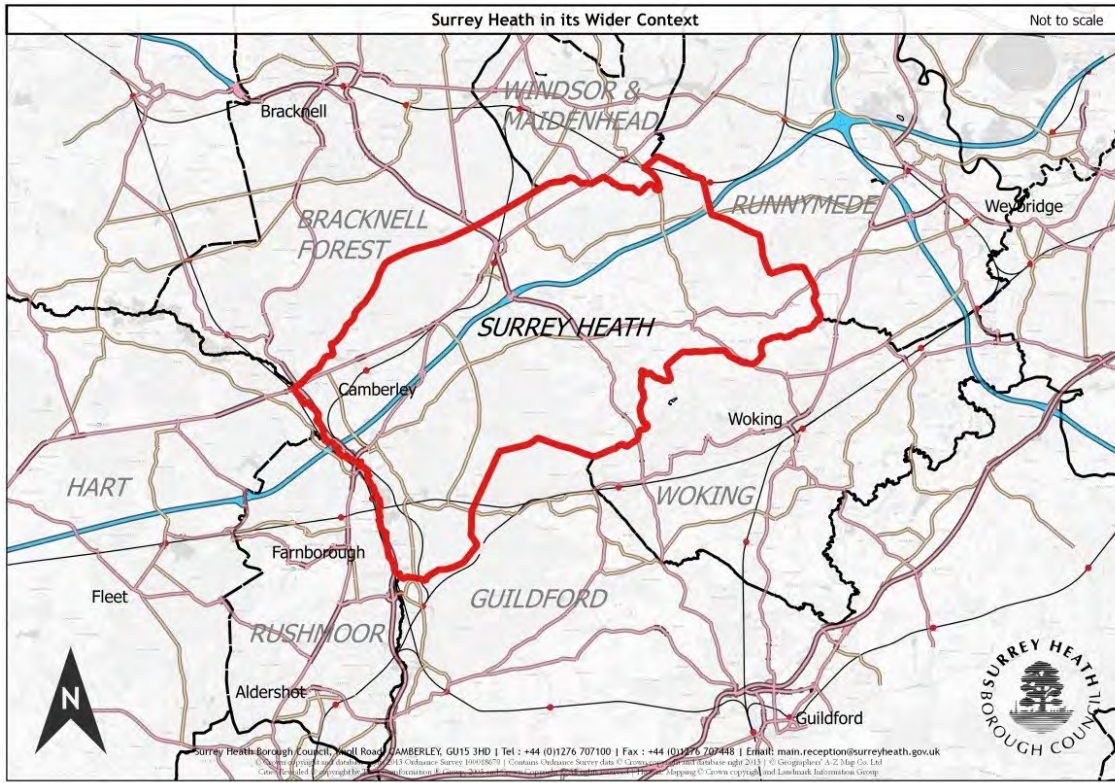


## 4. Surrey Heath Strategic Context

- 4.1. Surrey Heath lies in the North West corner of Surrey and adjoins the counties of Berkshire and Hampshire. It shares boundaries with:
- ◆ Bracknell Forest Borough;
  - ◆ The Royal Borough of Windsor and Maidenhead;
  - ◆ Runnymede Borough;
  - ◆ Woking Borough;
  - ◆ Guildford Borough;
  - ◆ Rushmoor Borough; and,
  - ◆ Hart District.
- 4.2. The Borough covers an area of some 9,607 hectares and has a population of just over 90,500. The western half of the Borough is mainly urban in character and comprises a number of settlements with Camberley being the main centre. The eastern half of the Borough is mostly countryside and Green Belt.
- 4.3. The Spatial Portrait set out in the Pre-Submission Local Plan sets out the context for the Borough. Some elements of the context within which Surrey Heath sits which are particularly relevant to the Duty to Cooperate are set out below. The Borough lies within a two-tier structure and Surrey County Council are responsible for the provision and maintenance of a range of infrastructure. Strategic cross boundary matters relevant to the County Council are set out under later sections of this document.



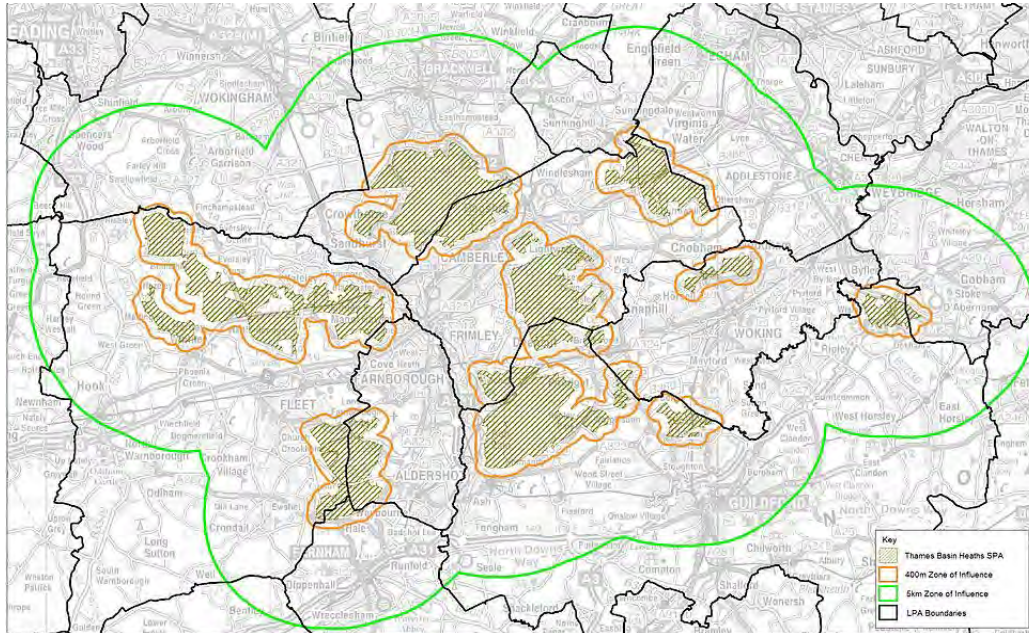
Figure 1: Relationship with surrounding local authorities.



- 4.4. The Borough contains a number of heathland areas recognised as being of international and national importance which form part of the Thames Basin Heaths Special Protection Area (TBHSPA) that extends across other authorities in Surrey as well as Berkshire and Hampshire. 23% of the Borough is covered by the TBHSPA with a further 19% within the 400m exclusion zone around the SPA where no net new residential development is permissible. Furthermore, just under half of the Borough is designated Green Belt.



**Figure 2: Thames Basin Heaths Special Protection Area**



- 4.5. Much of the Borough is therefore constrained which impacts on the opportunities for delivering new homes and supports the need to work collaboratively with other local authorities.
- 4.6. Surrey Heath lies within the Blackwater Valley with the River Blackwater forming the western boundary of the Borough. The Blackwater Valley authorities work closely together on issues including transport, green infrastructure and economic development. In work prepared jointly with Hart and Rushmoor to support the Hart and Rushmoor Local Plans (adopted 2020 and 2019 respectively), the three authorities were identified as forming a Housing Market Area and Functional Economic Area and this informed Surrey Heath’s representations on both of those local plans.
- 4.7. The Borough is located within the former Enterprise M3 Local Enterprise Partnership (LEP) area and within the Surrey Local Nature Partnership (SNYP). Camberley is identified by the LEP as a ‘step – up’ town with latent potential economic growth. Whilst the Government has not continued to fund LEPs from April 2024 it is likely that a range of partnership working on economic matters will continue across the geographic area and particularly across Surrey as upper tier authorities pick up previous LEP functions.



**Figure 3: Surrey Heath and the Enterprise M3 LEP**



- 4.8. The Borough contains a stretch of the M3 as well as other major transport routes (road and rail) which clearly extend beyond Surrey Heath boundaries. The impact of development in Surrey Heath and cumulatively with development elsewhere on transport routes is a matter which may require collaborative joint working.
- 4.9. The Borough also contains Frimley Park Hospital whose catchment extends beyond the Borough boundaries and falls within two Integrated Care Boards (NHS Frimley and NHS Surrey Heartlands). In May 2023 the replacement of Frimley Park Hospital was named as a priority scheme in the New Hospitals Programme. This may have potential long term cross boundary issues but at present there is no information regarding any potential new site or plans for the re-use of the current site.



- 4.10. Also relevant to the duty to cooperate discussions is the stage at which other local authorities have reached with their local plans. For those authorities bordering Surrey Heath, this is set out in Appendix I.



## 5. Strategic Planning Matters and Duty to Cooperate Partners

- 5.1. Having regard to advice in the NPPF and relevant legislation, a Duty to Cooperate Scoping Statement was consulted on with the duty to cooperate bodies in 2017. This sought to agree the strategic cross boundary planning matters affecting Surrey Heath Borough and the relevant duty to cooperate partners. The Scoping Statement was amended following consultation and a final version was published alongside the first Regulation 18 consultation on the Local Plan in 2018.
- 5.2. In preparing the Preferred Options version of the Local Plan, and in view of changes to national planning policy and guidance, the opportunity was taken to revisit the strategic matters previously identified. The Council consulted on a revised Duty to Cooperate Scoping Framework in July – September 2020 and, following amendment as a result of consultation responses, this was published in October 2020.
- 5.3. Based on the revised Framework, the Council identified the following strategic cross boundary matters that have the potential to affect the Local Plan:

### **Housing and Economic Needs**

Matter 1: Meeting Housing Needs

Matter 2: Meeting needs for Gypsies and Travellers and Travelling Showpeople

Matter 3: Delivering Economic growth including retail

### **Natural Environment**

Matter 4: Thames Basin Heaths Special Protection Area

Matter 5: Natural Environment and Green Belt

Matter 6: Flooding

### **Infrastructure**

Matter 7: Transport

Matter 8: Social infrastructure including Healthcare and Education

Matter 9: Utilities including water and waste water

### **Climate Change**

Matter 10: Climate Change



- 5.4. No comments were received from the duty to cooperate bodies in relation to the Draft Local Plan Preferred Options consultation, 2022 suggesting that these were not the appropriate strategic planning matters. Appendix 2 sets out a matrix of Duty to Cooperate Strategic Matters and partners.





## 6. Duty to Cooperate Engagement Mechanisms

- 6.1. The Council is actively involved in a number of cross boundary and joint partnerships that have the potential to directly or indirectly inform the Local Plan. Table 2 below sets out details of regular partnership meetings that have relevance to the preparation of the Local Plan.

**Table 2: Table of existing Partnership Meetings (relevant to Plan making)**

<b>Partnership/Working Group</b>	<b>Authorities/Organisations involved</b>	<b>Purpose</b>
Surrey Planning Officers Association	All Surrey Heads of Planning.	To agree joint working opportunities and arrangements, consider matters of cross boundary significance and to discuss all other issues of Surrey interest.
Planning Working Group	All Surrey Planning Policy Managers.	To discuss and resolve cross boundary policy issues, share relevant information and experience.
Surrey Heath Partnership	Including Surrey Police and Fire and Rescue, Surrey County Council, ICBs as well as the business community and voluntary sectors.	Sets out a shared 25 year Strategy for the Borough with a shorter term Action Plan.
Thames Basin Heaths Joint Partnership Board	Councillor representatives from all affected local authorities and County Councils as well as Natural England. Surrey Heath performs the secretarial role in the Partnership.	The Board is set up to ensure a consistent strategic approach to mitigate and manage the impacts of development on the SPA.



<b>Partnership/Working Group</b>	<b>Authorities/Organisations involved</b>	<b>Purpose</b>
Thames Basin Heaths Joint Officers Group	Officer representatives from all affected local authorities and County Councils as well as Natural England.	The Group co-ordinates the strategic policy approaches of mitigating and managing the impacts of development on the SPA. It provides information to the JSPB for strategic decision making.
Surrey Infrastructure Steering Group (replaces the former Surrey Future Steering Board)	Surrey County Council, Surrey authorities, Surrey Nature Partnership.	Brings partners together to agree the investment priorities to support the County's economy and oversee the Surrey Place Ambition.
Surrey Leaders Group	Surrey County Council and all Surrey local authority leaders.	Cross boundary issues.
Surrey Planning and Health Forum	Includes representatives from Surrey County Council, ICBs, Surrey local authorities.	Established in 2019 to strengthen links across planning and health teams. Networking Group that reports to the Health and Wellbeing Board.
Surrey Development Forum	Includes representatives from Surrey County Council, the Surrey Districts and Boroughs, statutory and local agencies and the development industry.	Started in October 2020 and linked to the Surrey Place ambition. To identify and address strategic issues, share best practice and to facilitate collaborative, creative thinking to achieve sustainable growth in Surrey for the



Partnership/Working Group	Authorities/Organisations involved	Purpose
		benefit of the current and future communities.
Climate Change Officers Meeting	Surrey County Council, all Surrey local authorities.	To allow for co-operation on climate change matters in Surrey including the delivery of County-wide projects.

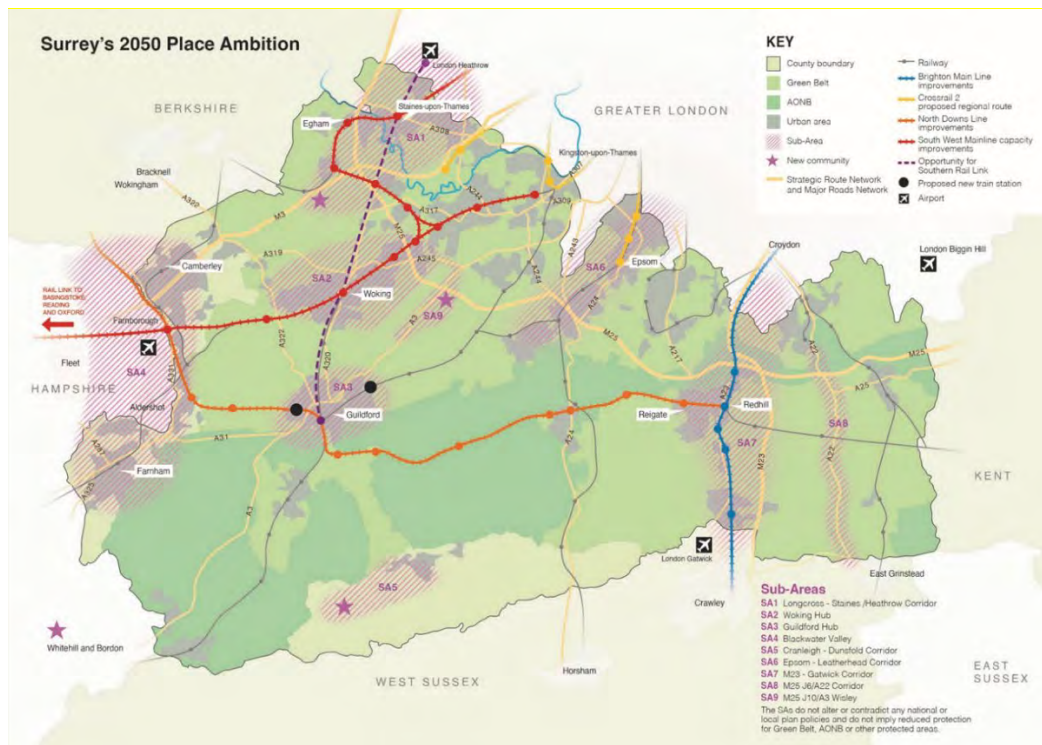
### Surrey wide initiatives

- 6.2. Surrey Future was established in 2013 to bring together Surrey’s local authorities and business leaders to agree the investment priorities to support Surrey’s economy. A Surrey Future Steering Board was established to take forward work on strategic planning and infrastructure.
- 6.3. In 2017 the Borough Council signed a memorandum of understanding relating to an Interim Local Strategic Statement for Surrey 2016 – 2031 (December 2017) whereby all Surrey authorities and the County Council committed to joint working towards a number of strategic objectives:
- 1) Supporting economic prosperity
  - 2) Meeting housing needs
  - 3) Delivering Infrastructure
  - 4) Supporting environmental sustainability, natural resource management and conserving and enhancing the character and quality of the countryside and openness of the Green Belt.
- 6.4. A Surrey Infrastructure Prioritisation Framework was agreed by Surrey County Council’s Cabinet in February 2021. Regular officer meetings between SHBC and SCC began in January 2022 to discuss infrastructure matters and these meetings are now held approximately quarterly.



- 6.5. Following consultation, Surrey County Council, the Surrey local authorities and partners have prepared a Surrey 2050 Place Ambition, 2023 to ensure that Surrey continues to play a full part in the economic success of the country over the next 30 years, as a key driver of growth, innovation and skills in the national economy, and an excellent place where people can live, work and learn. This work was originally led by the Surrey Futures Steering Group, but is now being taken forward through the Surrey Infrastructure Steering Group which has a core membership of Surrey Borough and district authorities and the County Council.
- 6.6. Within the Place Ambition, Camberley (together with Frimley) is identified as one of 27 Surrey towns of strategic significance and one of nine primary centres that serve the wider regional economy and are a focus for significant development. Surrey Heath lies within Sub Area 4 – Blackwater Valley Corridor as shown on the following Figure.

**Figure 4: Surrey Place Ambition sub areas**



**Other engagement mechanisms**

- 6.7. In addition to representation on the above groups, the process of on-going co-operation with duty to cooperate bodies has been via the following:
- ◆ Preparation of a Duty to Cooperate Scoping Framework with input by the duty to cooperate bodies;



- ◆ Consultation on emerging drafts of the Surrey Heath Local Plan (2018, 2022);
- ◆ One to one meetings (including virtual meetings);
- ◆ Email correspondence including topic specific letters, and telephone calls;
- ◆ Joint evidence/consultation on evidence;
- ◆ Briefing sessions;
- ◆ Feedback on other local authority Local Plans and Policy documents;
- ◆ Input into strategic strategies such as the EM3 Industrial Strategy and Surrey Place Ambition.

6.8. The Council has recorded the process of engagement and co-operation. Whilst detailed Minutes are not included as part of this Statement, a summary of agreed Meeting outcomes is included in the following Sections. The Council's Authority Monitoring Report also includes a summary of Duty to Cooperate activities undertaken each year.

#### **Draft Local Plan - Regulation 18 Consultations, 2018 and 2022**

- 6.9. The Council undertook public consultation on a Surrey Heath Issues and Options/Preferred Approach Local Plan in 2018. Further information on this consultation can be found in Appendix 3 to the Consultation Statement published alongside the Local Plan.
- 6.10. Further consultation was undertaken on a Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) between March and May 2022. An additional consultation that focused solely on the allocation of sites for gypsies and travellers and travelling showpeople took place in August – September 2022. Key matters raised are highlighted in the following topic sections of this Statement and a summary of the representations and the Council's response to those can be found in Appendices 4 and 5 to the Consultation Statement published alongside the Local Plan.

#### **Undertaking Joint Studies**

- 6.11. A number of studies which have informed the Local Plan have been jointly commissioned or undertaken, either in partnership with duty to cooperate bodies, or in consultation with them as set out in Table 3. Engagement on some of these is set out in more detail in later sections of this Statement.



**Table 3: Duty to Cooperate partners involvement in the Evidence Base**

<b>Study</b>	<b>Partners/Involvement</b>	<b>Local Plan Outcome</b>
Sustainability Appraisal	Statutory consultees consulted on: The Scoping Report; The SA/SEA Interim Report 2018; and The SA/SEA Interim Report 2022	Input into the SEA/SA process.
Strategic Land Availability Assessment	Call for Sites sent to: Hart District Council, Rushmoor Borough Council, Guildford Borough Council, Royal Borough of Windsor and Maidenhead, Runnymede Borough Council, Surrey County Council, Woking Borough Council, Waverley Borough Council, Bracknell Forest Borough Council, Natural England, Historic England, Environment Agency, Enterprise M3 LEP  Draft SLAA shared for comment with:  Hart District Council Rushmoor Borough Council	Identification of potential sites for assessment.           Agreement to the process by which the Council has identified potential housing capacity and amendments to the SLAA following comments from Hart District Council.
Employment Land Technical paper update, 2019 (updated in 2023)	2019 version shared with:	Ensure that Surrey Heath is making an appropriate contribution to economic growth within the Functional



Study	Partners/Involvement	Local Plan Outcome
	Hart District Council, Rushmoor Borough Council, Enterprise M3 LEP	Economic Area and the EM3 LEP.  Inform Local Plan economic development policies.
Housing Needs Assessment 2020 and 2023	Sections of the 2023 HNA shared with Surrey County Council	Input into the assumptions and conclusions relating to the needs for specialist housing and children's accommodation.
Strategic Flood Risk Assessment	Consultation/technical input:  Surrey County Council, Environment Agency	Inform site allocations to ensure that development is located in areas at lowest risk of flooding and is consistent with national policy.  Inform Local Plan flood risk policies.
Hart, Rushmoor and Surrey Heath Water Cycle Study	Joint Commission/input:  Hart District Council, Rushmoor Borough Council, Environment Agency, Natural England, Hampshire County Council, Surrey County Council.	Inform Local Plan policies, e.g. Policy DH4 Sustainable Water Use and the Infrastructure Delivery Plan.
Habitat Regulations Assessment	Discussion on SANG matters with Natural England.  Natural England provided feedback on Air Quality Modelling, produced by Aecom.	Inform Local Plan policies on Biodiversity and Thames Basin Heaths SPA  Evidence and agree the mechanism to avoid and mitigate the impact of new development on the TBHSPA.



Study	Partners/Involvement	Local Plan Outcome
Infrastructure Delivery Plan (IDP)	Request for information sent to Surrey County Council, Highways Agency, ICBs (formerly CCGs), EM3 LEP, Utilities, Frimley Health NHS Trust in 2021 and a draft IDP sent for comments in May 2024. Specific meetings/correspondence with some providers over 2022 - 2024.	To identify and deliver the required infrastructure to support the growth identified in the emerging Local Plan.
Strategic Highways Assessment (SHAR)	National Highways, Surrey County Council. Information briefing session held with adjoining local authorities.	Inform the spatial strategy, site allocations, transport policy and the infrastructure delivery plan.





## 7. Strategic Matters

- 7.1. The following sections set out the specific cross boundary issues under each strategic planning matter and how the Council has worked collaboratively with duty to cooperate bodies in order to address these in the preparation of the Surrey Heath Local Plan.

### Matter 1 – Meeting Housing Needs

#### What is the Strategic cross boundary matter?

- 7.2. The key strategic housing issues relevant to the Surrey Heath Local Plan are:
- ◆ The identification of the number and type of new homes needed;
  - ◆ Assessment of the capacity in Surrey Heath to meet local housing need and whether there is a need to approach other authorities to help meet any unmet needs;
  - ◆ An understanding of housing needs and capacity in neighbouring local authorities;
  - ◆ The availability of sufficient TBHSPA mitigation measures (namely the provision of Suitable Alternative Natural Greenspace (SANG)) to enable delivery of the required number of new homes (see Matter 4).
- 7.3. As set out in the Context section, Surrey Heath is significantly affected by environmental and Policy constraints that affect the opportunities for future housing development. This includes the need for the provision of measures to mitigate the impacts of development upon the Thames Basin Heaths Special Protection Area as set out in Matter 4. Capacity work undertaken by the Council through the Plan making process has consistently demonstrated a likely shortfall in housing provision and as such this has been made clear to other relevant neighbouring local authorities at points throughout the plan making process. The key strategic matter is therefore the delivery of sufficient housing to meet the Government's standard methodology requirement for Surrey Heath (321 homes per annum).



### **Who has been involved and arrangements for co-operation**

- 7.4. All neighbouring and Surrey local authorities have been engaged in this matter. There is a long standing relationship of close working with Hart and Rushmoor on housing matters as set out below. Having regard to the historic housing market relationships with Hart and Rushmoor and the inclusion of unmet needs in Surrey Heath in the adopted Hart Local Plan (see below) more detailed discussions have been held with Hart District, however, in line with the NPPF, all neighbouring and Surrey authorities have been engaged. Co-operation has been mainly through emails and virtual meetings.

### **How the issue has been addressed**

- 7.5. At the time of preparing the Hart and Rushmoor Local Plans, the three authorities undertook work which identified them as comprising a Housing Market Area. A Strategic Housing Market Assessment (SHMA) was prepared jointly in 2009 with a second published in December 2014. A further update was prepared in 2016 to inform plan making in the three authorities. A Joint Member Liaison Group was also established to discuss matters of housing need across the HMA as well as related matters regarding the Thames Basin Heaths Special Protection Area and employment needs to support work on the Rushmoor and Hart Local Plans. As a result, there has been a long history of collaborative working between the three authorities.

- 7.6. A Joint Statement of Common Ground agreed in November 2018 to support the Hart Local Plan Examination noted (para 39):

It is recognised by the three authorities that Surrey Heath has a restricted housing land supply with a relatively high proportion of area subject to national planning constraints and policies such as Green Belt and SSSIs. Other land availability issues and environmental constraints such as the Thames Basin Heaths Special Protection Area further impact onto available supply.

- 7.7. The adopted Hart and Rushmoor local plans were examined against the 2012 National Planning Policy Framework. For those plans, the objectively assessed housing needs identified in the 2014 SHMA was the start point for establishing a housing requirement.



- 7.8. The Surrey Heath Local Plan has been prepared under more recent NPPFs and so the housing requirement is informed by a local housing needs assessment using the standard method. The Council has engaged all neighbouring authorities in discussions on unmet needs. The standard methodology gives a local housing need of 321 dwellings per annum (as set out in the SLAA 2024). At all stages of the Plan making process to date Surrey Heath has made clear to partners that there is likely to be a potential shortfall in being able to meet local housing needs due to the environmental constraints within the Borough. This has included through formal responses to Hart and Rushmoor Local Plans and appearance at the Hart Local Plan examination and more recently through written correspondence to neighbouring and Surrey Authorities. Both Hart and Rushmoor have met their own local housing needs.
- 7.9. The Surrey Heath Issues and Options Local Plan consultation in 2018 identified a shortfall in housing capacity. In view of advice regarding Housing Market Areas in the NPPF at that time, and the identification of Hart, Rushmoor and Surrey Heath as an HMA and work undertaken through the joint SHMA, the Council made representations about the likely shortfall in response to consultation on the Pre-Submission Hart Local Plan. Following discussion on this matter at the Hart Local Plan Examination, the Hart Local Plan Inspector stated in paragraph 35 of his Report:

*“...I CONSIDER THAT THIS PLAN SHOULD SEEK TO MEET THE IDENTIFIED UNMET NEEDS OF SHBC OF 731 DWELLINGS, WHICH REPRESENTS THE MOST UP-TO-DATE FIGURE AT THIS POINT IN TIME.”*

- 7.10. The Hart Local Plan 2014 – 2032 Strategy and Sites was adopted in April 2020. Paragraph 90b of the adopted Hart Local Plan states [in part]:

*90 ... THIS REQUIREMENT COMPRISES:*

*B - AN ADDITIONAL 41 HOMES PER ANNUM (731 HOMES) TO ADDRESS AN UNMET HOUSING NEED IN SURREY HEATH UNDER THE DUTY TO CO-OPERATE.’*

- 7.11. In 2020 work on the emerging Surrey Heath Strategic Land Availability Assessment (SLAA) still suggested that there was likely to be a shortfall in capacity for new homes against the Governments standard methodology. Further detail is set out in the Council’s Housing Supply Topic Paper published alongside the Local Plan.



- 7.12. In December 2020 letters were sent to all Surrey and neighbouring authorities setting out the current constraints in the Borough and the emerging SLAA evidence that there was likely to be a shortfall in housing capacity against housing needs (see Appendix 3). The letter set out that further contact would be made once further progress on the SLAA had been made.
- 7.13. A further letter was sent to Surrey and neighbouring authorities in October 2021 (excluding Hart and Rushmoor) confirming a shortfall in capacity against housing needs (see Appendix 4). The letters also highlighted the significant need for gypsy and traveller pitches and the challenges in identifying sufficient supply. Authorities were asked whether they were able to meet any unmet general housing needs or the needs of gypsies and travellers and travelling showpeople. The outcome of this request is set out in Appendix 5. No authorities responded suggesting that they could take any unmet housing needs from Surrey Heath and a number reiterated this in their responses to the Local Plan consultation in 2022.
- 7.14. Duty to Cooperate meetings were held with Hart (June 2021) and Rushmoor (July 2021) to discuss relevant cross boundary strategic matters including unmet housing needs. In demonstrating the steps that the Council had taken to identify capacity, the draft Strategic Land Availability Assessment and Countryside Capacity Study were shared with the two authorities. Following this, and completion of the draft SLAA, a written request was made in October 2021 to both Hart and Rushmoor regarding unmet housing needs and gypsy and traveller and travelling showpeople needs (see Appendix 6). A further meeting was held with Hart in January 2022.
- 7.15. The responses from the Hart and Rushmoor letters in October 2021 are summarised in Table 4 below and the agreed outcomes of the Duty to Cooperate meetings in Table 5. In their letter of December 2021, Hart District Council confirmed their commitment to deliver 41 new homes per annum over the overlapping Plan periods (2019 – 2032) to meet unmet needs in Surrey Heath and this therefore informed the Surrey Heath Draft Local Plan (Regulation 18), 2022. This commitment was also set out in an agreed Statement of Common Ground between the two authorities (SCGI) published on the Council’s website alongside the Draft Local Plan in March 2022. A Statement of Common Ground was also agreed at that time with Rushmoor Borough Council.
- 7.16. Hart District Council further confirmed this commitment in their response to the Draft Surrey Heath Local Plan: Preferred Options consultation, 2022 (letter dated 18<sup>th</sup> May 2022 from the Hart Portfolio Holder for Place). This states:



“HDC confirms that its adopted local plan requirement of 423 homes per annum between 2014 and 2032 includes 41 homes per annum to contribute to unmet housing need in Surrey Heath. This amounts to 533 homes from 2019 to 2032 – the period where the Hart plan and the Surrey Heath plan overlap.”

- 7.17. In September 2023, and following an update to the SLAA, a further meeting was held with Hart officers and then in July 2024 with the Portfolio holders for each authority. These meetings discussed an updated Statement of Common Ground which following further email correspondence was agreed later that month and which is published alongside the Pre-Submission Local Plan.
- 7.18. The SCG with Rushmoor has also been updated and is published alongside the Pre-Submission Local Plan.

**Table 4: Summary of Responses from Hart District Council and Rushmoor Borough Council informing the Reg18 Draft Local Plan, 2022**

<p><b>Hart District Response</b>  <b>Response - 21 December 2021</b></p> <p>Confirmed the Local Plan commitment of 41dpa to meet unmet needs in Surrey Heath. Having regard to the recent adoption of the Hart Local Plan and no need for an imminent review, to the likely change to the Governments approach to housing numbers and to the fact that the Surrey Heath shortfall falls late in the Plan period, Hart is not able to increase the provision of unmet needs that can be provided for.</p> <p><u>Gypsy and Traveller Needs</u></p> <p>Hart is finding it challenging to meet its own needs and is unable to make provision for any unmet need in Surrey Heath.</p> <p><u>SANGs</u></p> <p>Hart is currently reviewing SANG capacity figures to understand its own long term SANG capacity needs.</p> <p><u>Other Matters</u></p> <p>Hart made a number of comments on the SLAA and on the need for a buffer. Comments on the SLAA related to using the SLAA to focus on the needs and supply in Surrey Heath and to deal separately with the matter of unmet needs being provided for within Hart District. It was also suggested that the 5 Year Housing Land Supply was separated from the SLAA.</p>
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[Note – following a further meeting with Hart in January 2022 a number of changes were made to the Surrey Heath SLAA to take account of these comments]

**Rushmoor Borough Response - 2 December 2021**

Noted factual points raised in the letter and set out in the SLAA regarding the currently identified shortfall and the SLAA capacity sources.

Noted that no account had been taken at that point for unmet needs to be met from the commitment in the Hart Local Plan.

Noted that the Rushmoor Local plan meets the objectively assessed needs for the Borough.

Advised that the significant buffer anticipated at the time of the Rushmoor Local Plan adoption has been reduced due to factors such as delays in sites coming forwards. As at April 2021 a small surplus over the Local Plan requirement is identified.

The Council is unable to meet any unmet needs arising from Surrey Heath.

Gypsies and Travellers

The Council is unable to meet any unmet needs for Gypsy and Traveller accommodation.

SANG

Suggest would be beneficial for the authorities to meet to discuss SANG with the potential to widen to other members of the TBHSPA Joint Partnership Board.

**Table 5: Agreed Outcomes of meetings with Hart and Rushmoor**

Date	Present	Outcomes
June 2021	Hart	<ul style="list-style-type: none"> <li>- Clarification on Local Plan progress in both authorities.</li> <li>- Recognition of the constraints to development in Surrey Heath.</li> <li>- Surrey Heath officers explained that they have a current shortfall in meeting housing needs having explored reasonable options outside the Green Belt.</li> </ul>



		<ul style="list-style-type: none"> <li>- Agreement that the adopted Hart Local Plan includes 41dpa of unmet need to be met from HDC up to 2032 and HDC advised that this Plan will need to be reviewed within five years of adoption. HDC were of the opinion that it cannot be assumed that the next local plan (which might run from say 2025 to 2040) will include the 41dpa figure to 2032 as it will need to be based on the latest evidence and latest versions of national policy and guidance which, in light of the Planning White Paper, may not include the duty to cooperate. Further discussion on this will be needed.</li> <li>- Agreement that SHBC would share the housing capacity evidence base with HDC (Countryside Capacity Study and SLAA).</li> <li>- Agreement to arrange further SANG capacity discussions.</li> <li>- Recognition of the significant need identified for Gypsies and Travellers and Travelling Showpeople arising in the SHBC evidence and the challenges for each authority in meeting Gypsy and Traveller needs.</li> <li>- Broad discussion on other Strategic Matters including identifying where further discussion may be needed.</li> </ul>
July 2021	Rushmoor	<ul style="list-style-type: none"> <li>- Clarification on SHBC Local Plan progress and RBC adopted Local Plan position.</li> <li>- Surrey Heath officers explained that they have a current shortfall in meeting housing needs having explored reasonable options outside the Green Belt, and that they are considering Duty to Cooperate options for addressing the unmet need. Joint recognition of the constraints in Surrey Heath.</li> </ul>



		<ul style="list-style-type: none"> <li>- RBC officers explained that the housing need in Rushmoor is currently being met but that it is not envisioned that there will be any additional supply.</li> <li>- Surrey Heath officers also outlined the backlog of need for Gypsy and Traveller pitches and challenges in finding new sites.</li> <li>- Challenges relating to SANG capacity in both boroughs were identified.</li> <li>- Agreement to arrange further joint discussions between SHBC, RBC and Hart District Council (HDC) on housing, employment and SANG capacity.</li> <li>- Broad discussion on other Strategic Matters including transport, climate change and identifying where further discussion may be needed.</li> </ul>
January 2022	Hart	<ul style="list-style-type: none"> <li>- Confirmation that HDC would provide 41dpa towards unmet needs in Surrey Heath over the overlapping Local Plan periods (2019 – 2032) as set out in the adopted Hart Local Plan and in the letter from HDC dated 21 December 2021;</li> <li>- Clarification from SHBC that a buffer is needed to demonstrate a flexible supply rather than increasing the housing need figure.</li> <li>- Agreement to changes in the structure of the SHBC SLAA;</li> <li>- Agreement as to how the 41dpa of unmet need is considered in the 5YHLS;</li> <li>- Agreement to start discussions on the future approach to SANG, starting with a joint meeting with Rushmoor Borough;</li> <li>- Agreement to on-going meetings to share information on strategic and non-strategic planning matters.</li> </ul>





July 2022	Hart and Rushmoor	<p>Main purpose of meeting was to discuss SANG but the outcomes included here for completeness:</p> <ul style="list-style-type: none"> <li>- A better understanding of the challenges and opportunities regarding SANG capacity across the three authorities.</li> <li>- Confirmation that HDC is willing to help both authorities with capacity subject to HDC SANG needs and capacity in relevant SANGs.</li> <li>- Agreement to provide information to HDC so that needs and opportunities for SANG capacity can be reviewed.</li> <li>- Agreement to a joint meeting with Natural England.</li> <li>- Agreement to a joint meeting on Biodiversity Net Gain.</li> <li>- Confirmation of a review of the existing MoU between HDC and RBC following the review of SANG needs.</li> </ul>
September 2022	Hart	<ul style="list-style-type: none"> <li>- Update on the opportunity for SHBC to share SANG capacity from within Hart District and the opportunity for HDC to understand the issues facing SHBC in identifying SANG capacity in the west of the Borough.</li> <li>- Discussion as to the key matters in representations made by HDC to the SHB Local Plan Reg18 consultation.</li> <li>- Understanding of matters relating to Gypsies and Travellers and Travelling Showpeople in both authorities including unmet need in Hart and the challenges in identifying suitable sites in Surrey Heath.</li> <li>- Providing Hart DC with further information on the Local Plan timetable and ongoing evidence base.</li> </ul>
September 2023	Hart	<ul style="list-style-type: none"> <li>- Update on Local Plan progress and feedback from HDC on a draft Statement of Common Ground;</li> </ul>



		<ul style="list-style-type: none"> <li>- Refresh of matters relating to Gypsies and Travellers and Travelling Showpeople in both authorities including unmet need in Hart and the challenges in identifying suitable sites in Surrey Heath;</li> <li>- Update on progress on shared SANG;</li> <li>- Providing Hart DC with further information on the Local Plan timetable and ongoing evidence base.</li> </ul>
December 2023	Hart and Rushmoor	<ul style="list-style-type: none"> <li>- Update on Local Plan progress including confirmation by Rushmoor that Cabinet has agreed that a new Local Plan is required.</li> <li>- Update on housing need and supply and position on the HMA</li> <li>- Update on Gypsy and Traveller and Travelling Showpeople needs.</li> <li>- Update on employment Needs and agreement that logistics and strategic hubs are a sub-regional issue.</li> <li>- Update on SANG capacity and potential future discussion to follow up on the previous joint SANG project. Update from Hart on shared SANG with Surrey Heath and Rushmoor.</li> <li>- Update on how each authority was progressing the BNG requirements.</li> </ul>
July 2024	Hart	<ul style="list-style-type: none"> <li>- Meeting with Portfolio holders confirming agreed approach as set out in the Statement of Common Ground.</li> </ul>



- 7.19. In terms of meeting wider housing needs, the Council has continued to cooperate with other authorities, to raise awareness of the constrained nature of the Borough, and the inability to meet unmet needs arising from elsewhere. The evidence in the SLAA confirms that the Council is not in a position to assist other authorities in meeting any shortfall in housing capacity.
- 7.20. In addition, SCC as landowner has identified potential sites for allocation and as part landowner for Land East of Knoll Road in Camberley, joint discussions between both Councils are ongoing. A SCG has also been agreed and published with SCC.

### Outcomes to date

- ◆ Opportunity for Rushmoor and Hart to comment on the SLAA and for comments to be incorporated into the Surrey Heath SLAAs 2021 and 2022;
- ◆ Recognition by Hart and Rushmoor that Surrey Heath has a restricted land supply (HMA Statement of Common Ground, November 2018);
- ◆ Confirmation that Hart will deliver 731 homes towards unmet need in Surrey Heath (533 over the Surrey Heath Plan period) [adopted Hart Local Plan, HDC letter dated 21 Dec 2021, HDC response to the Draft Surrey Heath Local Plan and agreed SCGs] and that the housing requirement in the Surrey Heath Local Plan should be adjusted accordingly;
- ◆ Clarification as to whether any other relevant local authority is able to meet unmet housing needs in Surrey Heath – none has identified that they are able to do so;
- ◆ Continued engagement on opportunities for shared SANG to enable housing development in Surrey Heath (see Matter 4);
- ◆ Joint working with SCC on SCC owned sites;
- ◆ Awareness by other local authorities that Surrey Heath would not be able to help meet any unmet needs elsewhere;
- ◆ Ability to meet the housing requirement for Surrey Heath as set out in the Pre-Submission Local Plan (Policy SS1) and Housing Supply Topic Paper.



## Matter 2 – Meeting needs for Gypsies and Travellers and Travelling Showpeople

### What is the Strategic Cross boundary matter?

- ◆ The identification of the number and type of pitches and plots needed for Gypsies and Travellers and Travelling Showpeople within Surrey Heath Borough;
- ◆ The identification of sites to enable delivery of the pitches and plots to meet this need;
- ◆ The identification of whether there is a need to approach other authorities to help meet any unmet needs and whether other authorities could take on any unmet needs from Surrey Heath.

7.21. The Council has a responsibility through the National Planning Policy Framework and other legal requirements to assess and plan for the housing needs of all residents, including the Gypsy and Traveller community. The evidence base for the Surrey Heath Local Plan is the Gypsy and Traveller Accommodation Assessment, 2020 and associated supporting letter from ORS 2024. Together, these identify a need for at least 35 pitches for Gypsies and Travellers and 14 plots for Travelling Showpeople that meet the planning definition as set out in the national Planning Policy for Traveller Sites (2015, updated 2023). The GTAA also identified a need for a further pitch for Gypsies and Travellers whose travelling history is unknown and 29 pitches for Gypsy and Traveller households that did not meet the planning definition. Following the granting of planning permission for two pitches on a site to the South of the M3 junction in Lightwater and two pitches at Four Oaks, Highams Lane, the outstanding need is for 31 pitches for Gypsies and Travellers meeting the planning definition. Having regard to the constraints in the Borough set out previously, finding suitable and available sites to meet Gypsy and Traveller and Travelling Showpeople needs is challenging.

### Who has been involved and arrangements for Co-operation

7.22. All neighbouring authorities were engaged as part of the Gypsy and Traveller Accommodation Assessment 2020. To help support the Duty-to-Cooperate and provide background information for the study, telephone interviews were conducted with Planning Officers in the seven neighbouring planning authorities.



- 7.23. Additional Partners are set out in the Matrix in Appendix 2. Outside of the GTAA 2020, further co-operation has been with neighbouring and Surrey authorities and has been mainly through emails and virtual meetings, consultation on the emerging Local Plan, through a Gypsy and Traveller duty to cooperate briefing, and through formal written communication as outlined below.

#### **How the Matter has been addressed**

- 7.24. A letter was sent to all Surrey and neighbouring authorities in October 2021 (excluding Hart and Rushmoor) (see Appendix 4) which highlighted the significant need for gypsy and traveller pitches and the challenges in identifying sufficient supply from urban and countryside sites. Authorities were asked whether they were able to meet any unmet general housing needs or the needs of gypsies and travellers and travelling showpeople. The outcome of this request is set out in Appendix 5. No authorities responded suggesting that they could take any unmet needs from Surrey Heath, with other authorities also identifying challenges in identifying sites to meet their own needs and facing significant environmental and policy constraints.
- 7.25. Letters were sent under separate cover to Hart District and Rushmoor Borough Councils [October 2021] (Appendix 6) to ask whether any of Surrey Heath's unmet housing or gypsy and traveller needs could be met within these authority areas. In response, and in subsequent correspondence/discussion, neither authority has identified additional capacity to assist with meeting Surrey Heath's unmet gypsy and traveller needs.
- 7.26. Surrey Heath Borough Council were contacted by Bracknell Forest Council in February 2021 regarding whether any of their unmet gypsy and traveller needs could be met within Surrey Heath. SHBC response confirmed that there is no capacity to meet unmet needs from elsewhere within Surrey Heath.
- 7.27. A number of duty to cooperate bodies responded to the Gypsy and Traveller and Travelling Showpeople policies in the Draft Local Plan, 2022 as set out in Table 6. In the Draft Local Plan consultation in Spring 2022 it was made clear that a further consultation solely on Gypsy and Traveller and Travelling Showpeople site allocations would take place in the summer. This consultation took place in July – September 2022. A number of local authorities expressed concern that the Council may not meet its identified needs.



- 7.28. Alongside the further site allocations consultation, the Council wrote (August 2022) to all neighbouring and Surrey authorities (Appendix 7) setting out the challenges that the Borough has in meeting needs. This again sought confirmation as to whether any other authority could help to meet unmet gypsy and traveller and travelling showpeople needs. No authority that responded identified that it could meet any unmet needs. The responses are set out in Appendix 8.
- 7.29. The challenges of meeting unmet Gypsy and Traveller and Travelling Showpeople needs has also been discussed at virtual meetings with neighbouring authorities where these have been held throughout the plan-making process.
- 7.30. Following the Reg18 consultation in 2022 further work was undertaken on the potential Gypsy and Traveller sites. This showed that with the exception of Swift Lane, all other sites previously proposed for allocation had significant constraints and could not be taken forwards.
- 7.31. In the light of comments made by duty to cooperate partners at Regulation 18, the Council held a briefing session with neighbouring and Surrey authorities in September 2023. This enabled the Council to explain the work undertaken to identify Gypsy and Traveller and Travelling Showpeople sites and to discuss any concerns by neighbouring authorities. The following list of authorities were invited with those who attended in bold:
- Surrey County Council; Guildford Borough Council; Runnymede Borough Council; Woking Borough Council; Bracknell Forest; Royal Borough of Windsor and Maidenhead;** Hampshire County Council; **Hart District Council; Rushmoor Borough Council; Epsom and Ewell;** Elmbridge Borough Council; Mole Valley District Council; **Reigate Borough Council;** Spelthorne Borough Council; Tandridge District Council, **Waverley Borough Council.**
- 7.32. The briefing was followed up by a letter to all invited authorities (Appendix 9) with the responses to these set out in Appendix 10. As with previous correspondence, no local authority identified that it would be able to meet any unmet Gypsy and Traveller needs from Surrey Heath. This matter was also discussed at further duty to cooperate discussions with Woking, Runnymede, Guildford and Royal Borough of Windsor & Maidenhead in May and June 2024.
- 7.33. Having regard to the officer discussions and engagement that had taken place with neighbouring authorities on this issue and the remaining challenges in meeting needs, the Council's Homes, Planning & Enforcement Portfolio holder wrote to all Portfolio holders in neighbouring authorities in July 2024 (letter in Appendix 11) again asking whether any authority would be able to help meet unmet needs.



- 7.34. Whilst a number of the duty to cooperate body responses encouraged or supported the Council in identifying sites to meet its own needs, the Council has so far been unable to identify sufficient sites to meet Gypsy and Traveller needs in the Borough over the plan period. Communication with other authorities under the Duty-to-Cooperate has established that there is no capacity for other authorities to assist in meeting this unmet need either due to their own need and constraints and/or the stage plan making has reached.
- 7.35. The Council has amended relevant Local Plan policies to allow greater flexibility for the provision of Gypsy and Traveller and Travelling Showpeople sites to come forward over the plan period. This includes a requirement for Gypsy and Traveller accommodation to be provided on sites of 100 homes or more (subject to other policy requirements).

### **Outcomes to Date**

- 7.36. The Council has carried out a robust approach to identifying sites to meet identified needs as set out in the Gypsy and Traveller and Travelling Showpeople Topic Paper and Site Identification Paper. On further investigation a number of sites identified in the 2022 consultation documents have proven not to be deliverable.
- ◆ On-going co-operation and engagement with relevant duty to cooperate bodies regarding the challenges of finding sites and the presence of unmet needs;
  - ◆ Inclusion of a flexible policy approach in the local plan which has been shared and discussed with relevant duty to cooperate bodies.



## Matter 3 - Delivering Economic growth including retail

### What is the Strategic cross boundary matter?

7.37. The strategic planning issue is:

- ◆ The identification of future employment needs
- ◆ To ensure sufficient employment land and buildings are available to meet needs
- ◆ To determine the impact of any retail and town centre development proposed within the Borough on other centres.

### Who has been involved and arrangements for co-operation

7.38. Planning Practice Guidance (PPG) requires authorities to assess their economic development needs working with other local authorities in the relevant functional economic market area.

7.39. Surrey Heath is located within the former Enterprise M3 Local Economic Partnership area and has been identified as lying within a Hart, Rushmoor, Surrey Heath Functional Economic Area (FEA), and has therefore engaged predominantly with those organisations.

7.40. A Town Centre Uses and Future Directions Study has been prepared by consultants to support the Local Plan. This included extensive telephone surveys, including of people outside the Borough, and an assessment of adjoining retail centres.

### How the issue has been addressed

7.41. A joint Hart/Rushmoor/Surrey Heath Employment Land Review was prepared in 2015 and informed the Rushmoor and Hart Local Plans. An Employment Land Review update was prepared by the three authorities in 2016. This formed the basis for a Surrey Heath Employment Land Technical Paper Update, 2020 undertaken by consultants on behalf of Surrey Heath BC to provide updated economic information to inform the Surrey Heath Local Plan. The Update Paper was subject to consultation with Hart and Rushmoor and the EM3 LEP.

7.42. The Council has worked closely with the EM3LEP to ensure that the Borough plays a role in contributing to economic growth in the LEP area. This has included seeking funding from the LEP, joint projects such as highway and public realm improvements in Camberley, and input from the Borough Council into emerging strategic LEP documents such as the Local Industrial Strategy. As noted elsewhere in this document, from April 2024, the Government no longer funds LEPs and their functions have been devolved largely to upper tier authorities.





- 7.43. Camberley Town is the main retail and employment centre in the Borough. Based on the evidence of future needs, no additional retail capacity is proposed over the plan period over and above the reuse of vacant stock and this will not therefore impact on centres in other local authorities.
- 7.44. In 2023 the Council further updated the employment evidence base in the Surrey Heath Employment Land Technical Paper, 2023. This identified that there was a need for between 6,500 and 15,800 sqm office floorspace (E(g)I and E(g)(ii) use classes) and 38,000 to 63,000 sqm Industrial and Logistics floorspace (E(g)(iii), B2 and B8 use classes) over the plan period. After taking account of permissions granted, including outline permissions, up to February 2024 (as set out in the Employment topic paper), these forecasts are adjusted to a residual need for 11,000 to 20,300sqm of office floorspace and 4,600sqm to 22,600sqm of Industrial and Logistics floorspace over the plan period.
- 7.45. A further Employment Land Supply Assessment, 2023 considered the ability of the defined Strategic and Locally Important Employment Areas to accommodate additional development.
- 7.46. Overall, it is concluded that there is sufficient capacity within the borough, primarily through redevelopment within existing designated employment sites contributing to the borough's needs in respect of Industrial and Logistics uses. Forecast office needs are subject to a high degree of uncertainty of there being a net positive need. As a result of this work, including the further assessment of existing commitments, the Council is not seeking any unmet employment development needs to be met by other local authorities.
- 7.47. In response to the 2022 Draft Local Plan consultation, Runnymede Borough and the Royal Borough of Windsor & Maidenhead supported the approach to meeting employment needs. Runnymede also made comments on the Longcross employment site as set out under Matter 5. Some queries on employment provision and flooding matters were raised by the Environment Agency and resolved through duty to cooperate discussions as set out in the EA Statement of Common Ground. No other issues relating to economic or retail matters were raised by duty to cooperate bodies in relation to the spatial strategy or policies in the Draft Local Plan, 2022.



7.48. Two other local authorities have asked whether SHBC could help meet any unmet employment needs. In August 2021, Bracknell Forest identified a potential unmet need for industrial/warehousing. The Council responded that the emerging evidence at that time, coupled with constraints in the Borough meant that the Council did not anticipate there would be a surplus of supply that could meet unmet employment needs in Bracknell Forest. In October 2023, Wokingham Borough identified a potential shortfall in industrial warehousing land and asked whether Surrey Heath would be able to meet any unmet needs. In the light of existing constraints in the Borough and the emerging outcome of employment capacity work the Council responded that it was unable to help meet any unmet employment needs within Wokingham.

#### **Outcomes to date**

- ◆ An updated employment evidence base has been prepared for the Borough, building on work previously agreed with the FEA partners.
- ◆ Employment needs can be met within the Borough.
- ◆ No unresolved cross boundary matters relating to economic or retail development with core partners that would affect delivery of the Local Plan are identified at this time.



## Matter 4 – Thames Basin Heaths Special Protection Area (TBHSPA)

### What is the Strategic cross boundary matter?

- 7.49. The strategic planning matter is the protection of the integrity of the Thames Basin Heaths Special Protection Area (TBHSPA) whilst also planning for new development, particularly new housing.
- 7.50. The TBHSPA was designated in March 2005 and is protected from adverse impact by European and UK law. The TBHSPA is a network of heathland sites designated for their ability to provide a habitat for the internationally important bird species of woodlark, nightjar and Dartford Warbler. The TBHSPA spans 11 local authorities across Hampshire, Berkshire and Surrey.
- 7.51. Based on research, Natural England consider there is a cause and effect relationship between recreational use and Annex I heathland bird populations. This research indicates a number of mechanisms leading to impacts on breeding success. Ranging from direct mortality (such as people trampling on nests), to nest abandonment or predation due to frequent flushing of birds (by people and dogs), or avoidance of disturbed areas. A range of wider effects are also associated with more general urban pressures, including uncontrolled heathland fires, fragmentation and pollution of the heaths, and cat predation.
- 7.52. As a result, Natural England objected to all planning applications for a net increase in housing within 5km of the SPA and this led to the refusals of planning permissions until mitigation measures could be put in place. To ‘unlock’ future housing development, joint working between the affected local authorities, Natural England and other interested parties took place through the Joint Strategic Partnership (JSP) (see Table 2) to deliver a consistent approach to avoidance of harm and mitigation of impacts to ensure that new homes could be delivered within the affected local authorities without harming the heathland habitats. The cross-boundary impacts of visitors to the SPA has also meant that a co-ordinated approach is required.
- 7.53. The agreed mitigation (firstly set out in the South East Plan, Policy NRM6) comprises:
- Provision of Suitable Alternative Natural Greenspace (SANG) at agreed standards
  - Contributions towards Strategic Access Management and Monitoring arrangements.



- 7.54. The whole of Surrey Heath (and Rushmoor Borough) lies within 5km of the TBHSPA. This means that all net new dwellings must provide SPA mitigation measures as set out in the Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy Supplementary Planning Document, 2019. Surrey Heath does not have significant options for the provision of Suitable Alternative Natural Greenspace (SANG) and must therefore rely on joint working to help deliver sufficient SANG capacity to enable housing delivery.
- 7.55. A further issue relates to the impact of new development on air quality which may affect the integrity of the TBHSPA, including the cumulative impact.

**Who has been involved and arrangements for co-operation**

- 7.56. The Council has engaged with Natural England and other local authorities on this issue.
- 7.57. In addition to regular duty to cooperate meetings and/or engagement with the above bodies, the following regular working arrangements have been established (see Table 2 in Section 6 of this Statement):
- ◆ Thames Basin Heaths Joint Strategic Partnership (JSP) Board
  - ◆ Thames Basin Heaths Strategic Access Management and Monitoring Board
  - ◆ Thames Basin Heaths Officer Group
  - ◆ Thames Basin Heaths Access Management and Monitoring Partnership
- 7.58. Shared SANG already exists with Hart and Rushmoor Councils (Hawley Meadows SANG), and with Bracknell Forest Borough Council (Shepherds Meadow SANG). As set out below duty to cooperate discussions with relevant bodies have enabled additional shared SANG capacity.
- 7.59. In 2019, Hart, Rushmoor and Surrey Heath Councils were awarded funding by the former Ministry of Housing, Communities and Local Government (MHCLG) under the Joint Working Planning Delivery Fund to undertake joint work to investigate and seek to implement alternative and complementary avoidance and mitigation measures to those already agreed, which can be delivered in order to mitigate net new residential development within the three authorities. Working in partnership with Natural England the project was completed in January 2021 with recommendations including some modified SANG criteria and additional emphasis on the future use of SANG networks, linear and small sites to provide mitigation.



- 7.60. In October 2021 the Council wrote to all local Surrey and neighbouring local authorities regarding unmet housing needs as set out under Matter 1. The letter also asked whether the local authorities were able to assist in relation to the provision of additional SANG capacity. The outcome of this approach is set out in Appendix 5.
- 7.61. A Habitat Regulation Assessment, including an air quality assessment, has been undertaken to support the Plan taking account of discussions with Natural England on SPA related matters.

**How the issue has been addressed**

- 7.62. As part of the JSP and other groups referred to above, the Council has worked collaboratively in agreeing and delivering avoidance and mitigation measures to ensure protection of the TBHSPA. The above mechanisms ensure a co-ordinated approach to the monitoring and delivery of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring Arrangements (SAMM).
- 7.63. The relevant duty to cooperate bodies were consulted on the draft TBHSPA Local Plan Policy. Natural England has been engaged on potential SANG options, as well as on air quality monitoring issues relevant to the Habitat Regulation Assessment and meetings/correspondence including the following:

Date	Engagement type	Matters discussed
July 2021	Meeting	Discussion on SANG site opportunities in Surrey Heath.
August 2021	Meeting	Potential for additional SANG capacity at Diamond Ridge Woods
June 2022	Meeting	SANG capacity and Thames Basin Heaths matters.
July 2022	Email	Natural England confirmed that they were happy with the proposed approach to additional capacity at Diamond Ridge Woods, subject to improvements being made to the site.



Date	Engagement type	Matters discussed
September 2022	Meeting	Natural Englands response to the Regulation 18 consultation, SANG capacity and air quality modelling work.
November 2022	Email	Surrey Heath provided a draft SCG for discussion at the next meeting, scheduled for January 2023.
December 2022	Email	Natural England provided with a note on the outcomes of the Air Quality modelling, responded noting that they were happy with the general approach taken and would provide comments in January 2023.
January 2023	Meeting	Natural England provided feedback on air quality modelling, noting the need for an appropriate assessment for nitrogen increases and a follow up meeting with AECOM. Surrey Heath provided an update on SANG capacity for the Local Plan and Natural England were pleased to receive a positive update on SANG capacity. Agreed that SHBC would update the SOCG and circulate to Natural England.
February 2023	Meeting between NE and Aecom re the HRA	Follow up meeting to the one held on the 23 <sup>rd</sup> January. AECOM met with Natural England to discuss the detail of what was required for the appropriate assessment ahead of AECOM progressing work on this for the Habitat Regulation Assessment. AECOM proposed some further evidence gathering and rational to take this work forward, which was welcomed by Natural England.



Date	Engagement type	Matters discussed
June 2023	Email	NE confirmed that they can agree with the HRA conclusions that the Local Plan will have no adverse effect on the integrity of any European sites either alone, or in combination with other plans or projects in relation to atmospheric pollution.
July 2023	Emails	Several emails regarding minor changes to the SCG with NE confirming and signing this by email on 17/07/23.
September 2023	Emails	Email from NE confirming that a new site for SANG use in the west of the Borough would in principle provide an acceptable SANG.
January 2024	Meeting and site visit	Following the purchase of a new site for SANG in Surrey Heath by the Council, meeting and site visit arranged with NE to discuss steps for bringing the site forward. Noted that SCG would be updated on SANG provision.
April/May 2024	Emails	As above, correspondence agreeing an updated Statement of Common Ground.

7.64. Natural England made comments on the Draft Local Plan 2022, seeking evidence that there is enough mitigation to meet housing delivery. Further work was done on this matter as set out below and the Natural England position, that there is sufficient SANG capacity available is confirmed in the Statement of Common Ground which was first agreed in July 2023 and then updated in May 2024 to reflect a new SANG at St Catherine’s Road.



- 7.65. In May and October 2021 duty to cooperate meetings were held with Bracknell Forest Borough which specifically discussed the matter of shared SANG opportunities. This resulted in agreement in principle to further capacity from Bracknell Forest from the Shepherds Meadow SANG extension for about 500 homes. Further engagement on this matter has taken place including a meeting in October 2022 and with agreement to regular bi-monthly to quarterly meetings.
- 7.66. In March 2023, Bracknell Forest Councils Executive resolved to:
- “Enter into an agreement with Surrey Heath Borough Council (SHBC) for land at Shepherd Meadows to serve as further SANG capacity for up to 500 homes in the Borough of Surrey Heath<sup>1</sup>”
- 7.67. However, following agreement as set out below to additional capacity from Hart and the purchase of additional land for SANG by SHBC, correspondence was sent to BFBC in December 2023 confirming that additional SANG capacity was no longer needed.
- 7.68. In July 2022 a joint meeting was held with Hart and Rushmoor Councils to discuss the matter of shared SANG capacity. Both Surrey Heath and Rushmoor have constrained options for further SANG capacity (for Surrey Heath most specifically that has a catchment that covers the western part of the Borough where most future development is likely to take place). Hart has greater opportunity for SANG provision and it was agreed at that meeting that Surrey Heath and Rushmoor would put in writing the amount of SANG capacity that it would ideally seek from Hart, which SANG would be in the relevant catchments, and further information on the time periods over which that capacity would be needed. SHBC responded to this request in August 2022.
- 7.69. In December 2022, Hart District Council’s Cabinet agreed [in part]:
- ‘to agree a Memorandum of Agreement with Surrey Heath Borough Council which, subject to agreement over mitigating the ongoing cost to Hart of maintaining reserved SANG capacity, makes available SANG capacity to deliver approximately 850 homes (2,125 persons) within Surrey Heath’ and
- ‘Authorises the Executive Director – Place to engage constructively, actively and on an ongoing basis with both Rushmoor Borough Council and Surrey Heath Borough Council to jointly look at cross boundary issues associated with jointly procuring future SANG capacity’.

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<sup>1</sup> <https://democratic.bracknell-forest.gov.uk/ieListDocuments.aspx?CId=102&MId=11161&Ver=4>





- 7.70. Surrey Heath's Portfolio holder for Planning and Control attended the Hart Cabinet meeting and read a statement supporting the delivery of SANG capacity from Hart District and highlighting its importance to delivering new homes in Camberley Town Centre. Following a further joint officer meeting on 5<sup>th</sup> June 2023 work is now progressing with regards to completion of a Memorandum of Agreement in relation to securing SANG from Hart District. At that meeting Hart agreed that SANG can be allocated prior to the MoA being completed. SANG in Hart District will enable delivery of town centre sites identified in the Surrey Heath Local Plan and support development in the west of the Borough.
- 7.71. In November 2023, Surrey Heath Borough Council completed on the purchase of a 30ha site east of St Catherines Road for the purposes of creating a new SANG. Once operational, this could mitigate the impact of all development in the west of the Borough for the Local Plan period. It is expected that the site will be operational in 2025, and in the interim the agreed additional SANG capacity from Hart will meet needs arising.

#### **Outcomes to date**

- ◆ Production of a HRA, supported by Natural England, that demonstrates that any adverse effect on Natura 2000 sites, from proposed development in the Local Plan, including air quality, can be adequately mitigated;
- ◆ Agreed mitigation measures for all net new dwellings over the Plan period comprising the provision of Suitable Alternative Natural Greenspace (SANG) (see final bullet below) and the payment of financial contributions towards Strategic Access Management and Monitoring measures (SAMM) as reflected in Pre-Submission Local Plan Policy E1 and in the Councils adopted Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy SPD;
- ◆ Policy approaches for biodiversity and the TBHSPA, as well as overall SANG capacity agreed with Natural England as set out in the SCG04, 2024.
- ◆ Joint working on alternative mitigation measures recognising the constraints in delivering SANG across some authorities;
- ◆ Through discussions with Natural England, an existing SANG at Diamond Ridge Woods has been agreed as having additional capacity (subject to improvements to the site and amendments to the site area);
- ◆ A shared approach to SANG delivery enabling housing delivery in the Borough including:
  - Shepherds Meadows – capacity provided by Bracknell Forest Borough Council



- SANG capacity for approximately 850 homes to be provided from SANG within Hart District that will support homes in the western part of the Borough including Camberley Town Centre as set out in their Cabinet Minutes from December 2022 and agreed Statement of Common Ground 04, 2024.
- ◆ SANG capacity for approximately 1500 homes to be provided from new SANG in Frimley Green, expected to be operational in 2025.



## Matter 5 – Natural and Historic Environment and Green Belt

### What is the Strategic cross boundary matter?

- 7.72. Surrey Heath lies in a larger than local level countryside and landscape context which is characterised by the lowland sandy heaths of the Thames Basin Heaths as well as areas of woodland, meadows and freshwater habitats.
- 7.73. There are several SSSIs (also with European designations, as referred to in Matter 4) that cross boundaries, as well as rivers and canals including the Blackwater River and the River Bourne and the Basingstoke Canal SSSI. Nature conservation activities are required at a larger-than-local scale, in order to reverse past losses of natural habitat and species, with a particular focus on Lawton principles i.e. bigger, better and more joined up sites. Reconnecting wildlife rich areas is a particular cross-boundary aspect of nature conservation, as well as better managing existing 'good' e.g. SSSI areas which are cross administrative boundaries. Furthermore, there are several heritage assets that cross boundaries, including the Basingstoke Canal Conservation Area and the Bagshot Registered Park and Garden.

### Who has been involved and arrangements for co-operation

- 7.74. There are a number of partnerships that exist to deliver joint working and co-ordinated approaches. These include those relating to the geography of the Blackwater Valley, county-scale nature conservation and authorities affected by Green Belt constraints.
- 7.75. The Council is an active member of the Surrey Nature Partnership which works across Surrey championing the value of the natural environment in decision making. This involves the Council working with the Surrey Biodiversity Information Centre to maintain survey records for Local Wildlife Sites (Sites of Nature Conservation Importance) and with the Biodiversity Working Group, on the adoption of evidence-based policy advice for nature recovery through prioritised landscape-scale conservation action, as mapped by the Biodiversity Opportunity Areas, with objectives as described in the relevant policy statements<sup>2</sup>.

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<sup>2</sup> [https://surreynaturepartnership.files.wordpress.com/2019/10/appendix-4\\_thames-basin-heaths-biodiversity-opportunity-area-policy-statements.pdf](https://surreynaturepartnership.files.wordpress.com/2019/10/appendix-4_thames-basin-heaths-biodiversity-opportunity-area-policy-statements.pdf)



- 7.76. The Council is a Supporting Authority for the Surrey Local Nature Recovery Strategy and is in the early stages of working with the Responsible Authority (Surrey County Council), to develop the strategy, which will supersede the current Biodiversity Opportunity Areas. In relation to Biodiversity Net Gain, the Council is currently developing a proposal for a site at Windlemere, with the aspiration that this forms part of a portfolio of Biodiversity Gain sites across the county of Surrey and Thames Basin Heaths National Character Area.
- 7.77. The Blackwater Valley Countryside Partnership co-ordinates conservation and public engagement work in the Blackwater Valley on behalf of Surrey Heath Borough Council, Bracknell Forest Borough Council, Guildford Borough Council, Hampshire County Council, Hart District Council, Rushmoor Borough Council, Surrey County Council, Waverley Borough Council and Wokingham Borough Council as well as relevant Town Councils.
- 7.78. Strategic Green Belt planning matters are considered by the Surrey Planning Officers Group and Planning Working Group as appropriate.
- 7.79. Quarterly meetings of Conservation Group Surrey (COGS) attended by Historic England and Conservation Officers/Planning Officers across Surrey Boroughs and Districts to provide opportunity for discussion on planning applications and appeals, changes in legislation/processes and Heritage at Risk.

**How the issue has been addressed**

- 7.80. In July – August 2017 neighbouring authorities were consulted on the proposed methodology for a Green Belt and Countryside Study and comments incorporated into the final Study, October 2017. This supported the 2018 Local Plan Issues and Options and Preferred Approach consultation. Having regard to the plan-making stage other relevant neighbouring authorities had reached, it was not considered possible to do a joint study.
- 7.81. Historic England were consulted on an early draft of Local Plan Policy DH7 Heritage Assets and comments incorporated. Historic England supported Policy DH7: Heritage Assets in its response to the Draft Local Plan consultation.



- 7.82. Relevant bodies were consulted on the Reg18 Draft Local Plan policies. Detailed comments were received on Policy DH7: Heritage Assets from Surrey County Council and these have been incorporated into the Pre-Submission Local Plan and agreed through the Statement of Common Ground with SCC. Comments were received from Natural England, the Environment Agency and Surrey County Council on Policy E2: Biodiversity and Geodiversity and E3: Biodiversity Net Gain and these have been incorporated in the Pre-Submission Local Plan. These addressed a number of points, including increased emphasis on development resulting in enhancement/restoration of biodiversity, rather than limited to 'protection' i.e. avoiding further losses, as well as an inclusion of reference to the forthcoming Local Nature Recovery Strategy. The Council has also liaised with the local biodiversity records centre which is part of the Surrey Nature Partnership, in relation to Sites of Nature Conservation Importance, to ensure an accuracy and sufficiency of the supporting evidence base for local site designations.
- 7.83. A cross-boundary matter was raised in response to the Draft Local Plan by Runnymede Borough Council (RBC) relating to the boundary of the Green Belt at Longcross. RBC identified that the Longcross site straddles the shared boundary with the majority within Runnymede and allocated in the adopted Runnymede Local Plan to provide a new garden village known as Longcross Garden Village. In addition to suggesting a more consistent naming of the site, RBC asked whether consideration had been given to taking the part of the site that lies within Surrey Heath out of the Green Belt given that the part of the site located in Runnymede is now located in the urban area. It was considered that this would assist in ensuring that a defensible Green Belt boundary is created perhaps using Burma Road as the boundary.
- 7.84. The Council has reviewed this site and as set out in the Pre-Submission Local Plan and the Green Belt Exceptional Circumstances Topic Paper, has removed this site from the Green Belt and amended the Green Belt boundary. This was discussed with Runnymede Borough Council at a meeting in June 2024 as set out in Table 6.
- 7.85. No further outstanding matters have been identified to date pending any further comments on the Pre-Submission Local Plan.

#### **Outcomes to date**

- ◆ Input from Historic England and Surrey County Council into Local Plan heritage policies to ensure that they are robust and consistent with national policy and guidance.
- ◆ Resolution of cross boundary Green Belt issue with Runnymede Borough Council.



- ◆ Positive joint working arrangements set up to support delivery of Biodiversity Net Gain and implementation of Policy E3 and other requirements of the Environment Act including the development of a Local Nature Recovery Strategy for Surrey.
- ◆ No other strategic cross boundary matters on natural environment, heritage, or Green Belt issues raised by other duty to cooperate bodies to the Draft Local Plan Policies.



## Matter 6 – Flooding

### What is the Strategic cross boundary matter?

- 7.86. Flood risk is an issue that has the potential to cross administrative boundaries, where development in one area could potentially increase flood risk in another area.
- 7.87. The NPPF requires that the evidence base for the Local Plan includes a Strategic Flood Risk Assessment (SFRA). The SFRA provides the framework for applying the sequential and exception tests. It is important to ensure that in allocating land or determining applications, development, where possible, is located in areas at lowest risk of flooding.

### Who has been involved and arrangements for co-operation

- 7.88. The key partners are:
- ◆ Environment Agency
  - ◆ Surrey County Council: as Lead Local flood Authority
  - ◆ Thames Water

### How the issue has been addressed

- 7.89. On behalf of the Council, Capita has prepared a Strategic Flood Risk Assessment to support the Local Plan. Surrey County Council and the Environment Agency were consulted on the Draft SFRA and comments incorporated into the final version.
- 7.90. Surrey County Council also reviewed the draft flooding policy (Policy E6) prior to the Draft Plan being finalised and the Policy was amended based on comments received. The SFRA has been used to inform the site allocations process. Surrey County Council were also engaged on the matter of Flooding during the preparation of the Strategic Land Availability Assessment (SLAA). The County Council were sent details of the sites close to flood zone areas and assessments were updated accordingly.
- 7.91. The Environment Agency made a number of detailed comments on the draft Local Plan policies including Policy E6: Flood Risk. These were discussed at meetings (and subsequent email correspondence) on 14<sup>th</sup> and 28<sup>th</sup> November 2022. As a result, wording to a number of Policies and text was amended and a new Policy on Watercourses and Water Quality added (Policy E7). The EA also provided some updates to incorporate into the Infrastructure Delivery Plan.



- 7.92. A number of comments were also made on the flood risk policy by Surrey County Council with a number of amendments made to the Plan in response to these as set out in the Consultation Statement published alongside the Pre-Submission Local Plan. SCC also provided additional comments on the Flooding section of the IDP in June 2024.
- 7.93. Statements of Common Ground have been agreed with both the Environment Agency and Surrey County Council and are published alongside the Pre-Submission Local Plan. In preparing the EA Statement of Common Ground they identified a need for an updated Strategic Flood Risk Assessment which has been commissioned.
- 7.94. No other duty to cooperate body raised matters relating to flood risk in relation to the proposed spatial strategy or draft Local Plan policies.

#### **Outcomes to date**

- ◆ Preparation of an up-to-date SFRA agreed by key partners which has informed the Local Plan site allocations and Local Plan Policy E6 Flood Risk and Sustainable Drainage.
- ◆ Comments on the Regulation 18 Plan, 2022 have informed the Pre-Submission Local Plan policies, including representations from the Environment Agency resulting in an additional Policy on Watercourses and Water Quality.
- ◆ There are no unresolved cross boundary matters relating to flooding with other local authorities that have been raised at this time.





## Matter 7 – Transport

### What is the Strategic cross boundary matter?

- 7.95. One of the key strategic matters that the Council has to consider when preparing the Local Plan is whether the additional demand on the road network as a result of development can be accommodated and/or mitigated. Consideration needs to be given to the impact of proposed new development on the strategic highway network in Surrey Heath and in adjoining local authorities, particularly when considered cumulatively with development in other authorities.
- 7.96. In addition, consideration needs to be given to the delivery of measures to promote active travel and a shift towards more sustainable forms of travel in accordance with Local Plan policies. Delivering a modal shift may require cross boundary working with other local authorities, Surrey County Council and other relevant agencies.

### Who has been involved and arrangements for co-operation

- 7.97. The Council has used Surrey County Council to undertake the Strategic Highway Assessment for the Local Plan using their SINTRAM model with input from National Highways. Co-operation has been largely through face to face and virtual meetings and by email. Information on large developments in neighbouring authorities has also been used for the transport assessment.
- 7.98. Surrey County Council made comments on Draft Local Plan Policy IN2: Transportation which have been incorporated into the Pre-Submission Local Plan.
- 7.99. Duty to cooperate meetings with Woking and Runnymede Councils in 2021 highlighted transport as a potential cross boundary matter depending on the location and scale of sites to be allocated in the Surrey Heath Local Plan.
- 7.100. Surrey County Council, in partnership with the Borough Council, has prepared a Surrey Heath Local Cycling and Walking Infrastructure Plan (LCWIP). This has involved two rounds of online workshops with neighbouring local authorities as well as other stakeholders. Work undertaken for the LCWIP has also ensured that links are made with cycle routes in adjoining local authorities where an LCWIP is in place.



### How the issue has been addressed

7.101. SCC and the Council agreed the inputs into the Strategic Highway Assessment modelling with National Highways. The draft findings were also discussed with them at a meeting on 8 November 2022. The matters discussed, actions arising, and outcomes are recorded in a meeting note, the content of which was agreed by all parties. Following the meeting further information was exchanged via emails. This included information provided by SCC concerning the amount of M3 eastbound mainline traffic detouring the M3 via M3 Junction 3 in the DM and DS AM and PM peak hours because of modelled eastbound on-slip merge delays. National Highways set out that future modelling of M3 Junction 3 and operational analyses of the eastbound off-slip and on-slip arrangement should account for the detouring traffic, especially given the effect of such traffic on the predicted queuing on the eastbound off-slip. Subject to this point being taken into account, National Highways has agreed the findings and conclusions of the Strategic Highways Assessment Report.

7.102. A briefing on the findings of the Strategic Highways Assessment Report (SHAR) was held with neighbouring local authorities and Hampshire County Council on 21 September 2023. Invitees are listed below with those who attended in bold.

**Surrey County Council; Guildford Borough Council; Runnymede Borough Council; Woking Borough Council; Bracknell Forest; Royal Borough of Windsor and Maidenhead; Hampshire County Council; Hart District Council; Rushmoor Borough Council;** Civil Aviation Authority; Enterprise M3; Homes England; Mayor of London; Office of Rail and Road; Transport for London.

7.103. The Briefing set out the findings of the SHAR and provided the opportunity for questions. The Assessment did not show any significant impacts on the strategic road network such that it would impact adjoining local authorities. A follow up email was then sent to the relevant authorities including a copy of the briefing presentation and a copy of the draft Assessment and inviting any further comments.

7.104. Two further queries were raised on the SHAR which were responded to by SCC:

**RBW&M** – queried the impact on the junctions near the A329 London Road/Kings Road Ascot and whether the model took account of recent improvements.

**SCC response** – the modelling has not taken into account the recent improvements and should therefore be considered as the worst case.



**Woking** – raised a number of detailed points from Chobham Parish Council about road/transport links between Woking and Chobham. Also queried whether the modelling had considered potential impacts on the Bagshot Road/Brookwood Lye Road/Connaught Road junction as there are two site allocations in Woking required to mitigate development impacts and contribute to the improvement of this junction.

**SCC Response** – traffic flow changes at this junction would be modest at best and junction analysis indicates no deterioration in Level of Service at the junction as a result of the Surrey Heath Local Plan.

- 7.105. As set out under Matter 4, the traffic modelling has fed into the air quality assessment and the HRA that demonstrates that, as agreed with Natural England, any adverse effect on Natura 2000 sites, from proposed development in the Local Plan, including air quality, can be adequately mitigated.

#### **Outcomes to date**

- ◆ Preparation of a Strategic Highways Assessment Report for the Local Plan agreed with Surrey County Council and National Highways identifying the impact of the spatial strategy on the strategic highway network;
- ◆ Presentation to other relevant local authorities that there is no significant impact on the strategic road network arising from the spatial strategy set out in the emerging Surrey Heath Local Plan and opportunities for issues to be raised at the briefing or through a follow up email which included a copy of the draft SHAR. No significant concerns raised at this stage, although of note is that Hart District Council has set out that it will respond to the SHAR at Regulation 19 in consultation with Hampshire County Council as Highway Authority;
- ◆ Modelling to enable the consideration of air quality matters on the TBHSPA;
- ◆ Input by neighbouring authorities into the LCWIP; and,
- ◆ Informed the IDP.



## Matter 8 – Social infrastructure including Healthcare and Education

### What is the Strategic cross boundary matter?

7.106. The Strategic matters are:

- ◆ the need to address any cross-boundary health issues, particularly health related infrastructure and future requirements arising as a result of Surrey Heath's Local Plan and neighbouring Local Plans.
- ◆ The need to determine future education requirements arising from the Local Plan and any cross boundary impacts that may arise from this.

### Who has been involved and arrangements for co-operation

7.107. Surrey Heath lies within the NHS Frimley and NHS Surrey Heartlands Integrated Care Boards (formerly Frimley and Surrey Heartlands CCGs). Meetings with the then CCG took place prior to the Local Plan Issues and Options consultation 2018 and prior to the Draft Plan consultation 2022. Meetings have also been held with Frimley NHS Foundation Trust. The Council also attends the Surrey Planning and Health Forum to consider wider health issues.

7.108. As set out elsewhere, in May 2023 the replacement of Frimley Park Hospital was named as a scheme in the New Hospitals Programme. This may have potential long term cross boundary issues but at present there is no public information regarding any potential new site or plans for the re-use of the current site.

7.109. Surrey County Council is the Local Education Authority and has been engaged in the Local Plan process through a mixture of virtual meetings and written correspondence.

### How the issue has been addressed

7.110. In December 2021, a letter was sent to infrastructure providers including those relating to education and health setting out the proposed spatial strategy and seeking views on the impact on future infrastructure needs. Infrastructure providers were also consulted on the Surrey Heath Issues and Options consultation in 2018 and the Draft Local Plan consultations in 2022. Further consultation took place with relevant providers on a draft Infrastructure Delivery Plan in May 2024. Meetings have also been held with health and education providers as set out in Table 6.



Healthcare

- 7.111. A duty to cooperate meeting was held in January 2022 with Frimley Health NHS Trust regarding the draft spatial strategy and the draft Local Plan Policy for Frimley Park Hospital.
- 7.112. The issue has been discussed through face-to-face meetings and emails. In relation to the December 2021 letter, a response on infrastructure needs was received from both Frimley ICB and Frimley Health NHS Trust. These both indicated additional pressure on health services.
- 7.113. NHS Frimley ICB (then CCG) also responded to the Regulation 18 Draft Local Plan consultation setting out the impact of new housing on GP capacity. A further meeting was held with Frimley NHS Foundation Trust and NHS Frimley ICB in January 2023. This largely focused on the CIL application process. A further meeting with NHS Frimley ICB in March 2023 discussed the impact of development in the Local Plan on GP services.
- 7.114. In August 2023 a combined response was received from Surrey Heartlands ICS and Frimley ICS on healthcare requirements. A further response on healthcare requirements was received from Frimley ICS in May 2024 following circulation of the draft Infrastructure Delivery Plan (IDP) to infrastructure providers. Whilst this confirmed additional pressures on GP services and potential costs of increasing capacity, it also set out that actual mitigation on housing sites will be calculated in detail based on the specific needs of the ICB at the time of any planning application. NHS Surrey Heartlands ICB also responded, providing some suggested amendments to the IDP text and these responses have informed the IDP.

Education

- 7.115. In relation to education, a number of meetings have been held with SCC as education authority as set out below. SCC responded to the December 2021 letter and provided text for inclusion within the Infrastructure Delivery Plan on education matters.

8<sup>th</sup> September 2022 – SCC meeting regarding primary and secondary capacity

1 November 2022 – SCC meeting re Early Years provision

1 December 2022 – SCC meeting re Early Years provision



- 7.116. SCC advised at that time that there is no need for additional primary and secondary education provision arising from the Local Plan allocations. Additional Early Years provision will be required which will largely be market led. There is additional capacity required for SEND facilities across Surrey, including within the Northwest Surrey area within which Surrey Heath sits and this will be delivered through the County Council's Capital programme.
- 7.117. A further copy of the Draft IDP was sent to SCC in May 2024 and a response received on education requirements and providing some updates to incorporate into the IDP. This suggested that there is some pressure on secondary places which would be kept under review. Wording in the IDP on education matters has been agreed with SCC.
- 7.118. No other local authority raised health or education delivery as a strategic cross boundary matter in response to the Draft Local Plan.

#### **Outcomes to date**

- ◆ Preparation of an Infrastructure Delivery Plan (IDP) identifying known capacity and details of any known or planned provision including input from Surrey County Council as Education Authority, Frimley NHS Foundation Trust, NHS Surrey Heartlands ICS and NHS Frimley ICS.
- ◆ Confirmation from SCC as local education authority on capacity in existing schools to meet provision for primary and secondary places over the Plan period as well as requirements for Early Years and SEND provision.
- ◆ Discussion with the health authorities with regards to the bidding process for CIL funding.
- ◆ Delivery of infrastructure is set out in Local Plan Policy INI and has been updated to reflect comments from SCC. This seeks to ensure that infrastructure is provided in a timely manner and that development includes the provision of, or meets the reasonable costs of, providing necessary infrastructure to address needs arising from the development.
- ◆ Inclusion of a specific Policy covering Frimley Park Hospital with amendments following comments from Frimley NHS Foundation Trust.



## Matter 9 – Utilities including water and waste water

### What is the Strategic cross boundary matter?

- 7.119. Whilst Utility providers are not duty to cooperate bodies, as set out in the D2C Scoping, they are statutory consultees on the Local Plan. There is also a need to consider any cross boundary water supply and waste water issues so that future requirements can be met.

### Who has been involved and arrangements for co-operation

- 7.120. The Council has engaged with the Environment Agency, and relevant neighbouring local authorities on this issue as well as a specific meeting with South East Water and the provision to them of information on SLAA sites. Utility providers were contacted in December 2021 setting out the proposed spatial strategy and seeking views on the impacts on infrastructure provision and were also consulted on the Regulation 18 Local Plan in 2022. A draft IDP was circulated to infrastructure providers for comment in May 2024
- 7.121. Engagement has also taken place with Thames Water as the wastewater undertaker for Surrey Heath Borough.

### How the issue has been addressed

- 7.122. The Council prepared a joint Water Cycle Study in 2017 with Hart, Rushmoor, HCC, SCC, Environment Agency, Natural England and Thames Water. Engagement has also taken place with water companies and other utility providers as part of ongoing work in support of the Infrastructure Delivery Plan.
- 7.123. In response to the 2018 Reg 18 stage, the Environment Agency commented that a Water Cycle Study should be undertaken.
- 7.124. Comments from utility providers including South East Water, Thames Water and the Environment Agency have fed in to the Infrastructure Delivery Plan and the Local Plan policies. A meeting was held with South East Water in July 2023 which identified that the area is fairly resilient in terms of water supply although improvements will be needed in the longer term (beyond the Plan period).



- 7.125. In relation to the Gypsy, Traveller and Travelling Showpeople Allocations consultation, August 2022, Thames Water made detailed comments on the proposed gypsy and traveller site at Land South of Broadford Lane which is located directly adjacent to the Chobham Sewage Treatment works. In particular, concerns were raised around the management of odour impacts. Further evidence including an Odour Assessment was prepared and a meeting held with Thames Water on 27<sup>th</sup> November 2023. Following completion of the evidence, and discussions with Thames Water it was determined that the challenges associated with Land South of Broadford Lane represent significant barriers to the deliverability of the site and it is no longer taken forwards into the Reg19 Local Plan.
- 7.126. Statements of Common Ground have been agreed with Thames Water and the Environment Agency.

**Outcomes to date**

- ◆ Preparation of a Water Cycle Study
- ◆ Preparation of relevant sections of the IDP supported by input from relevant partners, to ensure that it can be demonstrated that the Local Plan is deliverable.
- ◆ Inclusion of a policy within the Local Plan to address water efficiency standards as recommended by the WCS
- ◆ Detailed input into site allocations.
- ◆ No significant cross boundary matters have been raised by duty to cooperate bodies.





## Matter 10 - Climate Change

### What is the Strategic Cross Boundary Matter

- 7.127. Climate change is a wide-ranging global matter and one of the greatest challenges facing our society which needs to be addressed on a wide scale. Along with many other adjoining and Surrey authorities, the Council has declared a Climate Emergency and pledged to contribute to making the Borough net zero by 2050. Local Plan policies seek to ensure that development contributes to the mitigation of, and adaptation to, climate change, with adaptation and mitigation measures relating to a number of the individual Matters previously set out, including Flooding, Health, the Natural Environment and Transport.
- 7.128. There is a need for joint working across boundaries relating to the strategic planning matters relevant to climate change in order to achieve the significant carbon reduction targets within the Local Plan and deliver the national target of net zero carbon emissions by 2050.
- 7.129. Matters relating to climate change cross over with other strategic matters including Flooding, the Natural Environment and Transport.

### Who has been involved and arrangements for co-operation

- 7.130. The Surrey Climate Change Strategy adopted by Surrey County Council sets out the goal to achieve net zero by 2050 and provides a joint framework for collaborative action on climate change across Surrey's local authorities and other partners. As part of this strategy, Surrey Heath Borough Council has been involved in joint working with Surrey authorities, with Surrey Heath Officers attending a monthly Climate Change Officers Meeting covering different topics relating to climate change.
- 7.131. The Borough Council has also established a Climate Change Working Group who play a key role in the development of the Surrey Heath Borough Council Climate Change Action Plan. The Action Plan draws directly on the Surrey Climate Change Strategy and supports the shared ambition of Surrey's 12 local authorities and sets out the collective approach to tackle climate change.

### How the issue has been addressed

- 7.132. A Surrey Heath Climate Change Study (2020) was produced to explore ways in which climate change objectives can be effectively addressed through the Local Plan. This has informed the Local Plan policies relating to Climate Change mitigation and adaptation.



- 7.133. The Climate Change Officers Meeting held by Surrey County Council has allowed for co-operation on strategic climate change issues in Surrey and has facilitated discussions on issues including Electric Vehicle Charging Points and net zero targets, and has allowed Surrey County Council to keep Officers updated on the SCC Greener Futures delivery and development.
- 7.134. There was general support from duty to cooperate bodies for the climate change policies and ambitions in the emerging Local Plan.

### **Outcomes to date**

- 7.135. The Surrey Heath Climate Change Study (2020) makes clear that achieving net zero carbon emissions will require interventions beyond the scope of the Local Plan in respect of a number of areas, such as supporting electric vehicle uptake and new energy infrastructure. Ongoing collaborative working with Surrey and neighbouring authorities is required in order to address these matters. The Surrey partnerships (within the Climate Change Officers Meeting) have facilitated the delivery of county wide projects such as the Solar Together scheme.
- ◆ Surrey Heath Borough Council continues to work collaboratively with other Surrey authorities including the County Council.



## 8. Summary of Co-operation

- 8.1. Table 6 below sets out a high-level summary of the partnership engagement to date on strategic planning matters with adjoining local authorities, Surrey County Council and duty to cooperate agencies.
- 8.2. The Appendices include summaries of responses to duty to cooperate letters received from neighbouring and Surrey local authorities in response to the matter of unmet housing needs, gypsy and travellers and travelling showpeople needs and SANG provision.
- 8.3. Comments made on the Draft Surrey Heath Local Plan: Preferred Options (2019 - 2038), 2022 and consultation on the Further Gypsy and Traveller and Travelling Showpeople Allocations, 2022, along with duty to cooperate discussions, have been used to inform the Pre-Submission version of the Local Plan.
- 8.4. Further details on all consultation responses can be found in the Council's Consultation Statement and Appendices available from the Local Plan webpage.





Table 6: Summary of engagement with duty to cooperate bodies up to Pre-Submission

## 6a. Bracknell Forest Borough Council

Date	Summary of key elements of co-operation to date
July 2024	Letter from SHBC Portfolio Holder to BFB Portfolio holder regarding help with meeting unmet Gypsy and Traveller and Travelling Showpeople needs.
June 2024	<p>Online meeting to discuss strategic cross boundary planning matters in advance of the SHB Reg19 being published. Agreed outcomes were:</p> <ul style="list-style-type: none"> <li>• SHBC updated BFC on their latest Local Development Scheme</li> <li>• BFC updated SHBC on their recent and current activities to get Local Plan adopted and to draft supporting documents. These points were noted by SHBC.</li> <li>• In relation to the forthcoming publication of the Surrey Heath Local Plan Pre-submission version, it was noted that the contents of the <b>draft</b> Statement of Common Ground were noted, in particular: <ul style="list-style-type: none"> <li>○ no unmet needs for housing supply in Surrey Heath, as shortfall has been agreed to be addressed via agreement with Hart DC.</li> <li>○ no request from SHBC for BFC to support Surrey Heath in supply of employment floorspace, as residual forecast need for industrial and logistics floorspace is relatively modest and residual forecast need for office floorspace is not considered to be representative of actual market demand</li> <li>○ no request from SHBC for SANG capacity to be provided by BFC</li> <li>○ whilst it is recognised that there are unmet needs, the flexible Policy approach explained in the Gypsy and Traveller and Travelling Showpeople briefing is welcomed.</li> <li>○ Transport Assessment concluded that there are no significant adverse effects on the highways network in Bracknell Forest, arising from Surrey Heath site allocations.</li> </ul> </li> </ul>



Date	Summary of key elements of co-operation to date
	<ul style="list-style-type: none"> <li>○ Habitat Regulations Assessment including Appropriate Assessment, concluded no adverse impact on the Thames Basin Heaths SPA.</li> <li>● SHBC and BFC agreed that at the current time there are no outstanding cross boundary issues that would affect the SHLP, with the exception of meeting needs for Gypsy and Travellers. It is recognised that both Authorities have unmet need and that SHBC is seeking to address this by pursuing the flexible Policy approach explained in the Gypsy and Traveller and Travelling Showpeople briefing.</li> <li>● Final Statement of Common Ground will be signed later in 2024, prior to SHBC's submission of plan to Inspector.</li> </ul>
Dec 2023	Correspondence with BFC noting that in light of the recent successful acquisition of the SANG in the west of Surrey Heath, it is no longer necessary for Surrey Heath Borough Council to acquire additional SANG from Bracknell.
Oct 2023	Letter sent to BFB regarding unmet Gypsy and Traveller Needs as set out in Matter 2 and Appendices 9 and 10.
Sept 2023	Email sent to BFB with copies of the draft Strategic Highway Assessment Report for any comment.
Sept 2023	BFB attended Transport and Gypsy and Traveller Duty to Cooperate briefings.
2022/23	Meetings regarding strategic cross boundary matters especially SANG capacity.
Sept 2022	Duty to Cooperate meeting. Agreed outcomes were: <ul style="list-style-type: none"> <li>● Agreement in principle that there is available SANG capacity within Bracknell Forest to support developments in Surrey Heath.</li> <li>● Agreement to find a mechanism to move the SANG capacity matter forwards with further meetings.</li> <li>● Clarification regarding unmet housing and employment needs in Surrey Heath.</li> <li>● Clarification regarding the nature of proposed Gypsy and Traveller and Travelling Showpeople sites in Surrey Heath.</li> </ul>



Date	Summary of key elements of co-operation to date
	<ul style="list-style-type: none"> <li data-bbox="443 248 1897 328">• Agreement on the need to take BFB developments and air quality modelling into account in the SHB TA and air quality modelling.</li> </ul>
Aug 2022	Letter sent to BFC regarding meeting unmet gypsy and traveller and travelling showpeople needs in Surrey Heath as set out under Matter 2 and Appendices 7 and 8.
Spring and Summer 2022	Reg 18 Draft Local Plan consultations – no response received.
May 2021	Duty to cooperate meeting regarding SHBC response to the BFBLP Reg 19 consultation and matters of unmet housing need and SANG
April 2021	SHBC responded to the BFBLP Reg19 consultation and related correspondence and a Statement of Common Ground relating to strategic matters was agreed in December 2021 to support the submission of the BF Local Plan.
2020/2021	Written correspondence with regards to unmet needs in Surrey Heath as set out under Matter 1 and Appendices 3,4 and 5.
2020/2021	Responded to letters from Bracknell Forest relating to infrastructure matters (SHBC response Oct 2020), and to unmet industrial warehousing needs in Bracknell Forest (SHBC response September 2021). In the response dated October 2020 the Council took the opportunity to identify a likely shortfall in housing capacity and raise the matter of unmet needs with Bracknell Forest.
Dec 2020	Letter sent regarding likely unmet needs in Surrey Heath.



Date	Summary of key elements of co-operation to date
2018	SHLP Reg 18 Consultation 2018 – responded that had no objection to the approach to meeting housing need across the Hart, Rushmoor, Surrey Heath HMA, and would wish to be kept updated on the progress to meet Gypsy and Traveller provision. Comments were also made regarding the need to take account of impacts of air quality on European/Natura 2000 sites, and the potential for development to impact upon the strategic road network within Bracknell Forest.
Ongoing	The Council works with BFBC as part of the TBH partnership. BFC has provided SANG capacity at Shepherds Meadow for developments in SHB as set out in Matter 4.

#### 6b. Enterprise M3 LEP

Date	Summary of key elements of co-operation to date
April 2024	No further correspondence with LEP as organisation disbanded and economic development responsibilities reassigned to Surrey County Council.
Spring and Summer 2022	Draft Local Plan consultations – no response made.
2018	Reg 18 Consultation 2018 – no response made.





**6c. Environment Agency**

Date	Summary of key elements of co-operation to date
General	The EA has had an input into the emerging Local Plan, environmental studies (SA/SEA and HRA) and technical studies, particularly the SFRA.
July 2024	Agreed a Statement of Common Ground regarding representations made to the Regulation 18 Local Plan.
2023	Input into the IDP via emails.
November and December 2022	<p>Two meetings and related correspondence to discuss the EA representations and SHBC proposed response.</p> <p>Agreed Outcomes from 14<sup>th</sup> November meeting:</p> <ul style="list-style-type: none"> <li>• General high level discussion of the EA representations and the Councils response</li> <li>• Agreement to further detailed comments to be provided by the EA by 28 November</li> <li>• Agreement to a further meeting</li> <li>• Agreement that the EA will input into the Infrastructure Delivery Plan</li> </ul>
Spring and Summer 2022	Reg 18 Draft Local Plan consultations – details comments received, including on the Housing Allocations (HA1 – HA4), Policy E6 Flood Risk and Sustainable Drainage, Policy IN1 Infrastructure Delivery, Biodiversity Policies EN2 and EN3 and Employment Policies ER2 and ER3. Comments were also made on flooding incidents on the proposed Gypsy and Traveller and Travelling Showpeople allocations.
2018	Reg 18 Consultation 2018 – responded in support of the Vision with suggested additional Objective on water quality. Advise that the strategy must be supported by an SFRA and Water Cycle Study and all proposed sites must be assessed in terms of flood risk. Traveller sites should not be supported in Flood Zone 2 and employment sites will



Date	Summary of key elements of co-operation to date
	need to be informed by the Sequential Test. The approach to flood risk, green infrastructure and biodiversity is supported

#### 6d. NHS Frimley Integrated Care Board

Date	Summary of key elements of co-operation to date
May 2024	Comments on the draft Infrastructure Delivery Plan
March 2023	Meeting held with focus on GP Practices
January 2023	Meeting held along with Frimley NHS Foundation Trust with a focus on Surrey Heath bidding process and needs from Frimley Park Hospital.
Spring and Summer 2022	Reg 18 Draft Local Plan consultations – comments received setting out the impact of the proposed spatial strategy on health facilities, particularly GP provision.
December 2021	Invited to comment on the impact of Draft Spatial Strategy. Response fed into Draft IDP.

#### 6e. Guildford Borough Council

Date	Summary of key elements of co-operation to date
July 2024	Letter from SHBC Portfolio Holder to GBC Portfolio holder regarding help with meeting unmet Gypsy and Traveller and Travelling Showpeople needs.



Date	Summary of key elements of co-operation to date
11 June 2024	<p>Online meeting to discuss strategic cross boundary planning matters in advance of the SHB Reg19 being published.</p> <p>Outcomes were:</p> <ul style="list-style-type: none"> <li>• SHBC updated GBC on their Local Development Scheme.</li> <li>• GBC highlighted that the authority reviewed current Local Plan part 1 which is now 5 years old and a decision has been made that it requires updating.</li> <li>• In relation to the forthcoming publication of the Surrey Heath Local Plan Pre-submission version, it was noted that: <ul style="list-style-type: none"> <li>○ no unmet needs for housing supply in Surrey Heath, as shortfall has been agreed to be addressed via agreement with Hart DC.</li> <li>○ no request from SHBC for GBC to support Surrey Heath in supply of employment floorspace, as residual forecast need for industrial and logistics floorspace is relatively modest and residual forecast need for office floorspace is not considered to be representative of actual market demand</li> <li>○ no request from SHBC for SANG capacity to be provided by GBC</li> <li>○ whilst it is recognised that there are unmet needs, the flexible Policy approach explained in the Gypsy and Traveller and Travelling Showpeople briefing is welcomed</li> <li>○ Transport Assessment concluded that there are no significant adverse effects on the highways network in Guildford, arising from Surrey Heath site allocations.</li> <li>○ Habitat Regulations Assessment including Appropriate Assessment, concluded no adverse impact on the Thames Basin Heaths SPA.</li> <li>○ SHBC and GBC agreed that at the current time there are no outstanding cross boundary issues that would affect the SHLP, with the exception of meeting needs for Gypsy and Travellers.</li> </ul> </li> </ul> <p>A Statement of Common Ground will be drafted later in 2024, prior to Submission of the Local Plan.</p>



Date	Summary of key elements of co-operation to date
Oct 2023	Letter sent to GBC regarding unmet Gypsy and Traveller Needs as set out in Matter 2 and Appendices 9 and 10.
Sept 2023	Email sent to GBC with copies of the draft Strategic Highway Assessment Report for any comment.
September 2023	Attended briefings on the Strategic Highway Assessment and Gypsy and Traveller and Travelling Showpeople needs.
18 <sup>th</sup> October 2022	Duty to cooperate meeting to discuss GBC representations particularly regarding SHBC's shortfall of pitches and plots and concerns regarding meeting the accommodation needs of Gypsy and Traveller households who do not meet the PPTS definition. Outcome – SHBC will need to demonstrate the extent of work undertaken to meet needs. Other identified duty to Cooperate matters discussed but no significant cross boundary matters were identified.
August 2022	Letter sent to GBC regarding meeting unmet gypsy and traveller and travelling showpeople needs in Surrey Heath as set out under Matter 2 and Appendices 7 and 8.
Spring and Summer 2022	Reg 18 Draft Local Plan consultations – comments received on both consultations including comments on Gypsy and Traveller and Travelling Showpeople provision and meeting needs.
2020/2021	Written correspondence with regards to unmet needs in Surrey Heath as set out under Matter 1 and Appendices 3,4 and 5.
Dec 2020	Letter sent regarding likely unmet needs in Surrey Heath.
2018	Reg 18 Consultation 2018 - responded in support of housing needs being met across the HMA, with the suggestion of possible inclusion of Green Belt reserve sites if HMA partners cannot meet need. Suggest that amendments to Green Belt boundaries should not be ruled out to meet gypsy and traveller needs. The approach to biodiversity



Date	Summary of key elements of co-operation to date
	should include recent work by the Surrey Nature Partnership and notes that joint work is being undertaken on the potential clean air zone on the A331. The approach to transport infrastructure is supported.
Ongoing	The Council works with GBC as part of the TBH partnership. BFBC has provided SANG capacity at Shepherds Meadow for developments in SHB as set out in Matter 4.

**6f. Hart District Council**

Date	Summary of key elements of co-operation to date
July 2024	Statement of Common Ground agreed alongside the Pre-Submission Surrey Heath Local Plan predominantly covering matters of housing and the Thames Basin Heaths Special Protection Area. This confirms delivery from HDC of 533 homes over the overlapping plan periods to meet unmet needs in Surrey Heath.
19 July 2024	Portfolio holder meeting to discuss the SCG and cross-boundary matters
10 July 2024	Letter from SHBC Portfolio Holder to HDC Portfolio holder regarding help with meeting unmet Gypsy and Traveller and Travelling Showpeople needs.
March 2024	MoA agreed regarding the provision of shared SANG capacity from SANG in Hart to support new homes in Surrey Heath.
Dec 2023	<p>D2C meeting with Rushmoor BC. Outcomes were:</p> <ul style="list-style-type: none"> <li>• Shared Local Plan update</li> <li>• Shared update on local housing needs including discussion around continuation of an HMA</li> <li>• Update on Gypsy and Traveller and Travelling Showpeople need and capacity</li> </ul>



Date	Summary of key elements of co-operation to date
	<ul style="list-style-type: none"> <li>• Discussion on employment needs and in particular recognition that logistics and strategic hubs are a sub-regional issue</li> <li>• Update on the Surrey Heath Transport Assessment and on progress of LCWIPs</li> <li>• Update on SANG capacity and on shared SANG</li> <li>• Updates on implementing BNG in each authority</li> </ul>
Oct 2023	Letter sent to HDC regarding unmet Gypsy and Traveller Needs as set out in Matter 2 and Appendices 9 and 10.
Sept 2023	Email sent to HDC with copies of the draft Strategic Highway Assessment Report for any comment.
Sept 2023	Attended briefings on the Strategic Highway Assessment and Gypsy and Traveller and Travelling Showpeople needs.
Sept 2023	D2C Officers meeting see Matter 1 for outcomes.
June 2023	Joint SANG meeting to agree a way forward for shared SANG. It was agreed that a memorandum of Agreement would be prepared and signed by Hart and SHBC for SANG capacity for about 700 homes.
Sept 2022	D2C Officers meeting see Matter 1 for outcomes.
August 2022	Letter sent to GBC regarding meeting unmet gypsy and traveller and travelling showpeople needs in Surrey Heath as set out under Matter 2 and Appendices 7 and 8.
Spring & Summer 2022	Reg 18 Draft Local Plan consultations – comments received on both consultations including general comments on the duty to cooperate and around the spatial strategy, unmet need and references to the Housing Market Area. Comments also encouraged the Borough’s gypsy and traveller and travelling showpeople needs to be met in full.



Date	Summary of key elements of co-operation to date
March 2022	Agreement to a Statement of Common Ground to support the Reg 18 SHBLP
July 2022	Joint meeting with Hart and Rushmoor regarding SANG capacity – see outcomes under Matter 1.
October 2021	Letter regarding unmet housing needs, traveller needs and SANG – see Appendices 6 and 7.
June 2021	D2C Officers meeting see Matter 1 for outcomes.
Dec 2020	Letter sent regarding likely unmet needs in Surrey Heath.
Dec 2018	SHBC attended the Hart Local Plan Examination
Nov 2018	<p>Statement of Common Ground agreed between Hart, Rushmoor and Surrey Heath to support the Hart Local Plan. Agreed outcomes were:</p> <p>The three Councils confirm that:</p> <ul style="list-style-type: none"> <li>a) For the purposes of establishing objectively assessed housing need in Hart, the OAHN from the SMA 2016 provides a robust and relevant evidence base;</li> <li>b) The scale of the shortfall in Surrey Heath has yet to be determined and that this should be referred to in the Hart Local Plan (if necessary through a Proposed Modification);</li> <li>c) In light of this uncertainty the Hart Local Plan takes a reasonable approach to unmet needs by planning over and above OHN, in particular, the commitment to plan for a new settlement at Murrell Green/Winchfield;</li> <li>d) The three authorities consider they are in accordance with the Duty to Cooperate in maintaining effective co-operation and are taking steps to meet identified needs in the SHMA area as a positive outcome required by Guidance;</li> <li>e) All three authorities will continue to meaningfully engage at both officer and Member level, under</li> </ul>



Date	Summary of key elements of co-operation to date
	the duty to cooperate to ensure housing need is addressed across the SHMA and to e detailed in a NPPG compliant Statement of Common Ground as soon as practical. Member engagement will continue through the Joint Member liaison Group referred to in the Hart Duty to Cooperate Statement.
June 2018	Reg 18 Consultation 2018 – HDC responded with concerns that to date insufficient work has been done to try and meet housing needs in the Borough and raised concerns with the SLAA methodology. The future role of the HMA under the revised NPPF was also raised.
March 2018	SHBC responded to the Hart Local Plan Strategy and Sites Proposed submission consultation setting out the level of likely housing shortfall against the SHMA requirements and the proposed standard method. Set out that in the light of Harts proposed housing supply it was considered that any unmet needs arising from Surrey Heath can be addressed elsewhere in the HMA.
Ongoing	The Council works with HDC as part of the TBH partnership as set out in Matter 4.

### 6g. National Highways

Date	Summary of key elements of co-operation to date
June 2024	Agreement to a Statement of Common Ground
2022/23	Engagement on the Strategic Highway Assessment Report (SHAR) Virtual meeting held with National Highways 8 November 2022 Email exchanges between National Highways, SCC and Surrey Heath in Nov 2022, Dec 2022 and Jan 2023





Spring & Summer 2022	Reg 18 Draft Local Plan consultations – comments made on a number of specific highway references and to being consulted on the Transport Assessment modelling.
Dec 2021	Informal views sought on the draft Spatial Strategy.
2018	Reg 18 Consultation 2018 – noted that for Surrey Heath, HE’s interest is in the M3 and the impact of growth of traffic on that motorway.

**6h. Historic England**

<b>Date</b>	<b>Summary of key elements of co-operation to date</b>
2021	Informal consultation on heritage policies.
Spring & Summer 2022	Reg 18 Draft Local Plan consultations – support for a number of Policies including Policy DH7 Heritage Assets, with comments also on Policy HA2 London Road Block and proposed building heights and the need for an up to date and relevant historic evidence base to support housing allocations.
2018	Reg 18 Consultation 2018 - responded with general comments regarding evidencing and delivering a positive strategy for the conservation, enjoyment and enhancement of the historic environment.



**6i. Homes England**

<b>Date</b>	<b>Summary of key elements of co-operation to date</b>
Spring & Summer 2022	Reg 18 Draft Local Plan consultations.
2018	Reg 18 Consultation 2018 – no response made.

**6j. Mayor of London**

<b>Date</b>	<b>Summary of key elements of co-operation to date</b>
Spring & Summer 2022	Reg 18 Draft Local Plan consultations – no response made.
2018	Reg 18 Consultation 2018 – no response made.

**6k. Natural England**

<b>Date</b>	<b>Summary of key elements of co-operation to date</b>
May 2024	Updated Statement of Common Ground agreed.
Jan 2024	Following purchase of a new SANG site, meeting and site visit arranged with Natural England to progress the delivery of the SANG. Agreed to update the SCG to reflect the new SANG.
July 2023	Agreement to a Statement of Common Ground to support the Pre-Submission Local Plan.



Date	Summary of key elements of co-operation to date
2022/23	Meetings and engagement on the revised HRA including air quality matters and on additional SANG options – see table under Matter 4.
Spring & Summer 2022	Reg 18 Draft Local Plan consultations – detailed comments on a number of Policies including relating to climate change, green infrastructure, the Thames Basin Heaths Special Protection Area, biodiversity and pollution. Seek further evidence that there is sufficient SANG.
2018	Reg 18 Consultation 2018 – responded suggesting that SANG capacity is identified in all the allocation policies, seeking clarification on the Princess Royal barracks site boundary, suggesting content for the TBHSPA policy, and welcoming early discussions on an HRA which will need to be informed by a traffic flow model and air quality modelling.
Ongoing	NE has had an input into the emerging Local Plan and evidence base. It is also a key partner in the delivery of measures to protect the TBHSPA across the affected authorities. There is regular liaison through the TBH partnership as set out in Table 2.

**6l. Royal Borough of Windsor & Maidenhead**

Date	Summary of key elements of co-operation to date
July 2024	Letter from SHBC Portfolio Holder to RBWM Portfolio holder regarding help with meeting unmet Gypsy and Traveller and Travelling Showpeople needs.



Date	Summary of key elements of co-operation to date
11 June 2024	<p>Online meeting to discuss strategic cross boundary planning matters in advance of the SHB Reg19 being published. Outcomes were:</p> <ul style="list-style-type: none"> <li>• SHBC updated RBWM on their Local Development Scheme, with the planned publication of pre-submission Plan in August 2024.</li> <li>• RBWM highlighted that the authority is currently focused on producing SPDs to support recently adopted Local Plan.</li> <li>• In relation to the forthcoming publication of the Surrey Heath Local Plan Pre-submission version, it was noted that: <ul style="list-style-type: none"> <li>○ no unmet needs for housing supply in Surrey Heath, as shortfall has been agreed to be addressed via agreement with Hart DC.</li> <li>○ no request from SHBC for RBWM to support Surrey Heath in supply of employment floorspace, as residual forecast need for industrial and logistics floorspace is relatively modest and residual forecast need for office floorspace is not considered to be representative of actual market demand</li> <li>○ no request from SHBC for SANG capacity to be provided by RBWM</li> <li>○ Gypsy and Traveller needs are to be supported through limited site allocations and a more flexible policy approach in SH Local Plan</li> <li>○ Transport Assessment concluded that there are no significant adverse effects on the highways network in Windsor and Maidenhead, arising from Surrey Heath site allocations.</li> <li>○ Habitat Regulations Assessment including Appropriate Assessment, concluded no adverse impact on the Thames Basin Heaths SPA.</li> </ul> </li> </ul> <p>SHBC and RBWM agreed that at the current time there are no outstanding cross boundary issues that would affect the SHLP, with the exception of meeting needs for Gypsy and Travellers.</p> <p>A Statement of Common Ground will be drafted later in 2024, prior to SHBC’s submission of plan to Inspector.</p>



Date	Summary of key elements of co-operation to date
Oct 2023	Letter sent to RBWM regarding unmet Gypsy and Traveller Needs as set out in Matter 2 and Appendices 9 and 10.
Sept 2023	Email sent to RBWM with copies of the draft Strategic Highway Assessment Report for any comment.
Sept 2023	Attended briefings on the Strategic Highway Assessment and Gypsy and Traveller and Travelling Showpeople needs.
August 2022	Letter sent to GBC regarding meeting unmet gypsy and traveller and travelling showpeople needs in Surrey Heath as set out under Matter 2 and Appendices 7 and 8.
Spring & Summer 2022	Reg 18 Draft Local Plan consultations – general support for the spatial strategy and preservation of a gap between the two authorities. Welcome an update of the Transport Assessment, and support full employment needs being met. Support the Borough meeting its own Gypsy and Traveller and Travelling Showpeople needs.
2020/21	Written correspondence with regards to unmet needs in Surrey Heath as set out under Matter 1 and Appendices 3,4 and 5.
2018	Reg 18 Consultation 2018 – responded encouraging the SLAA methodology and assumptions be revisited to identify additional capacity. Agreement to continued joint working on Gypsy and Traveller needs. Urge protection of the Strategic Green Belt buffer between the two Boroughs. Support strategic options and approach to employment land. Would welcome further engagement on strategic transport and infrastructure issues. Note that it is not clear that sufficient SANG is yet in place and that further traffic modelling and air quality mitigation work needs to be undertaken.
2018	Statement of Common Ground with RBWM, SHBC, Runnymede and SCC
Ongoing	The Council works with RBWM as part of the TBH partnership.



**6m. Runnymede Borough Council**

Date	Summary of key elements of co-operation to date
July 2024	Letter from SHBC Portfolio Holder to BFB Portfolio holder regarding help with meeting unmet Gypsy and Traveller and Travelling Showpeople needs.
10 June 2024	<p>Virtual meeting to discuss strategic cross boundary planning matters. Agreed outcomes were:</p> <ul style="list-style-type: none"> <li>• SHBC updated RBC on their Local Development Scheme and SHBC noted that RBC intend to prepare a new Local Plan under the new '30 month' plan-making arrangements.</li> <li>• In relation to the forthcoming publication of the Surrey Heath Local Plan Pre-submission version, it was noted that: <ul style="list-style-type: none"> <li>○ no unmet needs for housing supply in Surrey Heath, as the shortfall has been agreed to be addressed via an agreement with Hart DC.</li> <li>○ no request from SHBC for RBC to support Surrey Heath in supply of employment floorspace, as residual forecast need for industrial and logistics floorspace is relatively modest and residual forecast need for office floorspace is not considered to be representative of actual market demand</li> <li>○ no request from SHBC for SANG capacity to be provided by RBC</li> <li>○ whilst it is recognised that there are unmet needs, the flexible Policy approach explained in the Gypsy and Traveller and Travelling Showpeople briefing is welcomed</li> <li>○ the Transport Assessment concluded that there are no significant adverse effects on the highways network in Runnymede, arising from Surrey Heath site allocations.</li> <li>○ the Habitat Regulations Assessment including Appropriate Assessment, concluded no adverse impact on the Thames Basin Heaths SPA.</li> </ul> </li> <li>• SHBC and RBC agreed that at the current time there are no outstanding cross boundary issues that would affect the SHLP, with the exception of meeting needs for Gypsy and Travellers.</li> </ul>



Date	Summary of key elements of co-operation to date
	<ul style="list-style-type: none"> <li data-bbox="421 252 1890 325">• A Statement of Common Ground will be drafted later in 2024, prior to SHBC's submission of the plan to the Inspector for RBC to review.</li> </ul>
Oct 2023	Letter sent to RBWM regarding unmet Gypsy and Traveller Needs as set out in Matter 2 and Appendices 9 and 10.
Sept 2023	Email sent to RBWM with copies of the draft Strategic Highway Assessment Report for any comment.
Sept 2023	Attended briefings on the Strategic Highway Assessment and Gypsy and Traveller and Travelling Showpeople needs.
August 2022	Letter sent to GBC regarding meeting unmet gypsy and traveller and travelling showpeople needs in Surrey Heath as set out under Matter 2 and Appendices 7 and 8.
Spring and Summer 2022	Reg 18 Draft Local Plan consultations – support the approach to housing and employment and to climate change. Comments made regarding the Green Belt boundary at Longcross, and comments recognising the work the Borough Council is undertaking in seeking to meet gypsy and traveller and travelling showpeople needs, and the proposed capacity likely from the consultation sites.
July 2021	Duty to Cooperate meeting held. Outcomes were: <ul style="list-style-type: none"> <li data-bbox="421 906 1384 938">- Clarification on SHBC Local Plan progress and RBC Local Plan review.</li> <li data-bbox="421 954 1890 1027">- Surrey Heath officers explained that they have a current shortfall in meeting housing needs having explored reasonable options outside the Green Belt, and that they are considering options for addressing unmet need.</li> <li data-bbox="421 1043 1912 1161">- Key issues highlighted in relation to potential impacts of the option of development as part of Duty to Cooperate officer level discussions. RBC highlighted the issue of additional traffic on the A320 and the need to engage Highways England at an early stage.</li> </ul>



Date	Summary of key elements of co-operation to date
	<ul style="list-style-type: none"> <li>- Challenges relating to SANG capacity and provision of Gypsy and Traveller pitches to meet local need in both boroughs were identified.</li> <li>- Discussion on matters of Housing, Gypsy and Traveller needs and SANG provision established that Runnymede are not currently able to meet any unmet needs from Surrey Heath.</li> <li>- Broad discussion on other strategic matters including transport and climate change.</li> </ul>
2020/2021	Written correspondence with regards to unmet needs in Surrey Heath as set out under Matter 1 and Appendices 3,4 and 5.
2018	Reg 18 Consultation 2018 – no response made.
2018	Statement of Common Ground with RBWM, SHBC, Runnymede and SCC
Ongoing	The Council works with Runnymede as part of the TBH partnership.

#### 6n. Rushmoor Borough Council

Date	Summary of key elements of co-operation to date
July 2024	Letter from SHBC Portfolio Holder to RBC Portfolio holder regarding help with meeting unmet Gypsy and Traveller and Travelling Showpeople needs.
June 2024	Statement of Common Ground agreed.





Date	Summary of key elements of co-operation to date
Dec 2023	Duty to Cooperate meeting with Hart; See Outcomes under Table 6f Hart District Council.
Oct 2023	Letter sent to RBC regarding unmet Gypsy and Traveller Needs as set out in Matter 2 and Appendices 9 and 10.
Sept 2023	Email sent to RBC with copies of the draft Strategic Highway Assessment Report for any comment.
Sept 2023	Attended briefings on the Strategic Highway Assessment and Gypsy and Traveller and Travelling Showpeople needs.
August 2022	Letter sent to RBC regarding meeting unmet gypsy and traveller and travelling showpeople needs in Surrey Heath as set out under Matter 2 and Appendices 7 and 8.
July 2022	Joint meeting with Hart and Rushmoor regarding SANG capacity – see outcomes under Matter 1.
Spring and Summer 2022	Reg 18 Draft Local Plan consultations – confirmed no other comments bearing in mind the agreed Statement of Common Ground.
March 2022	Statement of Common Ground agreed to support the Reg18 SHBLP
Oct 2021	Letter regarding unmet housing needs, traveller needs and SANG – see Appendices 6 and 7.
July 2021	D2C Officers meeting see Matter 1 for outcomes.



<b>Date</b>	<b>Summary of key elements of co-operation to date</b>
Dec 2020	Letter sent regarding unmet housing needs see Appendix 3.
Nov 2018	Statement of Common Ground agreed between Hart, Rushmoor and Surrey Heath to support the Hart Local Plan.
2018	Reg 18 Consultation 2018 – responded encouraging Surrey Heath to try and meet housing needs, and if not welcome continued joint working to discuss how unmet needs can be met. Suggest some changes to Objective A re housing to be delivered and request a clear distinction between housing need and the housing requirement. Rushmoor raises concerns about the SLAA methodology and encourages opportunities for increasing capacity.
Ongoing	The Council works with RBC as part of the TBH partnership as set out in Matter 4.

#### 60. Surrey County Council

<b>Date</b>	<b>Summary of key elements of co-operation to date</b>
July 2024	Statement of Common Ground agreed.
May/June 2024	Letter seeking views on the draft IDP. SCC response May 2024, and joint officer meeting regarding highway schemes June 2024.
2024	Online meetings and emails to finalise the SHAR including engagement with National Highways.
Oct 2023	Letter sent to SCC regarding unmet Gypsy and Traveller Needs as set out in Matter 2 and Appendices 9 and 10.
Sept 2023	SCC attended the Gypsy and Traveller and Travelling Showpeople briefing.



Date	Summary of key elements of co-operation to date
Sept 2023	SCC presented the Strategic Highway Assessment Report for Surrey Heath at a briefing for other local authorities – and responded to follow up queries.
July 2023	Meeting held with the SCC Borough & District Housing Partnerships Manager, Senior Commissioning Manager and Contract and Commissioning Analyst regarding input into the 2023 Housing Needs Assessments with regards to specialist accommodation and children’s services. Further written comments on the HNA received from SCC Commissioning Manager, Corporate Parenting.
2022/23	SCC preparation of the Strategic Highways Assessment Report including online meetings and emails.
2022 - 2024 & ongoing	Joint infrastructure meetings held - ongoing.
Sept/ Nov/ Dec 2022	<p>Meetings to discuss future education requirements.</p> <p>8<sup>th</sup> September 2022 agreed meeting Outcomes:</p> <ul style="list-style-type: none"> <li>• Confirmation from SCC that there are no key infrastructure issues relating to education arising from the Spatial Strategy and no need to plan for additional schools or built expansion at this time.</li> <li>• Confirmation from SCC that there are surplus places at primary level and secondary, although the latter is tighter. There may be additional pressure over the plan period if there are significant increases in the birth rate. Some Primary schools looking to reduce capacity from 2024.</li> <li>• Acknowledgement that there is a need for additional SEND places and that SCC is considering how additional places might be provided.</li> <li>• Agreement to further joint working on the IDP and on SEND places.</li> </ul>



Date	Summary of key elements of co-operation to date
	November/December meetings – no meeting notes but subsequent correspondence from Senior Commissioning Officer – early Years providing wording for the IDP (Justine Louka email 12/12/2022) and from the Commissioning Manager – North West Education Place Planning (Lauren Comer email 22/22/2022) updating the SEND section of the IDP.
Spring & Summer 2022	Reg 18 Draft Local Plan consultations – comments of support for climate change policies. Comments on site allocations including HA3 partly owned by SCC. Some suggested amendments to other policies including H6 Specialist Housing, IN2 Transportation, IN6 Green Space,, E2 Biodiversity and Geodiversity, E3 Biodiversity Net Gain, and DH7 Heritage Assets. Some additional references to Waste and Minerals were sought. Comments on the Gypsy and Traveller site allocations covering potential flooding and highway matters.
Dec 2021	Invited to comment on the impact of Draft Spatial Strategy on infrastructure requirements. Response fed into Draft IDP.
2020	Provided input into the SFRA
2018	Reg 18 Consultation 2018 – responded with suggested policy wording for flood risk/SUDS, suggested reference to collaborative partnership working on infrastructure, reference to the Waste and Minerals Local Plans, to the Electric vehicle Strategy and to joint working on air quality.
2018	Statement of Common Ground with RBWM, SHBC, Runnymede and SCC
Ongoing	The Council works with SCC as part of the TBH partnership as set out in Matter 4. SCC has responded to Call for Sites as part of the SLAA process and provided advice on highways issues relating to SLAA sites.



**6p. NHS Surrey Heartlands ICB**

<b>Date</b>	<b>Summary of key elements of co-operation to date</b>
May 2024	Consulted on the Draft IDP. Response provided (July 2024) regarding updated wording and virtual meeting held (16 July) to clarify response.
August 2023	Information received regarding Surrey Heath healthcare requirements and a request for Camberley Health Centre to be included in the IDP.
Spring & Summer 2022	Reg 18 Draft Local Plan consultations – no response made.
Dec 2021	Invited to comment on the impact of Draft Spatial Strategy on infrastructure requirements - no response made.
2018	Reg 18 Consultation 2018 – no response made.

**6q. Surrey Nature Partnership**

<b>Date</b>	<b>Summary of key elements of co-operation to date</b>
Jan 2024	SHBC Planning Policy rep attended the Biodiversity Working Group of the Surrey Nature Partnership. An update on the position of the Local Plan was provided and SHBC noted the latest progress in relation to work underway by SCC to produce the Local Nature Recovery Strategy.
Spring & Summer 2022	Reg 18 Draft Local Plan consultations – no response made.



Date	Summary of key elements of co-operation to date
2018	Reg 18 Consultation 2018 – no response made.

#### 6r. Woking Borough Council

Date	Summary of key elements of co-operation to date
July 2024	Letter from SHBC Portfolio Holder to WBC Portfolio holder regarding help with meeting unmet Gypsy and Traveller and Travelling Showpeople needs.
13 May 2024	<p>Virtual meeting to discuss strategic cross boundary planning matters.</p> <p>Agreed outcomes were:</p> <ul style="list-style-type: none"> <li>• SHBC updated WBC on their Local Development Scheme and WBC updated SHBC on the current status of their Local Plan.</li> <li>• In relation to the forthcoming publication of the Surrey Heath Local Plan Pre-submission version, it was noted that: <ul style="list-style-type: none"> <li>○ Housing: No remaining unmet needs for housing, as housing needs of Surrey Heath are to be met by supply within the borough, in conjunction with additional supply from Hart District Council.</li> <li>○ Gypsy and Traveller accommodation needs are not able to be met through sufficient site allocations, but this is to be mitigated through a more flexible policy approach in SH Local Plan</li> <li>○ SANG: SHBC has acquired additional capacity within the borough at St Catherines Road, Frimley. SANG capacity in Surrey Heath is now sufficient for the plan period.</li> <li>○ SHBC’s Strategic Highways Transport Assessment concluded that there are no significant adverse effects on the highways network in Woking, arising from Surrey Heath site allocations, including in combination with Woking Local Plan development.</li> </ul> </li> </ul>



Date	Summary of key elements of co-operation to date
	<ul style="list-style-type: none"> <li>○ Employment: There is no requirement for Employment land needs to be met by contributions from Woking, or other neighbouring authorities, as there is sufficient capacity within Surrey Heath, primarily through redevelopment within existing designated employment sites contributing to the borough's needs in respect of Industrial and Logistics uses, and forecast needs for office uses are considered to be subject to a high degree of uncertainty of there being a net positive need.</li> </ul> <p>SHBC and WBC agreed that at the current time there are no outstanding cross boundary issues that would affect the SHLP, with the exception of meeting needs for Gypsy and Travellers.</p> <p>A Statement of Common Ground between SHBC and WBC will be prepared later in 2024 (after publication of pre-submission version) and prior to submission of the Plan to the Inspector .</p>
Oct 2023	Letter sent to RBC regarding unmet Gypsy and Traveller Needs as set out in Matter 2 and Appendices 9 and 10.
Sept 2023	Email sent to RBC with copies of the draft Strategic Highway Assessment Report for any comment.
Sept 2023	Attended briefings on the Strategic Highway Assessment and Gypsy and Traveller and Travelling Showpeople needs.
August 2022	Letter sent to WBC regarding meeting unmet gypsy and traveller and travelling showpeople needs in Surrey Heath as set out under Matter 2 and Appendices 7 and 8.
Spring & Sumer 2022	Reg 18 Draft Local Plan consultations – comments on the Gypsy and Traveller Additional site allocations – and confirms would be unable to meet any unmet needs arising from Surrey Heath.



Date	Summary of key elements of co-operation to date
July 2021	<p>D2C meeting held in 2021 regarding strategic cross boundary matters. The agreed outcomes were:</p> <ul style="list-style-type: none"> <li>- Clarification on SHBC Local Plan progress and WBC position on two adopted DPDs (Core Strategy 2012 and DM Policies 2016) and emerging Site Allocations DPD.</li> <li>- Surrey Heath officers explained that they have a current shortfall in meeting housing needs having explored reasonable options outside the Green Belt, and that they are considering options for addressing the unmet need.</li> <li>- WBC outlined challenges meeting housing needs and that unmet needs were met elsewhere in their HMA.</li> <li>- Key issues highlighted in relation to potential impacts of the option of development at Fair Oaks on Woking as part of duty to cooperate officer level discussions.</li> <li>- Surrey Heath officers also outlined the backlog of need for Gypsy and Traveller pitches and challenges in finding new sites.</li> <li>- Challenges relating to SANG capacity in both boroughs were identified.</li> <li>- Broad discussion on other Strategic Matters including transport, education provision, climate change and identifying where further discussion may be needed.</li> </ul>
2020/21	Written correspondence with regards to unmet needs in Surrey Heath as set out under Matter 1 and Appendices 3,4 and 5.
2018	Reg 18 Consultation 2018 – responded referencing the need for joint working to identify funding to implement measures of mitigation along the A320 corridor. All efforts should be made to ensure that housing needs are met across the HMA. Suggests that the exclusion of Fair Oaks Airport as an allocation would be stronger if it is tested as an alternative option.
Ongoing	The Council works with WBC as part of the TBH partnership as set out in Matter 4.





**6s. Other**

<b>Date</b>	<b>Summary of key elements of co-operation to date</b>
Nov 2023	Responded to a letter from Wokingham Borough regarding unmet industrial and warehousing needs, potential unmet Gypsy and Traveller needs and other evidence base matters.
Oct 2023	Letter sent to Hampshire County Council, Epsom & Ewell, Elmbridge, Mole Valley, Reigate & Banstead, Spelthorne, Tandridge and Waverley Councils regarding unmet Gypsy and Traveller Needs as set out in Matter 2 and Appendices 9 and 10.
Sept 2023	Enterprise M3, Civil Aviation Authority, Homes England, Mayor for London, Transport for London and Office of Rail and Road invited to the Strategic Highway Assessment Report Briefing.
Sept 2023	Hampshire County Council, Elmbridge, Mole Valley, Spelthorne and Tandridge invited to the Gypsy and Traveller and Travelling Showpeople Briefing.
Nov 2022	Responded to a request from Epsom & Ewell regarding meeting any unmet housing or Gypsy and Traveller Needs. SHBC responded saying that it would not be able to meet any unmet needs arising in Epsom & Ewell.
August 2022	All Surrey Authorities written to regarding Gypsy and Traveller needs as set out in Appendices 7 and 8.
Spring & Summer 2022	All duty to cooperate bodies consulted on the Draft Local Plan Reg 18. No comments from Spelthorne Borough Council, Tandridge District Council, Mole Valley District Council, Wokingham Borough Council, Hampshire County Council or Basingstoke and Deane Borough Council.  Comments from Waverley Borough supporting the approach to meeting housing needs and noting further work to be undertaken on gypsies and travellers and travelling showpeople. Confirm unable to meet unmet needs in Waverley.



Date	Summary of key elements of co-operation to date
	Reigate and Banstead Borough Council commented on the Additional Gypsy and Traveller site allocations – no significant comments to make but suggest no cross boundary issues and limited purpose to work together as each has own GTAA methodology and evidence.
Oct 2021	All Surrey Authorities written to regarding unmet housing needs and SANG – Appendix 3.
Oct 2021 (and Feb 2020)	Responded to a request from Elmbridge regarding meeting any of their unmet housing needs. SHBC responded saying that it would not be able to meet any unmet needs arising in Elmbridge.
March 2021	Responded to a request from Mole Valley regarding meeting any of their unmet housing needs. SHBC responded saying that it would not be able to meet any unmet needs arising in Mole Valley.
Dec 2020	All Surrey Authorities written to regarding unmet housing needs, Gypsies and Travellers and SANG – Appendix 3.
Ongoing	The Council works with Elmbridge, Mole Valley, Waverly, Wokingham and Hampshire County Councils as part of the TBH partnership.





## Appendix I : Local Plan Status in Neighbouring Local Authorities (as of May 2024)

Local Authority	Plan making stage
Bracknell Forest Borough	A new Bracknell Forest Local Plan (up to 2037) has been adopted in March 2024. The Council is currently preparing SPDs/guidance to support the Local Plan, including a town centre masterplan and Housing SPD.
Guildford Borough	Guildford Borough Local Plan Strategy and Sites 2015 -2034 was adopted in 2019 and Guildford Borough Local Plan: Development Management Policies was adopted in 2023. The Council is currently updating the evidence base for the Local Plan, with a view to a plan review under the new plan making arrangements.
Hart District	Hart Local Plan Strategy and Sites 2014 – 2032 was adopted March 2020. No formal decision has been taken as to the timing of any new Local Plan but this is likely to be under the new plan making system.
Royal Borough of Windsor and Maidenhead	The Borough Local Plan 2013 – 2033 was adopted in February 2022. The Council is currently focused on progressing a suite of SPDs to support the adopted Local Plan. Intention to review Plan under new plan making system. Work has been undertaken on a Traveller Local Plan, with Issues and Options consultation undertaken in 2019.
Runnymede Borough	Runnymede 2030 Local Plan was adopted 16 July 2020. Review of the Runnymede Local Plan paused in September 2022 pending changes to national planning policy and to the plan making system. The Council intends to prepare a new local plan under the new Plan making arrangements.
Rushmoor Borough	Rushmoor Local Plan, 2014 – 2032 was adopted on 21 February 2019. A Local Development Scheme published in March 2024 identifies the preparation of a new Local Plan to start Autumn/Winter 2024.



Local Authority	Plan making stage
Woking Borough	Woking Local Development Documents, referred to as “Woking 2027” guide planning and development within the Borough until 2027. This comprises Woking Core Strategy (adopted 2012), Development Management Policies DPD (adopted in 2016) and Site Allocations DPD (adopted in 2021). The Council intends to prepare a new local plan under the new Plan making arrangements.



## Appendix 2: Matrix of Strategic Matters and Duty to Cooperate Partners

### Surrey Authorities

Organisation	Matter 1: Meeting Housing Needs	Matter 2: Gypsies & Travellers	Matter 3: Economic Growth & Retail	Matter 4: TBHSPA	Matter 5: Natural & Historic Environment and Green Belt	Matter 6: Flooding	Matter 7: Transport	Matter 8: Social Infrastructure (Healthcare & Education)	Matter 9: Utilities	Matter 10: Climate Change
<b>Surrey County Council</b>	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓
<b>Epsom &amp; Ewell Borough Council</b>	Yes ✓				Yes ✓					Yes ✓
<b>Elmbridge Borough Council</b>	Yes ✓		Yes ✓	Yes ✓	Yes ✓					Yes ✓
<b>Guildford Borough Council</b>	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓
<b>Mole Valley Council</b>	Yes ✓				Yes ✓					Yes ✓
<b>Reigate &amp; Banstead Council</b>	Yes ✓				Yes ✓					Yes ✓



<b>Organisation</b>	<b>Matter 1: Meeting Housing Needs</b>	<b>Matter 2: Gypsies &amp; Travellers</b>	<b>Matter 3: Economic Growth &amp; Retail</b>	<b>Matter 4: TBHSPA</b>	<b>Matter 5: Natural &amp; Historic Environment and Green Belt</b>	<b>Matter 6: Flooding</b>	<b>Matter 7: Transport</b>	<b>Matter 8: Social Infrastructure (Healthcare &amp; Education)</b>	<b>Matter 9: Utilities</b>	<b>Matter 10: Climate Change</b>
<b>Runnymede Borough Council</b>	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓		Yes ✓	Yes ✓	Yes ✓	Yes ✓
<b>Spelthorne Council</b>	Yes ✓		Yes ✓		Yes ✓			Yes ✓		Yes ✓
<b>Tandridge District Council</b>	Yes ✓		Yes ✓		Yes ✓					Yes ✓
<b>Waverley Borough Council</b>	Yes ✓		Yes ✓	Yes ✓	Yes ✓			Yes ✓		Yes ✓
<b>Woking Borough Council</b>	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓



## Berkshire Unitaries

<b>Organisation</b>	<b>Matter 1: Meeting Housing Needs</b>	<b>Matter 2: Gypsies &amp; Travellers</b>	<b>Matter 3: Economic Growth &amp; Retail</b>	<b>Matter 4: TBHSPA</b>	<b>Matter 5: Natural &amp; Historic Environment and Green Belt</b>	<b>Matter 6: Flooding</b>	<b>Matter 7: Transport</b>	<b>Matter 8: Social Infrastructure (Healthcare &amp; Education)</b>	<b>Matter 9: Utilities</b>	<b>Matter 10: Climate Change</b>
<b>Bracknell Forest Borough</b>	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓
<b>Royal Borough of Windsor &amp; Maidenhead</b>	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓		Yes ✓	Yes ✓		Yes ✓
<b>Wokingham Borough</b>	Yes ✓		Yes ✓	Yes ✓	Yes ✓	Yes ✓				Yes ✓





## Hampshire Authorities

Organisation	Matter 1: Meeting Housing Needs	Matter 2: Gypsies & Travellers	Matter 3: Economic Growth & Retail	Matter 4: TBHSPA	Matter 5: Natural & Historic Environment and Green Belt	Matter 6: Flooding	Matter 7: Transport	Matter 8: Social Infrastructure (Healthcare & Education)	Matter 9: Utilities	Matter 10: Climate Change
<b>Hampshire County Council</b>	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓		Yes ✓	Yes ✓
<b>Basingstoke &amp; Dean</b>			Yes ✓							
<b>Hart District</b>	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓
<b>Rushmoor Borough</b>	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓	Yes ✓



## Prescribed Bodies

Organisation	Matter 1: Meeting Housing Needs	Matter 2: Gypsies & Travellers	Matter 3: Economic Growth & Retail	Matter 4: TBHSPA	Matter 5: Natural & Historic Environment and Green Belt	Matter 6: Flooding	Matter 7: Transport	Matter 8: Social Infrastructure (Healthcare & Education)	Matter 9: Utilities	Matter 10: Climate Change
<b>Civil Aviation Authority</b>			Yes ✓				Yes ✓			
<b>Frimley Integrated Care Board</b>								Yes ✓		
<b>Surrey Heartlands Integrated Care Board</b>								Yes ✓		
<b>Enterprise M3 Local Enterprise Partnership</b>	Yes ✓		Yes ✓	Yes ✓			Yes ✓			Yes ✓
<b>Environment Agency</b>	Yes ✓				Yes ✓	Yes ✓			Yes ✓	Yes ✓
<b>Historic England</b>	Yes ✓		Yes ✓		Yes ✓					
<b>Homes England</b>	Yes ✓						Yes ✓			
<b>Mayor of London</b>	Yes ✓		Yes ✓				Yes ✓			



<b>Organisation</b>	<b>Matter 1: Meeting Housing Needs</b>	<b>Matter 2: Gypsies &amp; Travellers</b>	<b>Matter 3: Economic Growth &amp; Retail</b>	<b>Matter 4: TBHSPA</b>	<b>Matter 5: Natural &amp; Historic Environment and Green Belt</b>	<b>Matter 6: Flooding</b>	<b>Matter 7: Transport</b>	<b>Matter 8: Social Infrastructure (Healthcare &amp; Education)</b>	<b>Matter 9: Utilities</b>	<b>Matter 10: Climate Change</b>
<b>National Health Service Commissioning Board</b>								Yes ✓		
<b>National Highways</b>							Yes ✓			
<b>Natural England</b>				Yes ✓	Yes ✓	Yes ✓				Yes ✓
<b>Office of Rail and Road</b>							Yes ✓			Yes ✓
<b>Surrey Nature Partnership</b>				Yes ✓	Yes ✓	Yes ✓				Yes ✓
<b>Transport for London</b>							Yes ✓			



## Appendix 3: Duty to Cooperate letter sent December 2020



**Surrey Heath Borough Council**  
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**Service:** Regulatory Services  
**Division:** Planning Policy  
**Tel:** 01276 707100  
**Email:** Jane.reeves@surreyheath.gov.uk  
/katie.bailey@surreyheath.gov.uk



By email

21<sup>st</sup> December 2020

Dear [redacted],

### **Surrey Heath Borough Local Plan: Duty to Co-operate Matters**

I am writing further to our recent consultation on a Draft Duty to Co-operate Scoping Report to set out some further information on the preparation of the Surrey Heath Local Plan and Duty to Co-operate Matters.

Notwithstanding potential planning reforms the Council is progressing with the Local Plan and a revised Local Development Scheme is to be considered by Executive early next year. This includes consultation on a second Regulation 18 Draft Local Plan later in 2021.

In developing the new Local Plan, you will be aware that Surrey Heath faces a number of challenges in seeking to meet housing needs. Over 44% of land within the Borough comprises metropolitan Green Belt and 42% of the Borough is affected by the Thames Basin Heaths Special Protection Area and its associated 400m buffer zone. In total, over 80% of the Borough is affected by designations that limit the availability of land for development.

Against this backdrop, the Council is undertaking extensive work to try to identify opportunities to meet its own housing need. Under the current standard methodology this is 332 dwellings per annum but increases to 408 dpa under the proposed standard methodology. Clearly there is no certainty as yet as to the final outcome of any new standard methodology and/or potential binding housing number arising from the White Paper proposals. However, the principal constraints in the Borough remain and meeting housing needs will be challenging. Previous work in meeting 332 dpa showed a shortfall of just over 700 dwellings which was recognised by the Inspector at the Hart Local Plan examination and reflected in the wording of their adopted Plan. Furthermore, the NPPF now requires a longer plan period and the standard methodology figure increases annual need such that the total housing need over the plan period has significantly increased.



With this in mind the Council is currently undertaking a further robust call for sites including targeted correspondence with landowners in the countryside and in the town centre, as well as revisiting other opportunities for increased capacity. This will support a revised SLAA as well as a Countryside Capacity Study. Surrey Heath remains strongly committed to seeking to meet as much of its identified housing need as possible. However, even with the measures above, we may need to explore other options, including the potential for unmet need to be met outside of the Borough boundaries.

In addition, you may be aware that Surrey Heath has found it difficult to find sufficient SANG to mitigate housing in the Borough and has been helped by the opportunities to share SANG with other local authorities. Further opportunities for SANG capacity outside of the Borough boundary are likely to be needed and we would welcome further exploration of this as appropriate with your authority in the future.

Once the Council has a clearer idea of housing numbers and capacity and has a clearer idea as to the emerging spatial strategy we will be in touch regarding further duty to co-operate matters including those identified as shared Matters in the Duty to Co-operate Scoping Report.

Please use Katie Bailey as your first point of contact for duty to co-operate matters (email at the top of this letter).

I look forward to further discussions and will be in touch again in the New Year.

Yours sincerely,

*Jane Reeves*

Planning Policy Manager  
Planning Policy and Conservation,  
Surrey Heath Borough Council



## Appendix 4: Duty to Cooperate Letters sent October 2021



**Surrey Heath Borough Council**  
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[Jane.Reeves@surreyheath.gov.uk](mailto:Jane.Reeves@surreyheath.gov.uk)



[Planning Policy Manager]  
[Council]  
By email

1 October 2021

Dear Sir/Madam,

### **Duty to Co-operate: Meeting housing and Gypsy and Traveller needs**

As you may be aware, Surrey Heath is in the process of preparing a new Local Plan and is due to consult on a Regulation 18 draft Plan in the New Year. You may recall that we wrote to you in December 2020 advising of the constraints in the Borough which make it challenging to meet local housing needs. In that letter we advised that we would be in touch again once further capacity work had been undertaken. In addition to general housing needs, further evidence has been completed on the need for Gypsy and Traveller pitches and those constraints also affect our ability to find suitable sites for additional pitches.

#### General housing needs

As set out previously, over 44% of land within the Borough comprises metropolitan Green Belt and 42% of the Borough is affected by the Thames Basin Heaths Special Protection Area (TBHSPA) and its associated 400m buffer zone. In total, over 80% of the Borough is affected by designations that limit the availability of land for development. Against this backdrop, the Council has undertaken extensive work to try to identify sites for new homes (as well as other needs including Gypsy and Traveller pitches). Officers have recently undertaken a new Call for Sites including targeted correspondence with landowners in the countryside and in Camberley town centre to seek to maximise appropriate opportunities in those locations as well as elsewhere in the Borough, and have undertaken a Countryside Capacity Study.

The standard methodology housing requirement of 327 dpa is significantly higher than that set out in the current Core Strategy of 191 dpa. The work that the Council has undertaken to date still shows a significant shortfall over the Plan period 2019 - 2038. Against an overall housing need of 6,231 homes (just over 6,800 including a buffer) we have currently identified capacity for approximately 5,700 homes in the urban area and from available and suitable countryside sites. This leaves a shortfall of around 1,100 new homes.

Previous work in meeting the housing requirement at the time of the last Draft Local Plan consultation in 2018 showed a shortfall of just over 700 dwellings. This was subsequently



recognised by the Inspector at the Hart Local Plan examination, with that unmet need (41dpa) being reflected in the wording of their adopted Local Plan 2014 – 2032 (adopted April 2020). Discussions are ongoing with Hart District Council with regards to the level of that housing provision that could be attributed to Surrey Heath in overlapping Plan periods, i.e. 2019 – 2032.

Gypsy and Traveller needs

The Gypsy and Traveller Accommodation Assessment, 2020 identifies a need for 32 pitches up to 2040. A site methodology for identifying potential sites has been developed and a number of options have been explored including the expansion of existing sites, a review of Council owned land and the identification of new sites through the Call for Sites process above. However, the constraints set out earlier in this letter mean that there are limited opportunities for new sites and the need is unlikely to be met from urban or countryside sites.

Meeting unmet needs

Surrey Heath Borough Council remains strongly committed to seeking to meet as much of its identified needs as possible, however at this stage it appears unlikely that all housing or gypsy and traveller needs can be met from urban and countryside sites, even allowing for some unmet general housing needs to be delivered in Hart.

Paragraph 141 of the National Planning Policy Framework (NPPF) sets out that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. In addition to making as much use of brownfield and underutilised land as possible and optimising densities, this includes having discussions with neighbouring authorities as to whether they can accommodate any unmet need.

The Council is undertaking a Green Belt Review, however, in order to comply with the provisions of the NPPF and to inform the plan making process as it goes forward we are now writing to you under the duty to co-operate to ask whether your council would be able to assist Surrey Heath Borough in accommodating any unmet housing need or in meeting Gypsy and Traveller needs.

In addition to the above, you may be aware that Surrey Heath has found it difficult to find sufficient Suitable Alternative Natural Greenspace (SANG) in the Borough. SANG is required for all net new dwellings to mitigate the impact of housing on the TBHSPA and capacity has been helped by the opportunities to share SANG with other local authorities. We would also welcome information on any future availability of SANG capacity that might support development in Surrey Heath Borough.

I look forward to receiving your response on this matter in due course and it would be helpful if we could receive this by 15 October 2021. I would be grateful if responses could be sent by email to [policy.consult@surreyheath.gov.uk](mailto:policy.consult@surreyheath.gov.uk)

Should you have any queries regarding the above, or would like further discussion, please do not hesitate to contact me using the details provided or Katie Bailey at [katie.bailey@surreyheath.gov.uk](mailto:katie.bailey@surreyheath.gov.uk)

Yours sincerely,

*Jane Reeves*

Planning Policy Manager  
Planning Policy and Conservation,  
Surrey Heath Borough Council



## Appendix 5: Outcome of Duty to Cooperate consultation letters (October 2021)

Responses to letter sent on 1<sup>st</sup> October 2021 to neighbouring and Surrey authorities (excluding Hart and Rushmoor)

Authority	Response: Housing need	Response: Gypsy and Traveller needs	Any other comments
<b>Bracknell Forest Borough</b>	BFC are not in a position to be able to help SHBC with unmet general housing needs.	BFC are unable to assist with meeting SHBC Gypsy and Traveller pitch needs.	Further discussions on creating a super SANG and unlocking further SANG capacity are scheduled to take place with officers from both LPAs shortly.
<b>Elmbridge Borough</b>	Emerging evidence base shows there is a realistic possibility that Elmbridge will not be able to meet their local housing need within existing urban areas.	No comments on this matter.	EMB is seeking to identify additional SANG capacity. Various options are being considered however, the catchment areas of these options will not extend into Surrey Heath Borough.
<b>Epsom &amp; Ewell Borough</b>	No response received.	No response received.	No response received.





Authority	Response: Housing need	Response: Gypsy and Traveller needs	Any other comments
<b>Guildford Borough</b>	No surplus supply and cannot therefore contribute towards meeting unmet needs from elsewhere	It is not considered that the level of sites identified is much greater than needed and there is therefore no surplus that could be considered to meet any unmet needs arising from elsewhere.	GBC allocated a number of Green Belt sites, including traveller sites. The approach to Green Belt release has also been tested through the High Court which has confirmed that housing need can and should form part of the exceptional circumstances test. For these reasons they consider that a thorough and robust approach will be necessary in demonstrating that Surrey Heath's housing needs cannot be met in full.
<b>Mole Valley District</b>	Mole Valley District Council cannot meet its own general housing needs and is therefore unable to assist.	There is no known supply of deliverable sites in Mole Valley to accommodate cross-boundary needs.	Mole Valley's GTAA does not identify any significant cross-boundary movement indicating a strategic requirement to accommodate households from beyond the Mole Valley's administrative boundaries.
<b>Reigate &amp; Banstead Borough</b>	Reigate and Banstead and Surrey Heath are in different housing market areas. Consequently, it	No comments on this matter	No comments



<b>Authority</b>	<b>Response: Housing need</b>	<b>Response: Gypsy and Traveller needs</b>	<b>Any other comments</b>
	would serve limited purpose for our authorities to work together on this issue.		
<b>Royal Borough of Windsor &amp; Maidenhead</b>	No response received.	No response received.	No response received.
<b>Runnymede Borough Council</b>	At the current time it is not possible for the Council to commit to meeting unmet needs from another Local Authority area.	At the current time it is not possible for the Council to commit to meeting unmet needs from another Local Authority area.	Suggested that unmet needs should be met within the HMA.  Runnymede's SANGs are too far away from the western part of Surrey Heath where SANG is most needed, as such RBC would not be able to assist in this regard.
<b>Spelthorne Borough</b>	No response received.	No response received.	No response received.
<b>Tandridge District</b>	No response received.	No response received.	No response received.



Authority	Response: Housing need	Response: Gypsy and Traveller needs	Any other comments
<b>Waverley Borough</b>	Waverley is not in a position to assist in meeting the unmet housing need from the borough of Surrey Heath.	The Council is unable to assist in meeting any of the unmet need for gypsy and traveller sites from the borough of Surrey Heath.	Waverley is currently not in a position to provide any information about the availability of SANG in the future to support housing development in Surrey Heath.
<b>Woking Borough</b>	Woking Borough Council is unable to meet any unmet need arising from Surrey Heath Borough.	Woking Borough Council is unable to meet any unmet need arising from Surrey Heath Borough.	
<b>Wokingham Borough</b>	WBC does not have capacity to assist SHBC, or any other local planning authority, with regards to unmet needs.	Given the significant need for Gypsy and Traveller pitches in Wokingham Borough and the lack of identified suitable land supply, it is not appropriate or possible for WBC to assist in	WBC consider that housing needs can only be met within the functional geography of the originating local authority.



<b>Authority</b>	<b>Response: Housing need</b>	<b>Response: Gypsy and Traveller needs</b>	<b>Any other comments</b>
		meeting any unmet need from SHBC or elsewhere.	



## Appendix 6: Letters to Hart and Rushmoor October 2021 (responses set out in Table 4 of main report)



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Daniel Hawes  
Planning Policy Manager  
Hart District Council  
By email

19 October 2021

Dear Daniel,

### **Surrey Heath Unmet Housing Needs**

I am writing further to the Duty to Co-operate meeting held between Hart and Surrey Heath officers on 15th June of this year. At that meeting, Surrey Heath set out that the Strategic Land Availability Assessment (SLAA) was being finalised and it was agreed that a draft of the SLAA and of the Countryside Capacity Study would be sent to Hart prior to publication. These documents provide some of the supporting evidence for assessing the ability to meet local housing needs in Surrey Heath.

At the above mentioned Duty to Co-operate meeting, it was accepted by Hart that Surrey Heath is significantly constrained and faces a number of challenges in meeting housing needs. This has also been accepted through previous Housing Market Area discussions and Statements of Common Ground between Hart and Surrey Heath (and where appropriate, Rushmoor).

As you may be aware, over 44% of land within the Borough comprises metropolitan Green Belt and 42% of the Borough is affected by the Thames Basin Heaths Special Protection Area (TBHSPA) and its associated 400m buffer zone. In total, over 80% of the Borough is affected by designations that limit the availability of land for development. However, Surrey Heath borough council is committed to meeting as much of its housing needs as possible. As such, officers have prepared a rigorous and robust strategic land availability assessment in order to maximise the identified capacity from potential development sites within the Borough.

This work included a further Call for Sites exercise, which included a targeted mailing to landowners of potential countryside sites that had been identified through a Countryside Capacity Study, and also to landowners within Camberley town centre. A more recent mailing was also undertaken to owners of sites who had not resubmitted their sites from the previous SLAA. Draft SLAA Appendix 1 – Methodology sets out further elements of this work in detail. Potential capacity now comes from a range of sites within settlements (including employment sites), from countryside sites and from small previously developed sites within the Green Belt.



Windfall allowances have been included for small sites (1 – 4 units), for prior notifications and for rural exception sites.

A copy of the Draft SLAA and of the Countryside Capacity Study will be sent following this letter.

Surrey Heath's Local Housing Need of 327 dwellings per annum (dpa), as calculated using the standard methodology, is significantly higher than that set out in the current Core Strategy of 191 dpa. The work that the Council has undertaken so far, suggests a significant shortfall of housing supply over the Plan period 2019 - 2038. Against an overall housing need of 6,231 homes, we have currently identified capacity for just under 5,700 homes. This leaves a shortfall of approximately 520 new homes over the Plan period. However, this figure does not include any buffer to allow for non-delivery and under-delivery of sites. With a buffer of 5% for example, there would be a shortfall of about 830 new homes.

Previous work in meeting the housing requirement at the time of the last Draft Local Plan consultation in 2018 showed a shortfall of just over 700 dwellings. This was subsequently recognised by the Inspector at the Hart Local Plan examination, with that unmet need (41dpa) being reflected in the wording of the adopted Local Plan 2014 – 2032 (adopted April 2020).

Paragraph 141 of the National Planning Policy Framework (NPPF) sets out that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. In addition to making as much use of brownfield and underutilised land as possible and optimising densities, this includes having discussions with neighbouring authorities as to whether they can accommodate any unmet need. The Council has written to all neighbouring and Surrey authorities regarding this and has held a recent meeting with Rushmoor Borough Council as the remaining Housing Market Area partner.

The Council is undertaking a Green Belt Review, in order to comply with the provisions of the NPPF and to inform the plan-making process. We are now writing to you under the duty to co-operate to seek clarification as to the level of Surrey Heath's unmet housing need that could be met within Hart District over the Plan period. We are aware that Hart is considering the timing for a future Local Plan review and is at present considerably over-delivering against the Local Plan target. We are also aware that the standard methodology provides Hart with a significantly lower housing need figure and that the district is relatively unconstrained. In any response, we would be interested to understand:

- whether Hart remains able to deliver 41dpa to meet unmet needs in Surrey Heath over the overlapping Surrey Heath and Hart plan periods (2019 to 2032 – 533 dwellings);
- if this is no longer the case, the circumstances that may have changed to prevent this from being deliverable;
- the opportunity for Hart to increase the level of unmet needs that it is able to accommodate to support Surrey Heath over the plan period to 2038;
- whether there is any additional evidence that Hart would need with regard to the above.

At the duty to co-operate meeting in June, Surrey Heath officers also identified the challenges in meeting Gypsy and Traveller needs. The Gypsy and Traveller Accommodation Assessment, 2020 identifies a need for 32 pitches up to 2040. A site methodology for identifying potential sites has been developed and a number of options have been explored including the expansion of existing sites, a review of Council owned land and the identification



of new sites through the Call for Sites process above. However, the constraints set out earlier in this letter mean that there are limited opportunities for new sites and the need is unlikely to be met from urban or countryside sites. We are therefore also seeking to determine whether any unmet Gypsy and Traveller needs could be met within Hart over the Plan period.

In addition to the above, you will be aware that Surrey Heath has found it difficult to find sufficient Suitable Alternative Natural Greenspace (SANG) in the Borough. SANG is required for all net new dwellings to mitigate the impact of housing on the TBHSPA and capacity has been helped by the opportunities to share SANG with other local authorities. We would also welcome information on any future availability of SANG capacity that might support development in Surrey Heath Borough.

It would be helpful if we could have a response to this letter within a couple of weeks and would therefore suggest that a response is provided by Monday 8<sup>th</sup> November. If it would be helpful to meet to discuss relevant issues during this time then please let us know. Please note that a copy of this letter has also been sent to Rushmoor Borough Council.

In the meantime if you have any other queries regarding this letter or the evidence base, please do not hesitate to contact me using the details provided or Katie Bailey at [katie.bailey@surreyheath.gov.uk](mailto:katie.bailey@surreyheath.gov.uk).

Yours sincerely,

*Jane Reeves*

Jane Reeves  
Planning Policy & Conservation Manager  
Planning Services  
Finance and Customer Service Directorate  
Surrey Heath Borough Council





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**CC Daniel Hawes**  
**Hart District Council**

Ian Mawer  
Principal Planner  
Rushmoor Borough Council  
By email

19 October 2021

Dear Ian,

#### **Surrey Heath Unmet Housing Needs**

I am writing further to the Duty to Co-operate meeting held between Rushmoor and Surrey Heath officers on 12th July of this year. At that meeting Surrey Heath set out that the emerging housing capacity work being undertaken to inform a new Local Plan indicated that there would be a significant shortfall of housing supply against local housing need. It was agreed that once the Strategic Land Availability Assessment (SLAA) was further advanced, that Surrey Heath Borough Council would write formally to Rushmoor Borough.

At the above mentioned Duty to Co-operate meeting it was accepted by Rushmoor that Surrey Heath is significantly constrained and faces a number of challenges in meeting housing needs. This has also been accepted through previous Housing Market Area discussions and Statements of Common Ground between Rushmoor and Surrey Heath (and where appropriate, Hart). At the meeting Rushmoor Borough Council officers indicated that it was not envisaged that there would be any surplus housing supply in Rushmoor that could meet any unmet housing needs arising in Surrey Heath Borough.

As you may be aware, over 44% of land within the Borough comprises metropolitan Green Belt and 42% of the Borough is affected by the Thames Basin Heaths Special Protection Area (TBHSPA) and its associated 400m buffer zone. In total, over 80% of the Borough is affected by designations that limit the availability of land for development. However, Surrey Heath Borough Council is committed to meeting as much of its housing needs as possible. As such, officers have undergone a rigorous strategic land availability assessment in order to maximise the identified capacity from potential development sites within the Borough.

#### General Housing Needs





This capacity work included a further Call for Sites exercise which included a targeted mailing to landowners of potential countryside sites that had been identified through a Countryside Capacity Study, and also to landowners within Camberley town centre. A more recent mailing was also undertaken to owners of sites who had not resubmitted their sites from the previous SLAA. Potential capacity now comes from a range of sites within settlements (including employment sites), from countryside sites and from small previously developed sites within the Green Belt. Windfall allowances have been included for small sites (1 – 4 units), for prior notifications and for rural exception sites.

Surrey Heath's Local Housing Need of 327 dwellings per annum (dpa), as calculated using the standard methodology housing requirement is significantly higher than that set out in the current Core Strategy of 191 dpa. The work that the Council has undertaken so far demonstrates a significant shortfall of housing supply over the Plan period 2019 - 2038. Against an overall housing need of 6,231 homes we have currently identified capacity for just under 5,700 homes. This leaves a shortfall of approximately 520 new homes over the Plan period. However, this figure does not include any buffer to allow for non-delivery and under-delivery of sites. With a buffer of 5% for example, there would be a shortfall of about 830 new homes.

A copy of the Draft SLAA and Countryside Capacity Study will be sent following this letter.

Previous work in meeting the housing requirement at the time of the last Draft Local Plan consultation in 2018 showed a shortfall of just over 700 dwellings. This was subsequently recognised by the Inspector at the Hart Local Plan examination, with that unmet need (41dpa) being reflected in the wording of the adopted Local Plan 2014 – 2032 (adopted April 2020).

#### Gypsy and Traveller needs

At the duty to co-operate meeting in July, Surrey Heath officers identified the challenges in meeting Gypsy and Traveller needs. The Gypsy and Traveller Accommodation Assessment, 2020 identifies a need for 32 pitches up to 2040. A site methodology for identifying potential sites has been developed and a number of options have been explored including the expansion of existing sites, a review of Council owned land and the identification of new sites through the Call for Sites process above. However, the constraints set out earlier in this letter mean that there are limited opportunities for new sites and the need is unlikely to be met from urban or countryside sites.

#### Meeting unmet needs

As set out above, Surrey Heath Borough Council remains strongly committed to seeking to meet as much of its identified needs as possible. Based on current evidence however, it appears unlikely that all housing or gypsy and traveller needs can be met from urban and countryside sites, even allowing for some unmet general housing needs to be delivered in Hart.

Paragraph 141 of the National Planning Policy Framework (NPPF) sets out that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. In addition to making as much use of brownfield and underutilised land as possible and optimising densities,



this includes having discussions with neighbouring authorities as to whether they can accommodate any unmet need. The Council has written to all neighbouring and Surrey authorities regarding this and is having further discussions with Hart District Council as the remaining Housing Market Area (HMA) partner.

The Council is undertaking a Green Belt Review, however, in order to comply with the provisions of the NPPF and to inform the plan making process as it goes forward we are now writing to you under the duty to co-operate to ask whether your council would be able to assist Surrey Heath Borough in accommodating any unmet housing need or in meeting Gypsy and Traveller needs.

In responding, it would be helpful to understand the local circumstances and matters of current and future housing delivery that inform your response.

In addition to the above, you will be aware that Surrey Heath has found it difficult to find sufficient Suitable Alternative Natural Greenspace (SANG) in the Borough. SANG is required for all net new dwellings to mitigate the impact of housing on the TBHSPA and capacity has been helped by the opportunities to share SANG with other local authorities. We would also welcome information on any future availability of SANG capacity that might support development in Surrey Heath Borough.

It would be helpful if we could have a response to this letter within a couple of weeks and would therefore suggest that a response is provided by Monday 8<sup>th</sup> November. If it would be helpful to have further discussion during this time then please let us know. Should you have any other queries regarding the above, or would like further discussion, please do not hesitate to contact me using the details provided or Katie Bailey at [katie.bailey@surreyheath.gov.uk](mailto:katie.bailey@surreyheath.gov.uk)

Please note a copy of this letter has been sent to Hart District Council.

Yours sincerely,

*Jane Reeves*

Jane Reeves  
Planning Policy & Conservation Manager  
Planning Services  
Finance and Customer Service Directorate  
Surrey Heath Borough Council



## Appendix 7: Duty to Cooperate letters to neighbouring and Surrey Authorities sent August 2022



**Surrey Heath Borough Council**  
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/ [Jane.Reeves@surreyheath.gov.uk](mailto:Jane.Reeves@surreyheath.gov.uk)



[Planning Policy Team Leader]  
[Council]  
By email

16 August 2022

Dear [Name],

### **Duty to Co-operate: Draft Local Plan Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople (Regulation 18) Consultation**

As you may be aware, Surrey Heath is in the process of preparing a new Local Plan and recently consulted on a Regulation 18 Draft Plan between March and May 2022. At the time of the publication of the Draft Local Plan in March, the Council had been unable to identify sufficient sites to meet its identified needs for Gypsies and Travellers and included only one site allocation for a Gypsy and Traveller site for 4 pitches at Diamond Ridge Woods, Camberley. As a result, work has been ongoing to identify further sites to deliver the required pitches and plots.

Two further potential Gypsy and Traveller sites and one potential Travelling Showpeople site have been identified to help address the identified needs in the first five years of the Plan period. These sites are set out within the Draft Local Plan Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople (Regulation 18) document<sup>1</sup>, which the Council is consulting on alongside an Updated Interim Sustainability Appraisal Addendum from the 8<sup>th</sup> August to the 19<sup>th</sup> September 2022.

At this stage, sufficient site assessment work has been undertaken to support this further Regulation 18 consultation, however, these sites will require further detailed feasibility work to be undertaken in order to establish their ultimate deliverability. It is also noted that whilst the Council is continuing work to identify further deliverable or developable Gypsy and Traveller sites and Travelling Showpeople plots, land availability and environmental constraints are proving significant barriers to the identification of further opportunities to meet the needs identified. In view of this, the Council may be unable to identify sites sufficient to meet the Council's full identified needs over the plan period.

<sup>1</sup> [Draft Surrey Heath Local Plan: Preferred Options \(2019 - 2038\) Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople Regulation 18 Consultation - Surrey Heath Borough Council Planning Policy Consultations \(inconsult.uk\)](#)



In light of this, the Council needs to ensure that we have undertaken robust duty to co-operate discussions with other relevant local authorities to determine whether any potential unmet needs could be met elsewhere, should a shortfall arise.

Gypsy and Traveller needs

You may recall that we wrote to you in October 2021 advising of the constraints in the Borough which make it challenging to identify suitable sites for pitches and plots to meet the needs of Gypsies and Travellers and Travelling Showpeople. As set out previously, over 44% of land within the Borough comprises metropolitan Green Belt and 42% of the Borough is affected by the Thames Basin Heaths Special Protection Area (TBHSPA) and its associated 400m buffer zone. In total, over 80% of the Borough is affected by designations that limit the availability of land for development. Against this backdrop, the Council has undertaken extensive work to try to identify sites for Gypsy and Traveller pitches.

Surrey Heath has a significant need for Gypsy and Traveller pitches and Travelling Showpeople plots. The Council's Gypsy and Traveller Accommodation Assessment (GTAA) sets out that the Council has an identified need for 32 Gypsy and Traveller Pitches (in accordance with the planning definition) and 14 Travelling Showpeople plots across the period 2020 –2040, with the majority of that need required within the early part of the Plan period. Taking into account the two pitches already permitted (at Land south of Junction 3 of the M3, Lightwater) and the proposed allocation for 4 pitches at Diamond Ridge Woods, Camberley, it is considered that the Council, as a minimum, needs to identify a further 19 pitches and 9 Travelling Showpeople plots within the Draft Local Plan in order to meet needs in the early part of the plan period and a further 7 pitches and 5 plots if it is to meet full needs.

Meeting potential unmet needs

In order to inform the plan making process as it goes forward, we are now writing to you under the duty to co-operate to ask whether your Council would be able to assist Surrey Heath Borough in accommodating any potential unmet Gypsy and Traveller needs, should a shortfall arise, once further work is undertaken, and having regard to the current consultation responses.

I would be grateful if you could also confirm your Council's current Local Plan position regarding meeting your identified needs for Gypsies and Travellers and Travelling Showpeople.

I look forward to receiving your response on this matter in due course and it would be helpful if we could receive this by 19 September 2022. I would be grateful if responses could be sent by email to [planning.policy@surreyheath.gov.uk](mailto:planning.policy@surreyheath.gov.uk)

Should you have any queries regarding the above, or would like further discussion, please do not hesitate to contact me using the details provided or Kate Galloway at [kate.galloway@surreyheath.gov.uk](mailto:kate.galloway@surreyheath.gov.uk)

Yours sincerely,

Jane



## Appendix 8: Outcome of Duty to Cooperate consultation letters regarding Gypsy and Traveller and Travelling Showpeople needs (August 2022)

Authority	Response	Able to Assist?	Other Comments
<b>Guildford Borough Council</b>	Have allocated sufficient sites in LP to meet G&T needs, with a buffer of 4 pitches, although this cannot contribute towards meeting needs elsewhere. In order to meet this need, a significant number of GB sites were allocated.	Unable to assist.	
<b>Mole Valley District Council</b>	LP currently undergoing examination. Meeting needs for gypsy and traveller pitches but with no margin for additional provision. However, the Council cannot meet the needs for travelling showpeople but it continues to look for sites while the Plan is being examined.	Unable to assist.	
<b>Spelthorne Borough Council</b>	Currently consulting on Reg19 LP. Only just able to meet development needs due to constraints. Have released Green Belt sites to meet needs of gypsies and travellers and travelling showpeople.	Not in a position to assist.	
<b>Bracknell Forest</b>	The BFLP is at examination with Stage 2 hearings due to commence on 18 <sup>th</sup> October 2022. No	Unable to assist.	Querying size of pitches and plots.



<b>Authority</b>	<b>Response</b>	<b>Able to Assist?</b>	<b>Other Comments</b>
<b>Council</b>	local authority was able to assist Bracknell in meeting GTTS needs, so the BFLP proposes a new site on land at Jealott's Hill.		
<b>Hart District Council</b>	The intention was to address GTTS needs in DPD (as set out in Policy H5 of Local Plan) However the call for sites did not generate any suitable site options. The intention is now to plan for Traveller needs as part of the next Local Plan and it has been agreed that a review of the HLP 2032 would follow the expected Levelling Up Bill.	Not currently in a position to meet any unmet needs from other areas.	HDC welcomes the release of Green Belt land. Support contention that exceptional circumstances exist.
<b>Tandridge District Council</b>	A report is going to the Planning Policy committee meeting on the 22 <sup>nd</sup> September about the future of the emerging Local Plan for Tandridge.	TDC are not part of the Surrey Heath HMA and due to distance between our areas, any need to address housing shortfall is likely to be on a strategic level across Surrey Heath.	Highlights that the East Surrey Authorities have joint Sustainability Appraisal objectives which are applicable to our districts and boroughs – ask that SHBC is cognisant of these to ensure a wider joined up approach to SA across Surrey.
<b>Waverley Borough Council</b>	Gypsy, Traveller and Travelling Showpeople site allocations are proposed within the Waverley Borough Local Plan Part 2 which is currently	Unable to assist	



Authority	Response	Able to Assist?	Other Comments
	being examined. At the base date of 1 April 2022 the need had already been met through planning permissions granted.		
<b>Woking Borough Council</b>	At this stage, the Council is unable to identify any additional sites that have realistic prospects of coming forward to be suitable for Traveller accommodation.	Unable to assist	
<b>Wokingham Borough Council</b>	The capacity of potential allocations falls significantly short of meeting the identified need. WBC therefore has a significant challenge to accommodate the needs arising locally.	Unable to assist	<p>WBC does not consider it to be appropriate for any unmet needs from SHB to be met within Wokingham as they are not directly connected.</p> <p>It would seem reasonable that additional provision on land currently not identified can be expected – SHBC should take account of this in considering whether a shortfall exists in reality once the emerging Policy H11 is applied.</p>



Authority	Response	Able to Assist?	Other Comments
			WBC would welcome clarification from SHBC regarding how the accommodation needs of Gypsies and Travellers falling outside the scope of the PPTS definition will be addressed.
<b>Runnymede Borough Council</b>		Unable to meet any unmet needs.	Response to matter of unmet needs included within Reg18 GTTS consultation response.
<b>Elmbridge Borough Council</b>	No response – chaser sent 06/10		
<b>Epsom &amp; Ewell</b>	Will be undertaking public consultation on a Regulation 18 Draft Local Plan later this year. Recently published a GTAA which identifies the need for 10 Gypsy and Traveller pitches over the Plan period which is a significant change from the 2017 GTAA which did not identify any additional need.	Unable to assist in meeting any unmet needs.	
<b>Reigate &amp; Banstead</b>	No response – chaser sent 06/10		





Authority	Response	Able to Assist?	Other Comments
<b>Rushmoor</b>	Drew attention to the response to the Draft Local Plan (dated 6 June 2022) which outlined that Rushmoor had no comments to make on the plan and that they would not have sites to accommodate any unmet gypsy and traveller accommodation needs and would expect to meet the needs of travelling showpeople from land within Rushmoor Borough.	Unable to accommodate any unmet needs.	



## Appendix 9: Duty to Cooperate letter (Gypsies and Travellers and Travelling Showpeople), September 2023 (slight wording amendments were made depending on whether they attended the Gypsy and Traveller Duty to Cooperate briefing session)



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**Our Ref:** N/A  
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**To whom it may concern**  
**[Local Authority Name]**  
**By Email**

**9<sup>th</sup> October 2023**

**To whom it may concern,**

### **Duty to Co-operate: Surrey Heath Local Plan Gypsy and Traveller and Travelling Showpeople needs**

As you will be aware, Surrey Heath is in the process of preparing a new Local Plan. The Borough is heavily constrained by environmental and planning constraints, which makes meeting housing needs challenging. In particular, environmental and planning constraints and lack of suitable and deliverable sites are a particular constraint on meeting the identified needs for Gypsy and Traveller pitches and Travelling Showpeople plots.

Across the plan-making process, the Council has undertaken a significant portfolio of work to seek to identify sites to meet the Council's needs for Gypsies and Travellers and Travelling Showpeople (please see <https://www.surreyheath.gov.uk/local-plan-evidence-base/travellers> and <https://surreyheathplanningpolicy.inconsult.uk/R18GTTSA/consultationHome>). This has included:

- Developing a site identification methodology against which site suitability could be assessed;
- Assessment of over 100 privately and publicly owned land against the methodology;
- Detailed feasibility and evidence based work on selected sites;
- A call to Elected Members for further site suggestions;



- Engaging with key landowners and stakeholders within Surrey Heath, including the MoD;
- Exploring the feasibility of purchasing land for sale within the Borough;
- Review and subsequent relaxation of assessment criterion contained within the site identification methodology and associated review of conclusions reached in respect of sites previously assessed;
- Four call for sites exercises across the period 2016 – 2022.
- Engaging with duty to co-operate bodies as to whether any unmet need can be accommodated elsewhere.

Last year, Surrey Heath consulted on a Regulation 18 Draft Plan between March and May 2022. At the time of the publication of the Draft Local Plan, the Council had been unable to identify sufficient sites to meet its identified needs for Gypsies and Travellers and included only one site allocation for a Gypsy and Traveller site for 4 pitches at Diamond Ridge Woods, Camberley.

The Council recognised the need to undertake additional work to seek to identify further Gypsy and Traveller and Travelling Showpeople site allocations options. This resulted in two further potential Gypsy and Traveller sites and one potential Travelling Showpeople site being identified to help address the identified needs in the first five years of the Plan period following adoption. These were consulted on in the Draft Local Plan Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople (Regulation 18) document, which was undertaken in August – September last year.

We last wrote to our Duty to Cooperate partners at the time of the Draft Local Plan Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople (Regulation 18) consultation,. In that letter, dated 16<sup>th</sup> August we advised that:

- Whilst sufficient site assessment work has been undertaken to support the relevant Regulation 18 consultations, further detailed feasibility work would need to be undertaken in order to establish the ultimate deliverability of the potential site allocations.
- The Council would continue work to identify further deliverable or developable Gypsy and Traveller sites and Travelling Showpeople plots,



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**Page 3 of 4**

however, land availability and environmental constraints continue to prove significant barriers to the identification of further opportunities to meet the needs. In view of this, the Council may be unable to identify sites sufficient to meet the Council's full identified needs over the plan period;

The Council is finalising the detailed feasibility work in respect of the sites identified to inform site deliverability. This evidence will determine whether the sites are included as site allocations within the forthcoming Regulation 19 Pre Submission Local Plan. However, as set out in the Council's recent duty to co-operate Gypsy and Traveller and Travelling Showpeople briefing, the Council has concerns that the feasibility work may demonstrate that a number of these sites are not deliverable.

We are sorry that you were not able to attend our recent Gypsy and Traveller and Travelling Showpeople briefing, however if there is any further engagement, specifically under the duty-to-cooperate, which you consider we should be taking ahead of the forthcoming Regulation 19 Local Plan then please let us know.

In view of the high risk of a shortfall against the Council's identified needs, despite the significant portfolio of work undertaken, we are also writing to you again under the duty to co-operate to ask whether your Council would be able to assist Surrey Heath Borough in accommodating any potential unmet Gypsy and Traveller or Travelling Showpeople needs.

I would also be grateful if you could also confirm your Council's current Local Plan position regarding meeting your identified needs for Gypsies and Travellers and Travelling Showpeople.

I look forward to receiving your response on this matter and it would be helpful if we could receive this by 5 November 2023. I would be grateful if responses could be sent by email to [planning.policy@surreyheath.gov.uk](mailto:planning.policy@surreyheath.gov.uk) Should you have any queries regarding the above, or would like further discussion, please do not hesitate to contact me using the details provided or Kate Galloway at [kate.galloway@surreyheath.gov.uk](mailto:kate.galloway@surreyheath.gov.uk).



Yours faithfully,

Jane Reeves  
Planning Policy Manager



## Appendix 10: Responses to September 2023 Duty to Cooperate letter regarding Gypsy and Traveller and Travelling Showpeople Needs, October 2023

Authority	Comments
<b>Bracknell Forest Borough Council</b>	<p>Sets out that the Bracknell Forest Local Plan is at an advanced stage of preparation with consultation currently taking place on Main Modifications.</p> <p>The Local Plan has a cultural need of eight pitches, four in the short term and four longer term.</p> <p>Whilst short term needs can be met, following the Inspector's recommendations to remove a strategic site, longer term needs cannot be met. The Inspectors appear to accept this will be met through the Development Management process.</p> <p>The GTAA, 2022 identifies a need for five travelling showpeople plots, however the GTAA suggests this can be met on the existing site.</p> <p>Given their own unmet needs, Bracknell Forest confirm that they are unable to assist Surrey Heath in meeting any unmet gypsy, traveller or travelling showpeople needs.</p>
<b>Elmbridge Borough Council</b>	<p>Explain that their need for traveller accommodation is set out in the Gypsy and Traveller Accommodation Assessment, 2020. This looks at the needs of those that meet the planning definition, those that are undetermined in term of the definition and those that do not meet the definition.</p> <p>The Gypsy, Roma and Traveller Site Assessment Study, 2022 identified sites to meet the Borough's needs. Taking into account the recommendations in the GTAA and a grant of permission for 8 pitches the Council has not had to allocate sites in its draft Local Plan. The approach is to permit additional pitches on existing sites and windfall sites.</p> <p>Confirm that they are unable to assist in meeting any unmet Gypsy, Traveller or Travelling Showpeople needs at this time.</p>
<b>Guildford Borough Council</b>	<p>Found the recent D2C briefing very useful and appreciate the difficulties in finding suitable land for all competing land uses having been through the same process themselves.</p>



Authority	Comments
	<p>Set out that their Local Plan has a target based on the findings of the Traveller Accommodation Assessment which includes those meeting the planning definition, travellers not meeting the PPTS definition and those of unknown planning status. This totals 53 pitches and 8 plots. Sufficient sites are identified in the Local Plan for those meeting the planning definition and to seek to meet those that do not meet the definition with a small degree of headroom to ensure delivery. This headroom cannot be used to meet unmet needs elsewhere.</p> <p>Confirm that Guildford Borough is unable to help meet any potential unmet traveller accommodation needs.</p>
<b>Hampshire County Council</b>	<p>Sets out that HCC understand the challenges that SHBC is facing to meet the identified need for sites.</p> <p>Confirms that it is not able to offer any assistance on this matter as it does not have any land or development assets that are in close proximity to the Borough that could be made available for traveller sites.</p>
<b>Hart District Council</b>	<p>Confirm that Hart is not in a position to accept any unmet need for Traveller and Travelling Showpeople Accommodation.</p> <p>The adopted Hart Local Plan sets out a commitment to prepare a GTAA and a subsequent DPD to address any unmet needs. The GTAA, 2020 identified needs for traveller households that meet (24 pitches) and do not meet (20 pitches) the planning definition and 5 plots for Travelling Showpeople.</p> <p>Needs remain largely unmet and a Call for sites in 2019 did not yield any suitable site options. Work on the Traveller DPD is paused and needs will now be met through a future review of the Local Plan. Under current legislation the Council must 'review' its plan by April 2025 and decide whether to update but Hart is mindful of emerging changes to the plan-making process.</p> <p>Hart asks whether Surrey Heath has considered integrating traveller accommodation within larger site allocations as has been done elsewhere.</p>
<b>Mole Valley District Council</b>	<p>Set out that the emerging Local Plan is at Examination but is currently on pause until publication of the proposed changes to the NPPF. Assuming those NPPF changes consulted on are put in place, the Council expects to withdraw all of its Green Belt sites from the Plan.</p>



Authority	Comments
	<p>The stage of plan making precludes Mole Valley from taking any unmet needs.</p> <p>Even if it were at an earlier stage it would still be unable to meet unmet needs.</p> <p>There is an identified need for 52 Gypsy and Traveller pitches (for both planning and housing definitions). The strategy is currently to meet this need through new pitches on allocated strategic sites and/or intensifying existing sites. As most of these are Green Belt sites, if these are withdrawn from the Plan there will be increased emphasis on the latter. Whilst needs can, in theory still be met, supply will be tight.</p> <p>In relation to Travelling Showpeople, there is a need for four plots in the first five years of the Plan period and two additional plots beyond that. In preparing the Plan, no site has been identified, although need may be met through redevelopment of brownfield land that becomes available during the plan period or on one of the strategic housing sites although if strategic Green Belt sites are withdrawn from the Plan this will decrease the ability to meet the need, increasing reliance on windfall brownfield land.</p>
<b>Reigate &amp; Banstead Borough Council</b>	<p>Welcome the engagement and the interesting duty to cooperate briefing. Note that Surrey Heath is a duty to cooperate partner which has been identified as having a shared interest in Gypsy and Traveller Planning in their Duty to Cooperate Framework (May 2023).</p> <p>Set out the findings of the RBBC Gypsy and Traveller Accommodation Assessment , 2017 which has been incorporated into the Development Management Plan, adopted 2019.</p> <p>Note that their target in Policy GTTI includes both those meeting the ‘planning’ traveller definition and those meeting the ‘equalities’ Traveller definition. The delivery of pitches and plots is monitored annually and published each June.</p> <p>Note the level of need in Surrey Heath and the challenges faced in finding deliverable and developable sites and a ‘high risk of a shortfall’.</p> <p>Set out that although good progress has been made in meeting their identified needs there are a large number of unauthorised caravan pitches. The Development Management Plan will be reviewed before next September including their current pitch and plot target.</p>





Authority	Comments
	<p>They are therefore not in a position to attempt to accommodate any unmet needs in Surrey Heath.</p>
<p><b>Royal Borough of Windsor &amp; Maidenhead</b></p>	<p>Set out that RBWM adopted their Local Plan in February 2022 but this did not include specific allocations to meet the needs of gypsies and travellers and travelling showpeople. The intention is that this will be dealt with through a separate Traveller Local Plan with some early work undertaken and an updated GTAA in 2021.</p> <p>The GTAA shows a high level of need with a net need of 51 pitches for those that meet the planning definition as well as a shortfall of 16 plots for travelling showpeople of which 14 meet the planning definition.</p> <p>In light of this need, and the constraints in the borough, it may not be in a position to meet those needs itself and as such is not in a position to accommodate any potential unmet needs arising from Surrey Heath.</p>
<p><b>Runnymede Borough Council</b></p>	<p>Thanked the Council for the recent briefing session.</p> <p>With regard to the Local Plan position, the adopted Local Plan (July 2020) sets out a strategy to meet the full needs of Gypsies and Travellers (83 pitches). Confirm that there is no spare provision to meet unmet needs from other local authorities. The Plan identifies a strategy to meet 10 of the 19 plots required for Travelling Showmen.</p> <p>Confirm that Runnymede BC would not be able to meet any unmet needs from Surrey Heath. This is partly as the Local Plan was not prepared on this basis and no overprovision is expected but is also due to the constraints in the Borough.</p>
<p><b>Rushmoor Borough Council</b></p>	<p>Note that the Rushmoor GTAA identified a need for two additional plots for Travelling Showpeople. The Local Plan allocated two sites to meet this need, one of which has been implemented.</p> <p>Rushmoor has no permanent authorised or legal transit Gypsy and Traveller sites and very little locally generated demand. Only 1 pitch was identified as being needed through the GTAA and the provision of this was not considered a pragmatic solution.</p> <p>No potential sites have been submitted through the call for sites exercises alongside the Local Plan.</p> <p>Rushmoor do not therefore consider that it is able to meet any potential unmet needs for gypsies, travellers or travelling showpeople arising from</p>



Authority	Comments
<p><b>Surrey County Council</b></p>	<p>Surrey Heath, but notes that it is currently able to meet its own needs.</p> <p>Thank the Council for the duty to cooperate briefing. Responding as Highways Authority and Lead Local Flood Authority on specific sites. These reinforce previous comments made in September 2022.</p> <p><b>Swift Lane extension, Bagshot</b> Refer to previous flooding comments and note further reports of internal and external flooding in January 2023. Comment on detailed flooding considerations and the need to consult the Environment Agency.</p> <p><b>Land south of Broadford Lane, Chobham</b> Refer to previous comments on flooding and flood risk issues associated with the site. Also note previous comments relating to highway safety issues and the need for a Transport Assessment.</p> <p><b>Bonds Drive Extension, Pennypot Lane, Chobham</b> Refer to previous comments on flooding and the need to consult the Environment Agency.</p> <p><b>Diamond Ridge Woods</b> Note there is a surface water flow route through the site and any development within the site should be placed sequentially with areas at lowest risk of surface water flooding. Unlikely to hold flooding records for the site.</p>
<p><b>Tandridge District Council</b></p>	<p>Recognise the constraints in Surrey Heath and welcomes the Councils approach to leave 'no stone unturned' in seeking to meet needs.</p> <p>Note that the emerging Local Plan is at Examination but that the Inspector has recommended that the Local Plan should not be adopted. Tandridge are awaiting the Inspectors Report to better understand the soundness issues. It is possible that the Local Plan will be withdrawn from examination.</p> <p>The Council is looking to update the 2017 GTAA next year with the intention of meeting their own needs if possible. The current GTAA suggests joint working across Surrey on transit provision and further discussions may be needed once the evidence is updated.</p> <p>Set out that the District is highly constrained and that the targets in the emerging Local Plan were ambitious.</p>



<b>Authority</b>	<b>Comments</b>
	Tandridge is therefore highly unlikely to be in a positive position to meet any demonstrated unmet Gypsy and Traveller and Travelling Showpeople need arising in Surrey Heath.
<b>Waverley Borough Council</b>	Sets out that Waverley would be unable to assist in meeting any unmet needs for gypsy and traveller sites within Surrey Heath. Note that the Council recently adopted the Local Plan Part 2 (March 2023) which contains site allocations to meet gypsy and traveller needs. Preparation of a new Local Plan to cover the period 2023 – 2043 is beginning and will include reassessing future needs.
<b>Woking Borough Council</b>	Confirmed that the position is as set out in previous responses. The Site Allocations DPD (adopted 2021) identifies land and allocates sites to enable the delivery of policies in the Core Strategy. This includes the release of land from the Green Belt to deliver sites for Traveller accommodation. Woking has similar challenges regarding environmental constraints with approximately 60% of the Borough being Green Belt. There is a lack of deliverable traveller sites within the urban area. The Council is unable to identify any additional sites suitable for Traveller accommodation. The Council is starting work on a new local plan. This is likely to be under the new system. When considering sites for Gypsy and Traveller and Travelling Showpeople accommodation they will consider what capacity exists and any scope to meet unmet needs. Given the different local plan timelines and the reasons above Woking Borough Council would be unable to assist Surrey Heath Borough Council in meeting any unmet Traveller accommodation needs.



## Appendix I I: Duty to Cooperate letter to Neighbouring Portfolio Holders, July 2024



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....

**By Email**

**10th July 2024**

**To ....**

### **Duty to Co-operate: Surrey Heath Local Plan Gypsy and Traveller and Travelling Showpeople needs**

As you may be aware, Surrey Heath is preparing a new Local Plan. The Borough is heavily constrained by environmental, flooding and other planning constraints which, in combination with land availability issues, means that it has been challenging to find deliverable sites to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople.

Evidence indicates that the Council has an identified need for at least 35 pitches for Gypsies and Travellers and 14 plots for Travelling Showpeople meeting the revised planning definition across the plan period. The Council also has an identified need for a further pitch for Gypsies and Travellers whose travelling history is unknown and 29 pitches for Gypsy and Traveller households that did not meet the planning definition.

Across the plan-making process, the Council has undertaken a significant portfolio of work to seek to identify sites to meet the Council's needs for Gypsies and Travellers and Travelling Showpeople (please see <https://www.surreyheath.gov.uk/local-plan-evidence-base/travellers> and <https://surreyheathplanningpolicy.inconsult.uk/R18GTTSA/consultationHome>). This has included:

- Developing a site identification methodology against which site suitability could be assessed;



- Assessment of over 100 privately and publicly owned sites against the methodology;
- Detailed feasibility and evidence based work on selected sites;
- A call to Elected Members for further site suggestions;
- Engaging with key landowners and stakeholders within Surrey Heath, including the MoD;
- Exploring the feasibility of purchasing land for sale within the Borough;
- Review and subsequent relaxation of assessment criterion contained within the site identification methodology and associated review of conclusions reached in respect of sites previously assessed;
- Four call for sites exercises across the period 2016 – 2022.

In addition to the above, the Council has already engaged at Officer level with Local Authorities through the duty to co-operate across the plan making process, to highlight the challenges of identifying sites for Gypsies and Travellers and Travelling Showpeople in the Borough and to understand whether any unmet need can be accommodated elsewhere. To date, no other local authority has identified that it is able to meet unmet needs, with many citing similar challenges to delivery. Whilst we recognise the challenges faced by other authorities, we are required to ask again and at Member level if any local authority is able to assist in meeting any potential unmet accommodation needs.

The extensive work undertaken to identify sites to help meet the Council's needs has culminated in three potential Gypsy and Traveller sites and one potential Travelling Showpeople site being consulted on at the Regulation 18 stage of the plan-making process. However, further feasibility work has now been completed in respect of these sites and only one site, comprising a 5-pitch extension to an existing Gypsy and Traveller site at Swift Lane, Bagshot, has been identified as deliverable. As such, it is expected that this site, which will require the release of Green Belt, be carried forward as a site allocation in the Pre-Submission Surrey Heath Local Plan (2019 – 2038) Regulation 19 publication.

In view of the above, it is highly unlikely that the Council will be able to meet the accommodation needs of the borough's Gypsy and Traveller community



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through an appropriate number of site allocations, with the Council expected to have a shortfall of 26 pitches against the Council's identified needs for Gypsies and Travellers meeting the planning definition and 14 plots against the Council's identified needs for Travelling Showpeople meeting the planning definition.

Surrey Heath Borough Council remains strongly committed to seeking to meet as much of its identified needs as possible and accordingly, a number of Policies have been updated in the Regulation 19 Local Plan to provide a more permissive approach that encourages unallocated Gypsy and Traveller sites to come forward to help address this need.

Notwithstanding this, in view of the anticipated shortfall in allocated sites against the Council's identified needs, we are now writing to you in your capacity as **Portfolio Holder for ...** under the duty to co-operate to ask again whether your Council would be able to assist Surrey Heath Borough in accommodating any potential unmet Gypsy and Traveller or Travelling Showpeople needs.

I look forward to receiving your response on this matter and it would be helpful if we could receive this by 24<sup>th</sup> July. I would be grateful if responses could be sent by email to [planning.policy@surreyheath.gov.uk](mailto:planning.policy@surreyheath.gov.uk)

Should you have any queries regarding the above, or would like a meeting to discuss this matter further, please do not hesitate to contact me using the details provided or Kate Galloway at [kate.galloway@surreyheath.gov.uk](mailto:kate.galloway@surreyheath.gov.uk).

Yours sincerely,

Cllr Alan Ashbery  
Homes, Planning & Enforcement Portfolio Holder  
Surrey Heath Borough Council

