



# Sustainability Appraisal (SA) of the Surrey Heath Local Plan

## SA Report

June 2024



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# 1 Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Surrey Heath Local Plan. Once adopted, the Local Plan will establish a strategy for growth and change within Surrey Heath Borough up to 2038, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.<sup>1</sup>

## 1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that essentially appraises “the plan, and reasonable alternatives”.<sup>2</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:
- What has plan-making / SA involved up to this point?
    - including consideration of reasonable alternatives
  - What are the SA findings at this stage?
    - i.e. in relation to the draft plan
  - What are next steps?

## 1.3 This SA Report

- 1.3.1 Following several consultations under Regulation 18, the Council has now prepared the formal draft plan, known as the pre-submission plan, for ‘publication’ under Regulation 19 of the Local Planning Regulations.
- 1.3.2 As such, this is the formal SA report. It presents an appraisal of “the plan and reasonable alternatives”, along with other prescribed information, aimed at informing representations and plan finalisation.<sup>3</sup>

### Structure of this report

- 1.3.3 This report is structured according to the **three questions** above.
- 1.3.4 Before answering the first question, there is a need to further set the scene by introducing:
- the plan scope; and
  - the SA scope.

### Commenting on this report

- 1.3.5 This report can be referenced as part of representations on the plan and/or representations can be made specifically on any part of this report. The intention is for issues raised through representations to be summarised and submitted for consideration by one or more Planning Inspectors as part of an Examination in Public (EiP). See further discussion within Part 3 of this report (Next steps).

<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

<sup>2</sup> Regulation 12(2) of the SEA Regulations

<sup>3</sup> See **Appendix I** for a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

## 2 The plan scope

### 2.1 Introduction

2.1.1 The aim here is to briefly introduce: the plan area; the plan period; the legislative and policy context; and the objectives that are in place to guide plan preparation.

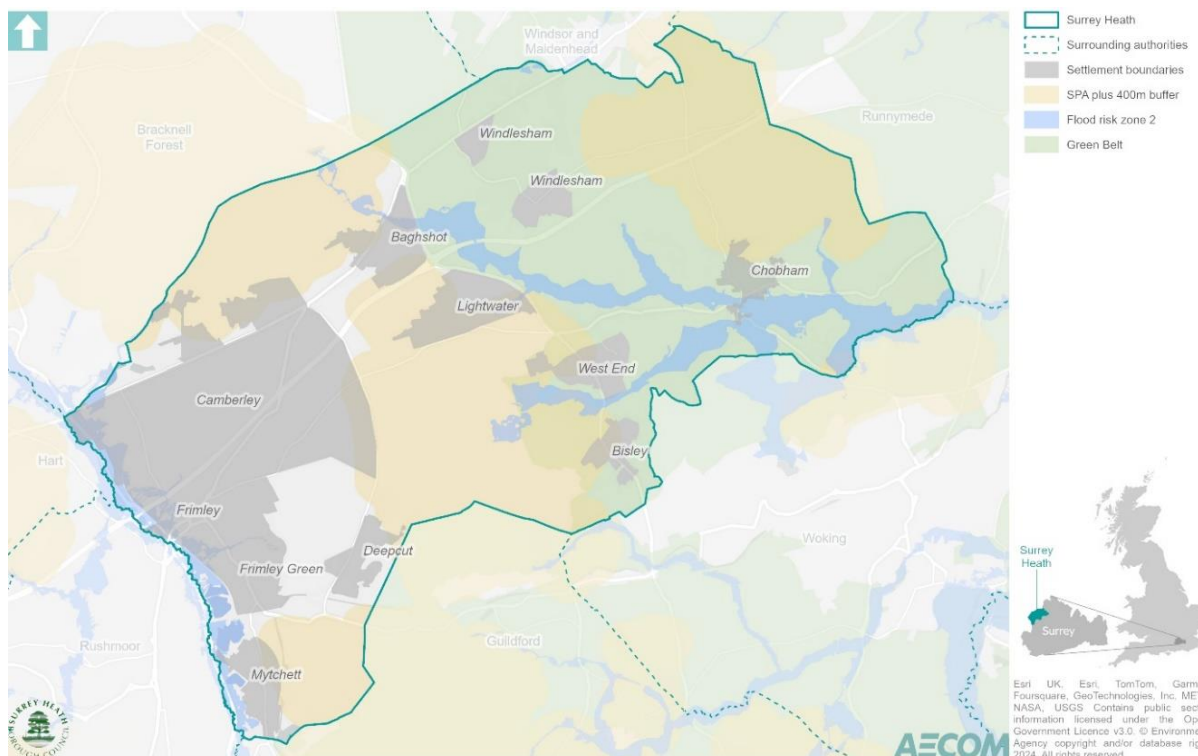
### 2.2 The plan area

2.2.1 Surrey Heath lies in the north west corner of Surrey and adjoins the counties of Berkshire and Hampshire. The north and east of the borough comprises countryside strongly associated with heathlands, from which the borough derives its name. The borough is relatively small, with a population of 90,500 in 2021.

2.2.2 The London Metropolitan Green Belt stretches across the eastern half of the borough, as far west as Bagshot, Lightwater and a large area of MOD land that also comprises internationally designated heathland. Specifically, the MOD heathland is one of the four component parts of the Thames Basin Heaths Special Protection Area (TBHSPA) that intersect the borough – see Figure 2.1.

2.2.3 The great majority of the western half of the borough is either built-up or constrained by the TBHSPA, with only a small area of Countryside Beyond the Green Belt falling outside of the TBHSPA 400m buffer zone, and much of this land is locally designated as a Site of Nature Conservation Importance (SNCI) and/or constrained by historic environment designations (Bagshot Park and Sandhurst Royal Military College).

Figure 2.1: Green Belt and headline environmental constraints



2.2.4 The western half of the of the borough contains the Camberley / Frimley / Frimley Green urban area and the villages of Bagshot, Deepcut and Mytchett. The east of the borough is more rural, and includes the villages of Bisley, Chobham, Lightwater, West End and Windlesham. Chobham is ‘washed over’ by the Green Belt in the adopted Local Plan, but the Draft Local Plan (2022) proposed that it should be inset, as per other villages, and this remains the proposal at the current time within the Pre-submission Plan.

2.2.5 The borough is strongly associated with the M3 corridor, with Hart District and Basingstoke to the west (both in Hampshire), and East Surrey / London to the east. The borough is also located at the northern extent of the A331 Blackwater Valley Road, via which (also via rail) there are very close links to a series of settlements to the south, including Farnborough and Aldershot within Rushmoor District (Hampshire).

- 2.2.6 The Blackwater Valley has long been seen as an important regional economic hub and, aligned with this, at the time of preparing the Hart and Rushmoor Local Plans these authorities were identified as sharing a Housing Market Area (HMA) and Functional Economic Area (FEA) with Surrey Heath.<sup>4</sup> Other centres that the borough links to include: Bracknell to the north (mainly by road), Woking to the southeast (very closely linked), Guildford to the southeast (well linked by rail), and Reading to the north west (well linked by rail).
- 2.2.7 Within the borough Camberley is key population, retail, commercial and employment centre. The Enterprise M3 Local Enterprise Partnership (LEP) has now ceased to function (with its functions locally passing to Surrey County Council) but it remains notable that the LEP's Strategic Economic Plan (2020) identified Camberley as a 'step-up town' meaning that it is not realising its full economic potential.
- 2.2.8 The majority of employment floorspace is located in Camberley and Frimley across nine industrial estates / business parks. There are also four single occupancy sites that are home to major businesses; one located in Frimley, one near Mytchett, and two near the rural settlement of Windlesham. Fair Oaks Airport employment area in Chobham also provides employment use within the local area.
- 2.2.9 Good access to key employment areas, including Farnborough, Reading, Heathrow and London, means that the borough sees net out-commuting. Surrey Heath is served by three rail stations at Bagshot, Camberley and Frimley with trains operating on a branch line service between Ascot and Guildford. All three stations have poor access to London Waterloo, hence many commuters living in Surrey Heath use nearby faster services from stations outside the borough at Farnborough, Woking and Sunningdale.
- 2.2.10 As well as employment, Camberley is also the primary hub for provision of community services and facilities, and the Council has identified the delivery of an improved Camberley town centre as a priority. As part of this, the Council has pro-actively delivered a number of improvements including the acquisition and improvement of town centre property, and significant public realm enhancements. The redevelopment of a 1.9 ha site at London Road remains the single biggest regeneration opportunity in the town centre.
- 2.2.11 Aside from Camberley town centre, Bagshot and Frimley benefit from a district centre, and there are also a number of local centres and neighbourhood parades across the borough. The most significant out-of-centre retail exists at Bagshot retail park, whilst the Meadows retail park is just outside the borough.
- 2.2.12 In the Indices of Multiple Deprivation 2019, Surrey Heath is ranked as the 9<sup>th</sup> least deprived local authority in England. However, this masks pockets of much higher levels of relative deprivation, with the three worst performing areas associated with different locations within the western urban area.
- 2.2.13 Finally, as part of this initial discussion, which seeks to briefly introduce the plan area, there is a need to note the large residential scheme currently under construction at the former Princess Royal Barracks in Deepcut (Mindenhurst). In total, this is delivering around 1,200 dwellings and associated infrastructure.

## 2.3 The plan period

- 2.3.1 The Draft Local Plan (2022) proposed a plan period of 2019 to 2038, and evidence-base work underpinning the plan-making process has been undertaken on that basis. This will mean the duration of the plan is for 19 years from 1st April 2019 to 31st March 2038.
- 2.3.2 At the time it was intended that in accordance with the guidance in the NPPF, the plan period from the point of adoption would be 15 -16 years. The NPPF (para 22) states: "*Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long term requirements and opportunities, such as those arising from major improvements to infrastructure.*"
- 2.3.3 However, due to various unforeseen delays in the process, arising from matters including uncertainty and delays regarding emerging and published changes to national policy and legislation, as well as further evidence base production, the plan period from adoption will now be 12 -13 years. Further detail is set out in the Spatial Strategy Topic Paper 2024.
- 2.3.4 The Council has considered increasing the plan period by 3 or more years. However, this would inevitably mean accounting for higher growth scenarios including housing need. This would require further evidence base work to ensure deliverable options and accompanying delays in the plan making process.

<sup>4</sup> Both geographies are discussed within the Government's PPG, including for [effective cooperation](#) and [economic need](#).

- 2.3.5 A further issue concerns the transitional arrangements for plan making which requires the draft plan to be submitted by June 2025. The Council is proceeding under those arrangements and for the reasons above this deadline will not be able to be met if the longer plan period is considered at this stage.
- 2.3.6 The Council has also had regard to the fact that it is required to undertake a review of the plan within 5 years under the existing legislative provisions and to prepare a new style local plan under the new legislative provisions once in force.
- 2.3.7 Overall, the Council has: *“weighed the various considerations and decided that the only course of action that would not significantly delay the preparation and adoption of an up to date local plan and represents an appropriate strategy having regard to proportionality is to retain the plan period to 2038.”*

## 2.4 Context to plan-making

- 2.4.1 The Government has signalled its intention to make significant changes to the English planning system under the Levelling Up and Regeneration Act. However, the Government has also reiterated the importance of maintaining progress to get up to date local plans in place and, to this end, published a revised NPPF in December 2023. A primary consideration, central to the NPPF (paragraph 11) is a requirement to maintain an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development.
- 2.4.2 The plan is also being prepared taking account of objectives and policies established by various organisations at national and local levels, under the Duty to Cooperate established by the Localism Act 2011. Perhaps most notably, key context is provided by policy/strategy set by Surrey County Council, which has traditionally involved a key focus on transport, education and minerals / waste, but now also extends to planning for the local economy (with this function having passed from Enterprise M3 LEP to Surrey County Council in 2023). Surrey Heath Borough also cooperates with neighbours including Bracknell Forest, Windsor and Maidenhead, Runnymede, Woking, Guildford, Rushmoor and Hart.
- 2.4.3 Finally, it is important to note that the plan will be prepared mindful of the ‘made’ Windlesham Neighbourhood Development Plan (NDP) and the emerging NDPs for Deepcut and Chobham. NDPs must be in general conformity with the local plan, but it is also the case that NDPs, both made and emerging, are a consideration when preparing the local plan.

## 2.5 Plan objectives

- 2.5.1 The plan objectives are broadly unchanged from those presented at the time of the Draft Plan consultation:
- Deliver sustainable development that contributes to meeting **housing needs**, providing new homes of an appropriate mix and tenure, including provision of affordable and specialist housing needs.
  - Facilitate strong **economic performance** in the Borough and wider Functional Economic Area (Hart, Rushmoor and Surrey Heath) through the safeguarding of identified employment sites and supporting development for employment purposes on those sites and other appropriate locations.
  - Enhance the vitality and viability of **Camberley Town Centre** and the other District and Local centres within the Borough.
  - Ensure that development within the Borough is supported by the necessary physical, social and green **infrastructure** to meet the needs of future Surrey Heath residents.
  - Ensure that development does not have a detrimental impact on the Borough’s **environmental assets** including designated international and national sites, landscape character, water quality and biodiversity and that new development delivers biodiversity and environmental net gains and contributes to restoring habitat and ecological connectivity.
  - Ensure that new development minimises or mitigates the impact of development on **air quality**, noise, light **pollution**, odours, emissions and particulates.
  - Ensure that new development, unless appropriate development under the Exceptions Test, is not located in areas of high or medium risk of **flooding**... [or] increase surface water run-off.

- Deliver action on **climate change** and reduction of the Borough's carbon emissions, supporting the transition to net zero through a combination of **mitigation and adaptation** measures, including the appropriate delivery of opportunities for renewable energy, energy efficiency and improving resilience...
- Protect the character and purpose of the **Green Belt** and the character of the **countryside** beyond the Green Belt.
- Conserve and enhance the Borough's **built environment and heritage assets**, both designated and non-designated.
- Promote healthy, sustainable, and cohesive local **communities** through good design, and access to homes, employment, community and recreational facilities.
- Support measures that prioritise active and **sustainable travel** modes including improved facilities for pedestrians and cyclists and improvements to public transport.

## 3 The SA scope

### 3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of the plan and reasonable alternatives. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA, and **Appendix II** presents further information. However, it is not possible to define the SA scope comprehensively. Rather, there is a need for the SA scope to be flexible and adaptable, responding to the nature of the emerging plan and reasonable alternatives, as well as the latest context and evidence-base.

### 3.2 Consultation on the scope

- 3.2.1 The Strategic Environmental Assessment (SEA) Regulations 2004 require that: *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies.”* In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>5</sup> As such, these authorities were consulted on the SA scope in 2017.
- 3.2.2 The outcome was an SA ‘framework’ comprising **26 objectives** grouped under **5 topics**. The framework was then used to structure the appraisal presented in the 2018 Interim SA Report published as part of the Issues and Options/Preferred Options consultation. No comments were received on the SA scope.

### 3.3 The SA framework

- 3.3.1 In 2021 it was considered appropriate to rationalise the SA framework by grouping the **26 objectives** under **13 topics** and using this list of topics as the primary ‘level’ of the framework. This was considered appropriate with a view to ensuring an appraisal that is suitably structured, focused and concise.
- 3.3.2 Table 3.1 presents the list of 26 objectives (from the 2017 scoping stage) grouped under the new list of 13 topic headings. Some objectives appear under more than one topic heading (‘cross-cutting’).
- 3.3.3 This framework was used as the basis for structuring the appraisal work presented in the 2021 Interim SA Reports, and no comments were received. As such, the framework is unchanged at the current time.

<sup>5</sup> In-line with Article 6(3) of the SEA Directive, these bodies were selected because *“by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.”*



**Table 3.1: The SA framework**

Topic	Objectives
Accessibility [to community infrastructure]	<ul style="list-style-type: none"> <li>• Improve opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community.</li> <li>• Sustain and enhance the viability and vitality of town, district and local centres.</li> <li>• Improve the education and skills of the local population.</li> <li>• Maintain and improve cultural, social and leisure provision.</li> </ul>
Air / env quality	<ul style="list-style-type: none"> <li>• Ensure air quality continues to improve in line with national and/or WHO global targets.</li> <li>• Reduce noise pollution.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• Conserve and enhance the borough's biodiversity.</li> <li>• Ensure the protection of the Special Protection Areas (SPAs).</li> </ul>
Climate change adaptation <sup>6</sup>	<ul style="list-style-type: none"> <li>• Minimise the risk of flooding.</li> <li>• Encourage reduced water consumption.</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>• Reduce greenhouse gas emissions.</li> <li>• Increase energy efficiency and increase the use of renewable energy.</li> <li>• Encourage the use of more sustainable modes of transport (active and public) and reduce traffic congestion.</li> </ul>
Communities and health <sup>7</sup>	<ul style="list-style-type: none"> <li>• Improve the population's health.</li> <li>• Improve the education and skills of the local population.</li> <li>• Reduce crime, fear of crime and social exclusion.</li> <li>• Encourage the enjoyment of the countryside, open spaces and local biodiversity.</li> <li>• Sustain and enhance the viability and vitality of town, district and local centres.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>• Support inclusive and diverse economic growth.</li> <li>• Maintain stable levels of employment in the borough.</li> <li>• Support existing business structure and businesses.</li> <li>• Sustain and enhance the viability and vitality of town, district and local centres.</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>• Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Meet identified housing need.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings.</li> <li>• Maintain and enhance the quality of countryside, Green Belt and open space areas.</li> </ul>
Land, soils and resources	<ul style="list-style-type: none"> <li>• Make the best use of previously developed land (PDL) and existing buildings.</li> <li>• Reduce contamination and safeguard soil quality and quantity.</li> <li>• Reduce generation of waste and maximise re-use and recycling.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Encourage the use of more sustainable modes of transport (public transport/cycling/walking) and reduce traffic congestion.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Maintain and improve the quality of water resources.</li> <li>• Encourage reduced water consumption.</li> </ul>

<sup>6</sup> There are wide-ranging further climate change adaptation considerations, as discussed in *Addressing climate change through the Surrey Heath Local Plan* (AECOM, 2020), including the climate change risk assessment in [Appendix 1](#) of the report.

<sup>7</sup> The aim here is to discuss considerations over-and-above matters relating to access to community infrastructure, which are a stand-alone focus of discussion under the earlier 'Accessibility' heading, and mindful of the subsequent 'Housing' heading.

## **Part 1: What has plan-making / SA involved up to this stage?**

# 4 Introduction to Part 1

## Overview

4.1.1 Plan-making has been underway since 2017, with three consultations having been held prior to this current consultation, and three Interim SA Reports having been published - see Figure 4.1.

**Figure 4.1: Overview of the plan-making / SA process**

	Plan-making	SA
2017/18	Examine reasonable alternatives	
2018	Preferred and Alternative Options consultation	Interim SA Report
2019 - 2021	Re-examine reasonable alternatives	
2022	Draft Plan consultation	Interim SA Report
	Targeted work on Gypsies & Travellers reasonable alternatives	
	Targeted Gypsies & Travellers consultation	Interim SA Report
	Re-examine reasonable alternatives (whole plan)	
2024	Publication	SA Report
2024/25	Submission to Secretary of State	

4.1.2 The focus here, within Part 1, is not to relay the entire ‘backstory’ of the plan-making /SA process, or to provide a comprehensive audit trail of decision-making over time. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2024. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Section 5**;
- present an appraisal of the reasonable alternatives - see **Section 6**; and then
- explain the Council's reasons for selecting the preferred option - see **Section 7**.

4.1.3 Presenting this information is in accordance with the requirement to present an appraisal of reasonable alternatives and “an outline of the reasons for selecting the alternatives dealt with” within the SA Report.

### What about earlier stages of SA?

4.1.4 A considerable amount of work has been completed to date, including work to explore reasonable alternatives. Notably, the first Interim SA Report (see Appendix B of that report) appraised the option of meeting needs through brownfield only versus also allowing loss of greenfield; the second ISA report (Section 6) presented an appraisal of alternative ‘growth scenarios’; and the third report (Section 6) presented an appraisal of alternatives in respect of meeting Gypsy and Traveller accommodation needs.

4.1.5 Earlier work served as an input to the process of defining reasonable alternatives in 2024 and, as such, is discussed further below. However, earlier SA work is now out of date and, as such, need not be reported in full in this report (simply with a view to an ‘audit trail’). The aim is to present up-to-date analysis.<sup>8</sup>

### Reasonable alternatives in relation to what?

4.1.6 The legal requirement is to examine reasonable alternatives (RAs) taking into account the objectives of the plan (see Section 2). Following discussion of plan objectives with officers, it was determined appropriate to focus on the ‘spatial strategy’, i.e. providing for a supply of land, including by allocating sites and potentially broad areas (NPPF paragraph 69), to meet objectively assessed needs and wider plan objectives, as far as possible (i.e. as far as consistent with sustainable development, as per NPPF paragraph 11). Establishing a spatial strategy is clearly an overarching objective of the Local Plan.<sup>9</sup>

<sup>8</sup> N.B. consultation responses received under Regulation 18 are discussed throughout the report below, e.g. Section 5.2.

<sup>9</sup> It was also considered appropriate to focus on ‘spatial strategy’ given the potential to define “do something” alternatives that are meaningfully different, in that they will vary in respect of ‘significant effects’, as measured against the baseline. The Planning Practice Guidance is clear that SA “should only focus on what is needed to assess the likely significant effects of the plan”.

4.1.7 The decision was made to refer to the spatial strategy alternatives as **growth scenarios**.

#### What about site options?

4.1.8 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the Surrey Heath Local Plan. Rather, the objective is to allocate a *package* of sites to meet needs and wider plan objectives, hence RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining reasonable growth scenarios – see Sections 5.3 and 5.4.

#### Is the focus on housing sites?

4.1.9 Local plans are tasked with meeting both housing and wider development needs, including in respect of employment land. However, establishing a supply of land to meet housing needs is typically a matter of overriding importance, such that it warrants being the focus of work to explore growth scenarios. Also, it is important to be mindful of the pragmatic need to minimise the number of ‘moving parts’ within / across growth scenarios, to make the process manageable. Employment land is discussed below in some detail, as part of the process of arriving at growth scenarios, but the process can be described as ‘housing led’.

#### What about other aspects of the plan?

4.1.10 As well as establishing a spatial strategy, allocating sites etc., local plans must also establish policy on thematic borough-wide issues, as well as area and site-specific policies, to guide decision-making at the planning application stage. Broadly speaking, these are ‘development management’ (DM) policies.

4.1.11 It is a challenge to establish DM policy alternatives that are genuinely reasonable.<sup>10</sup> However, through discussion with Officers it was determined reasonable and appropriate to go through a process to explore this matter, which led to two sets of RAs being identified and appraised, specifically in respect of: 1) built environment decarbonisation; and 2) biodiversity net gain. Also, it was determined reasonable to explore RAs in respect of Chobham’s Green Belt status. **Appendices III and IV** present further information.

### Structure of this part of the report

4.1.12 This remainder of this part of the report is structured as follows:

- **Section 5** – explains a process leading to the definition of growth scenarios
- **Section 6** – presents an appraisal of the growth scenarios
- **Section 7** – presents SHBC’s response to the appraisal.

### Ownership of this part of the report

4.1.13 Finally, it is important to be clear that:

- Selecting reasonable alternatives is ultimately the responsibility of the plan-maker (SHBC), but AECOM is well placed to advise and write up the process (Section 5);
- Appraising the reasonable alternatives is the responsibility of AECOM (Section 6);
- Responding to the appraisal and deciding on the preferred approach is the responsibility of the plan-maker, because SA is ‘decision-informing’ not ‘decision-making’ (Section 7).

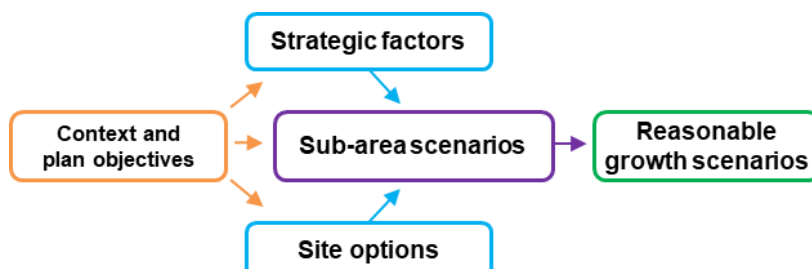
<sup>10</sup> Recalling that to be ‘reasonable’ alternatives must be meaningfully different, to the extent that it is ultimately possible for an appraisal to confidently differentiate between the alternatives in terms of significant effects.

# 5 Defining growth scenarios

## 5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios.

**Figure 5.1:** Defining reasonable growth scenarios



### Structure of this section

5.1.2 This section of the report is structured as follows:

- **Section 5.2** – explores **strategic factors** with a bearing on growth scenarios
- **Section 5.3** – considers **site options**, which are the ‘building blocks’ for growth scenarios
- **Section 5.4** – explores growth scenarios for individual **sub-areas** within the borough
- **Section 5.5** – draws upon the preceding sections to define reasonable **growth scenarios**

### A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence gathering and analysis that is proportionate, also recalling the legal requirement to present an “**outline of the reasons for selecting alternatives...**” [emphasis added].

## 5.2 Strategic factors

### Introduction

5.2.1 The aim of this section of the report is explore the strategic factors (issues and options) with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how many new homes are needed (regardless of capacity to provide them)?
- Distribution – which broad areas within the borough are more / less suited to growth, and what growth typologies are supported (e.g. the balance between strategic and non-strategic sites)?

### Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the borough, before exploring arguments for the Local Plan providing for a quantum of growth either above or below LHN.

### Background

5.2.3 A central tenet of plan-making is the need to **A**) establish housing needs; and then **B**) develop a policy response to those needs. This stems from NPPF para 11, and the Planning Practice Guidance (PPG):

*“Housing need is an unconstrained assessment of the number of homes needed in an area. **Assessing housing need is the first step** in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement figure...”*

- 5.2.4 With regards to (A), the NPPF (paragraph 61) states that **LHN** should be established via an assessment “conducted using the **standard method**” unless there are “*exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach...*”
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver this housing requirement (over time, i.e. year-on-year, which will invariably necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

#### Surrey Heath’s LHN

- 5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020.<sup>11</sup> This fourth step, known as the ‘cities and urban centres uplift’, does not have a bearing on the calculation of Surrey Heath Borough’s LHN.
- 5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections. Updates to the PPG in late 2020 then confirmed this approach; however, there is still a need to be mindful of more recent projections, which is a matter explored through the Surrey Heath Local Housing Needs Assessment (LHNA, 2024). In particular, the LHNA (2024) considers the 2021-based population (i.e. not household) projections released by the ONS in early 2024. These do indicate the possibility of a slight uplift to LHN, but the LHNA ultimately concludes “*it is not considered this is significant or exceptional.*”
- 5.2.8 The standard method derived LHN for the Borough is currently 321 dwellings per annum (dpa), or **6,111 homes over the plan period**. This is a ‘capped’ figure, meaning that step 3 of the standard method (“Capping the level of any increase”) applies. The uncapped figure is 337 dpa, i.e. very modestly higher.

#### Is it reasonable to explore setting the housing requirement at a figure below LHN?

- 5.2.9 Paragraph 11 of the NPPF states: “... *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*” [emphasis added]
- 5.2.10 As a corollary to this, Paragraph 010 of the PPG on Housing and Economic Needs explains: “... *there will be circumstances where it is appropriate to consider [higher growth]... Circumstances where this may be appropriate include... an authority agreeing to take on **unmet need** from neighbouring authorities...*”
- 5.2.11 Mindful of this context, and the evidence available at the time on housing capacity in Surrey Heath, the decision was made through the Hart Local Plan Examination in 2018 that Hart should make provision for unmet need from Surrey Heath. The Hart Local Plan explains that the housing requirement comprises LHN plus: “*An additional 41 homes per annum... to address an unmet housing need in Surrey Heath...*”
- 5.2.12 This commitment was subsequently confirmed through written correspondence and is confirmed in a Statement of Common Ground at the current time. Specifically, the commitment applies for the 13 years (2019-2032) covered by both plan periods, leading to 533 homes in total.
- 5.2.13 On this basis, there is a clear argument for setting the housing requirement below LHN, specifically at 6,111 – 533 = **5,578 homes over the plan period**.
- 5.2.14 This is equivalent to 294 dpa on average over the plan period. This figure breaks down as 280 dpa up to 2032 and then 321 dpa, but it is appropriate to focus on the average (294 dpa).
- 5.2.15 This is essentially the default housing requirement, and it was reflected within the housing trajectory published as part of the [SLAA 2023](#), which was published in March 2024.

<sup>11</sup> See [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments).

### Is it reasonable to explore higher growth scenarios?

- 5.2.16 The NPPF (para 67) explains: *“The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”*
- 5.2.17 However, in the Surrey Heath context there is little or no argument for exploring options involving providing for higher growth (i.e. above 294 dpa) on the basis of this guidance, broadly for two reasons:
- 5.2.18 Firstly, with regards to ‘growth ambitions’, the Local Housing Needs Assessment (LHNA, 2024) concludes: *“The economic led housing need outputs (250 dpa and 354 dpa) span the standard method (321 dpa). However, given the uncertainty with economic forecasts this would suggest that the standard method is an appropriate level of housing development to meet economic growth.”* Also, whilst Camberley is an important sub-regional economic hub, there is no identified higher housing growth opportunity.
- 5.2.19 Secondly, with regards to unmet needs, whilst there is a risk of unmet needs arising from East Surrey, there is little reason to suggest that Surrey Heath is well placed to provide for any unmet needs that do arise. First and foremost, this is on the basis of the environmental constraints affecting the borough (as discussed above and below). Also, it is important to note that Surrey Heath has been identified as falling within a different HMA to other Surrey authorities, as discussed.<sup>4</sup> Specific considerations are as follows:
- There is low risk of unmet needs arising from Surrey Heath’s adjacent neighbouring authorities (Bracknell Forest, Windsor and Maidenhead, Runnymede, Woking, Guildford, Rushmoor and Hart), all of which either have an up-to-date adopted local plan that makes provision for housing needs, or an emerging draft local plan that is well-advanced and makes provision for needs.
  - Woking is a constrained borough that is unable to meet housing needs in full through its local plan, but the adopted Guildford and Waverley local plans make provision for the unmet need.<sup>12</sup> It is recognised that Woking’s current plan period is only to 2027, leading to a risk of future unmet needs. However, there is little reason to suggest that Surrey Heath would be well placed to provide for any such unmet needs, because of the environmental constraints that exist, specifically TBHSPA components.
  - With regards to East Surrey, the simple fact is that there is very significant unmet need. For example, the Tandridge Local Plan Inspector’s Report (2024) explains: *“The Plan... would give rise to significant unmet housing need... In this round of Plan making [neighbours]... have stated that they are unable to help... Also relevant is the wider Surrey context... The [Interim Local Strategic Statement for Surrey] published in December 2017 identified... that Surrey was only likely to be able to meet approximately 50% to 75% of its... housing needs over the next 15 years and that few adjoining authorities will be able to [help].”* However, again, there is little or no reason to suggest that Surrey Heath is well placed to assist. A key point to note is that whilst Surrey Heath does have some countryside beyond the Green Belt (unlike East Surrey), this is limited in extent and heavily constrained, as discussed further below.
- 5.2.20 Finally, there is a need to consider affordable housing, with the PPG stating:<sup>13</sup> *“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”* In respect of affordable housing the LHNA (2024), which concludes:
- “When looking at needs from households unable to buy OR rent, the analysis suggests a need for 184 affordable homes per annum... This is slightly higher than the figure estimated in the 2020 Housing Needs Assessment (159 dwelling per annum)... Despite the level of need, it is not considered that this points to any requirement for the Council to increase the Local Plan housing requirement... That said, the level of affordable need does suggest the Council should maximise the delivery of such housing.”*
- 5.2.21 184 dpa amounts to 57% of the 321 dpa LHN figure, and there is no potential to deliver affordable housing as a proportion of market housing at this rate (in Surrey Heath or Hart). Also, the 184 figure is only in respect of affordable housing to rent, whilst there is also a need to consider affordable home ownership (AHO), albeit the LHNA concludes: *“When looking at AHO products, the analysis is less conclusive about the scale of the need, although it is certainly much lower than the need for rented affordable housing.”*
- 5.2.22 In summary, affordable housing needs provide a potential basis for exploring higher growth scenarios.

<sup>12</sup> Matters are explained within the recent Inspector’s Report for the Woking Site Allocations DPD, see paragraph 40 [here](#).

<sup>13</sup> See paragraph 024 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://gov.uk/guidance/housing-and-economic-development-needs-assessments)

### Conclusion on housing quanta options to examine further

- 5.2.23 Surrey Heath Borough is in a somewhat unusual situation, in that the default option for the Local Plan is *not* to set the housing requirement at LHN for the plan period (321 dpa), but rather at 294 dpa on average (specifically, 280 dpa to 2032 and then 321 dpa). As such, reasonable growth scenarios clearly need to include a focus on providing for **294 dpa** on average over the plan period.
- 5.2.24 Given the extent of Green Belt and SPA constraint there is also a case for exploring **lower-growth** scenarios (i.e. setting the housing requirement at a figure below 294 dpa), subject to detailed consideration of capacity/supply options (as discussed below).
- 5.2.25 With regard to **higher growth** scenarios, the constraints affecting Surrey Heath serve as a reason to suggest that these should be ruled out as unreasonable. However, there are also certain high level reasons for remaining alive to the possibility of a higher growth scenario, including in respect of affordable housing subject, to capacity and supply options which are discussed below.
- 5.2.26 The matter of precise quanta figures to reflect across the reasonable alternative growth scenarios is returned to within **Section 5.5**, subsequent to consideration of broad distribution options (the remainder of Section 5.2), site options (Section 5.3) and sub-area scenarios (Section 5.4).

**N.B.** it is important to be very clear that the aim of this section is not to reach conclusions, but only to discuss strategic factors with a view to establishing broad parameters.

## Broad distribution

### Introduction

- 5.2.27 This is the second of two sections examining 'strategic factors'. This section explores evidence relevant to broad distribution (also growth typologies) in **chronological order** before reaching a conclusion on key issues / opportunities and options that should feed into definition of the reasonable growth scenarios.

### Interim Capacity Study (2018)

- 5.2.28 An appropriate starting point is the Interim Capacity Study prepared in April 2018, ahead of the Issues and Options / Preferred Options consultation, which sets out "*key environmental and policy constraints to housing delivery that affect the Borough.*" The study went through a stepped process in order to justify a decision to propose a spatial strategy involving a housing requirement for the plan period *below* LHN.
- 5.2.29 Section 3 of the study considers constraints to growth under the following headings:

- Thames Basin Heaths SPA – the SPA is fragmented and is interspersed by urban areas, making it particularly vulnerable to the effects of new development and urbanisation, with the Surrey Heath Thames Basin Heaths SPA Supplementary Planning Document (SPD) highlighting key threats to the protected species as human activity including recreational activity such as dog walking. Predation by domestic cats is also a risk factor, as well as fly tipping and arson.

In 2009, the Thames Basin Heaths Joint Strategic Partnership Board (JSPB) endorsed a strategic Delivery Framework, which recommends a combination of three avoidance measures to protect the Heaths from the impact of new residential development, including the establishment of a 400 metre buffer around the SPA within which no net new residential development will be permitted. The SPA covers approximately 23% of the Borough and the associated 400m buffer zone affects a further 19%.

With regards to land beyond the 400m buffer zone the JSPB Delivery Framework established the principle of Suitable Alternative Natural Greenspace (SANG) provision as a means of avoiding and mitigating impacts. The Surrey Heath SPD then sets out detailed guidance, including that development schemes involving 136 or more net residential units will generally be expected to provide 'bespoke' SANG solutions (although there can be exceptions, particularly in the western urban area).

The Councils SANG Strategy (2020) set out the Council's approach to the provision of SANG, concluding that "*SANG capacity in the west of the Borough is becoming very limited*", and this was a key issue at the Draft Plan stage (2022; see discussion in the Interim SA Report).



However, a significant amount of work was subsequently undertaken to explore options for increasing SANG capacity, as explained within the Thames Basin Heaths Topic Paper (2021), and then most recently the situation has improved significantly, including due to the [purchase](#) of land for a new SANG. See further discussion below.

- Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC) – the study explains: *“Within Surrey Heath the SAC is coincidental with the SPA and it is recognised that the mechanisms outlined above for the Thames Basin Heaths SPA would also serve to protect the underlying SAC. As such... the SAC can be considered to have no notable additional impact upon the availability of land for residential development or the potential capacity of residential sites over and above the... [SPA].”*
- Sites of Special Scientific Interest (SSSIs) – all coincide with the Thames Basin Heaths SPA, with the exception of Basingstoke Canal SSSI. On this basis, the study explains *“the impact of SSSI’s upon the availability or capacity of land to deliver development... is not significantly greater... than the SPA.”*
- Green Belt – the study sets out the national policy context, in respect of Green Belt purposes and the potential to release land from the Green Belt through a Local Plan only in ‘exceptional circumstances’.

It is also important to note that the study was preceded by a Green Belt and Countryside Study (2017), which examined the degree to which all land within the Green Belt *and countryside beyond the Green Belt* contributes to the nationally defined Green Belt purposes. The study concluded: *“... nearly all of the Green Belt and countryside beyond the Green Belt within Surrey Heath fulfils at least two of the purposes of the Green Belt as set out within the [NPPF]... Only 6 Parcels were identified as failing to meet any of the defined Purposes... All of these comprised built-up areas of... Chobham.”*

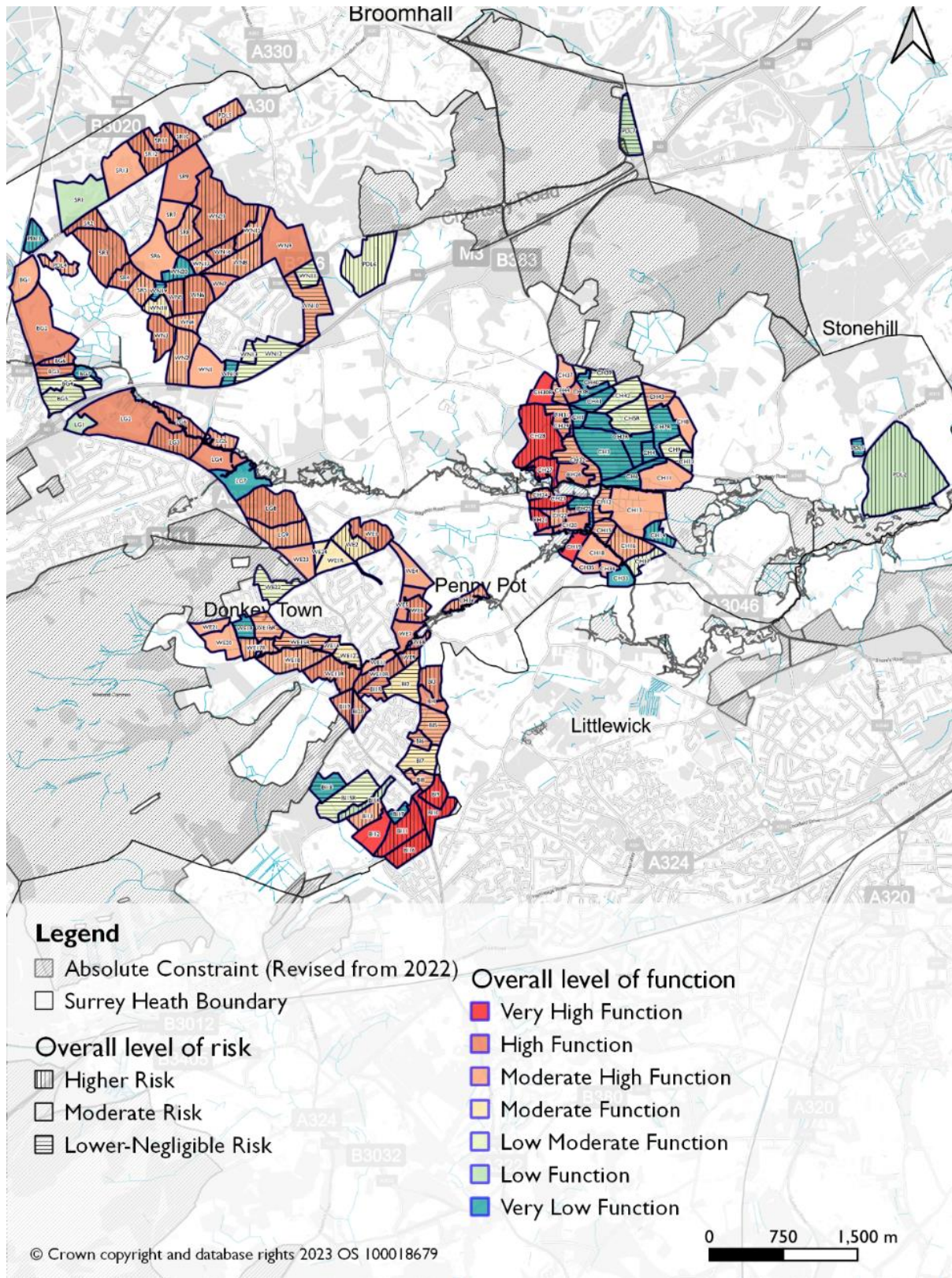
- Other constraints – the Interim Capacity Study explained that flood zone 3b is an absolute constraint to growth within parts of the borough. The Study also discussed the Farnborough Airport Public Safety Zone, although this is no longer considered a constraint following new guidance (DfT, 2021).

- 5.2.30 Overall, the study concluded that *“approximately 45% of land within the borough is affected by policy or environmental constraints which represent an absolute constraint to residential development, with an additional 29% of land (over and above that affected by absolute constraints) designated as Green Belt...”* It is important to note that, in addition to ‘absolute’ constraints’, there are additional constraints that can and should be taken into account when defining growth scenarios. These constraints – for example local biodiversity designations, wider flood risk zones and infrastructure constraint – are explored further below.

#### Subsequent Green Belt work

- 5.2.31 Three subsequent studies have examined the Green Belt:
- **2018** – LUC assessed potential housing sites – both within the Green Belt and within the countryside beyond the Green Belt (CBGB) – in respect of contribution to Green Belt purposes.
  - **2022** – SHBC Officers prepared a study examining detailed landscape parcels (i.e. more detailed than the 2017 study) surrounding settlements (within 400m; not including Woking and Sunningdale). The study also included a focus on identifying previously developed sites in the Green Belt, and notably went a step further than previous work by providing an *overall* assessment of: A) level of Green Belt **function**; and B) level of **risk** to the integrity of the wider Green Belt that would result from release of the parcel.
  - **2024** – the 2022 study was updated to include land within 400m of the TBHSPA, recognising that whilst this land is not suitable for C3 residential it could be suitable for other forms of development.
- 5.2.32 Figure 5.3 summarises findings of the 2024 study. Also, see further maps in **Appendix V**, specifically maps showing ‘function’ and ‘risk’ in turn and also more detailed maps for sub-areas.

Figure 5.3: Summary findings of the Green Belt Review (2024)



### Issues and Options / Preferred Options consultation (2018)

- 5.2.33 At this stage the anticipated plan period was 2016 – 2032, and LHN was understood to be 352 dpa. Having accounted for supply from completions (i.e. sites already built since the start of the plan period), commitments (i.e. sites with planning permission, including 1,200 at Princess Royal Barracks, Deepcut) and windfall (i.e. predicted supply from non-allocated sites), the shortfall to LHN was understood to be 2,739 homes. The proposed approach to meeting this homes shortfall was as follows:
- 612 from four proposed allocations in Camberley Town Centre;
  - 260 from five proposed allocations in settlement areas;
  - 250 from two proposed allocations in the CBGB;
  - 886 from other small to medium sized sites identified in the SLAA as deliverable and developable; and
  - 731 unmet need to be provided for elsewhere within the Housing Market Area (i.e. Hart or Rushmoor).
- 5.2.34 Importantly, the proposal at this stage was to maintain the current extent of the Green Belt, including maintaining Chobham's 'washed over' status. It is also important to note that the consultation document did not discuss the need for a supply buffer over-and-above the housing requirement.
- 5.2.35 The **Interim SA Report** then explored this preferred spatial strategy alongside a 'reasonable alternative' approach involving nil release of land from the CBGB and, in turn, lower growth overall. The appraisal found that this approach performed poorly, relative to the preferred option, in terms of housing objectives, but performed well, relative to the preferred option, in terms of biodiversity and countryside objectives.
- 5.2.36 The **consultation** received 1,273 comments from 387 individuals or organisations. Subsequently, the Council prepared a Consultation Statement, which summarised headline messages received, including:
- Housing requirement / supply – on one hand, a key message was that there should be more consideration of opportunities to meet the full LHN figure in the borough. However, on the other hand, there was a widespread concern that the required number of homes might adversely impact the borough's heathland environment, wider countryside and infrastructure.
  - The plan period – should be amended to span at least 15 years from the point of adoption.
  - Brownfield first – should be a priority.
  - Camberley Town Centre – there was support for development of derelict, redundant and underused sites, and also directing growth here in order to make best use of existing infrastructure.
  - CBGB – one message to come through was that development here should be actively resisted, as this would have a disproportionate impact on the western side of the borough. However, on the other hand, the Consultation Statement records a key message as: *"More efficient use of land in close proximity to settlement boundaries could be utilised for housing development"*.
  - Green Belt – on one hand, a key message was that the Council should undertake a detailed review of Green Belt boundaries, and that greater consideration should be given to the release of Green Belt sites for housing which do not meet the purposes of the Green Belt set out in the NPPF. However, on the other hand, many comments supported maintaining the current extent of Green Belt.
  - Fairoaks Airport – is of strategic importance as both an aviation and employment centre and should not be allocated for housing (N.B. it was not allocated for this use). This option is discussed further below.
- 5.2.37 Specific comments of particular relevance to defining reasonable growth scenarios included:
- Rushmoor Borough – *"... there appears to be very limited testing of reasonable alternatives relating to quantum of development as part of the Sustainability Appraisal. It is recognised that what is considered 'reasonable' will be influenced by the characteristics and constraints affecting development in the Borough. However, as a minimum, it would seem reasonable for an option or option(s) where housing need is met within the Borough, to be tested through the Sustainability Appraisal process."*
  - Woking Borough – *"... supportive of the proposed overall spatial strategy for the Borough which appears to rule out a large scale residential and commercial development at Fairoak[s] Airport. However, it would have been helpful for the Council's defence at this early stage of the plan making process to have also tested potential development at Fairoaks as an alternative option before ruling it out."*

### Employment Land Technical Paper (2020; now superseded)

- 5.2.38 This study sought to update similar studies completed in 2015 and 2016 and aimed to “*consider the supply of and demand for employment land... in Surrey Heath Borough [having] regard to the wider Functional Economic Area (FEA).*” The study has now been superseded by a study completed in 2023, as discussed below, and it should be noted that subsequent work has focused on needs and supply in Surrey Heath only, as other authorities in the FEA did not need to update their evidence base at the time.
- 5.2.39 A key aim of all employment land work in Surrey Heath (2015, 2016, 2020, 2023) is to inform relevant policies for protecting existing employment space from loss and signalling support for increased land / floorspace in suitable locations, including beyond existing employment land designations.
- 5.2.40 A headline conclusion of the 2020 study was that, without new employment land allocation, the supply / demand balance over the plan period would be “*marginal... particularly in respect of office accommodation.*” However, matters have now moved on, as set out in the latest study (2023; see below).
- 5.2.41 Importantly, the 2020 study explained: “*the forecasts used to determine future jobs growth and the required amount of employment land to support this are based on projections that were produced prior to the global COVID-19 pandemic.*” In this regard, it should be noted that the 2023 study uses up-to-date forecasts.

### Addressing Climate Change through the Surrey Heath Local Plan (2020)

- 5.2.42 This report considers climate change mitigation and adaptation in turn, in both cases exploring three key questions: 1) What is the context? 2) What is the baseline scenario? 3) What are the intervention options feasibly open to the Council (with a focus on interventions reasonably within the scope of the Local Plan)?
- 5.2.43 This study was an input to the Draft Plan (2022), and a detailed review was presented in Section 5.2 of the Interim SA Report. However, the study is now somewhat dated, as this is a fast-moving policy area. Climate change matters were a key focus of the Interim SA Report in 2022, and new evidence in respect of the key issues and opportunities for local plan-making is constantly emerging. Matters are discussed further below, including with reference to the Local Plan Viability Assessment (2024).

### Town centre uses and future directions study (2021)

- 5.2.44 This is a study that remains broadly up-to-date, albeit there has been ongoing work over the course of 2023 and 2024 to explore development viability and deliverability in Camberley town centre.
- 5.2.45 The context to the study included:
- “*... the dynamic trends influencing and shaping the retail and leisure sectors. Together these policies and trends are generating significant challenges and opportunities for our high streets and town centres.*”
  - Camberley has benefitted from significant new investment over recent years (since the Town Centre AAP, 2014), and is set to further benefit from the regeneration and repurposing of some key strategic sites/buildings in the town centre over the short to medium term. Key locations discussed are:
    - London Road – the majority of this key northern gateway site to the town centre is owned by the Council. It represents the largest regeneration opportunity in the town centre for new residential and mixed-use development, along with the provision of high quality public realm.
    - The High Street, Princess Way and Knoll Walk - the Council and the Enterprise M3 LEP have jointly invested some £4.4m in public realm works, which were completed in early 2021.
    - Ashwood House / Pembroke House - the Council has led the circa £30m redevelopment of these former office blocks which are identified as key opportunities by the AAP.
    - The Square - SHBC acquired the shopping centre in 2016 and has since invested in the refurbishment.
    - Arena Leisure Centre – located on the edge of the town centre, the new centre opened in July 2021.
- 5.2.46 A headline conclusion of the study is that: “*The forecasts for both convenience and comparison goods show **no** Borough-wide [need] for new retail floorspace over the forecast period, up to 2038; after taking account of new retail commitments and the potential to reoccupy/repurpose vacant space.*”
- 5.2.47 On this basis, the study recommends:

*“... concentrating, consolidating and, in some cases, repurposing the town centre’s existing retail offer. We therefore advise the Council to review its strategy for retail expansion, and instead focus the [Primary Shopping Area, PSA] on the blocks comprising...”*

*“... Notwithstanding the contraction of the PSA, we consider that the existing definition and extent of the Town Centre Boundary is still appropriate.”*

5.2.48 Other headline findings of the study include:

- “Notwithstanding the damaging impacts of the pandemic, it has also created potential opportunities for Camberley Town Centre to capitalise on. For example, the increase in home working has generally benefitted commuter towns, local centres and essential shops at the expense of larger cities and towns; and has also reinforced the concept of the walkable and liveable 10-15 minute neighbourhood. Camberley (and Frimley and Bagshot District Centres) should be well placed to build on this trend towards home working, which should in turn increase the demand for more flexible workspace...”
- “Fundamental to the transition to more diverse uses that go “beyond retail” will be the provision of a mix of new homes and apartments in centres to help boost their ‘captive’ resident and working catchment populations in the most sustainable way, and to help further support new uses... The regeneration of the [Camberley] London Road site and the redevelopment/repurposing of buildings across the town centre (e.g. Ashwood House) will go some way to introducing new, high quality and diverse housing into the town centre that is affordable to all ages and income groups. However, it is also important that the right balance is achieved between providing the right mix and right type of new residential uses in the right locations, whilst maintaining the critical retail, leisure, workspace and other uses that are vital to support the growing population and maintain the town’s overall vitality and viability... Article 4 directions could potentially be used to help to protect the integrity, role and function of the [“essential core”]...”
- “Camberley Town Centre is probably better positioned than most centres to grow and flourish over the next decade and beyond. It has many assets, strengths and opportunities upon which to build the next phase of its recovery, regeneration and renaissance; although this will clearly need to look “beyond retail” as the answer to the challenges it is facing and will face. The Council also has a key stake in the town centre through its ownerships and partnerships, and is therefore well placed to proactively develop, manage and curate the town’s offer, and exploit new investment opportunities and funding.”

#### Draft Plan consultation (2022)

5.2.49 Beginning with the Interim SA Report (2022; also its non-technical summary), the centrepiece was an appraisal of three reasonable alternative growth scenarios, namely:

- Scenario 1 – the preferred strategy (essentially in the form of the preferred key diagram), which importantly did not involve any Green Belt release (aside from the proposal to inset Chobham);
- Scenario 2 – the preferred strategy plus an additional ~800 homes at some or all of a shortlist of 18 small / modest scale Green Belt sites; and
- Scenario 3 – the preferred strategy plus an additional ~1,000 homes at Fairoaks Garden Village.

5.2.50 The preferred scenario was **Scenario 1**, which the appraisal found to perform well in terms of the majority of sustainability objectives (or on a par with one or both of the other scenarios), but relatively poorly in terms of sustainability objectives relating to “communities” and “housing” (when judged against at least one of the two other scenarios), with the appraisal favouring higher growth in these respects.

5.2.51 The Interim SA report drew an important conclusion in respect of **Scenario 2**, as follows:

*“With regards to Scenario 2, the appraisal finds this scenario to perform relatively poorly in terms of all sustainability topics, which is a strong indication of poor performance overall. However, it is important to note that this scenario is defined in somewhat high level terms. In practice, in the event that exceptional circumstances were identified to warrant Green Belt release, it could transpire that fewer than 800 homes are required to be delivered at smaller Green Belt sites, and further detailed work might serve to identify sites that perform relatively well in terms of certain sustainability topics. For example, one or two of the potential sites have a degree of merit in transport terms. However, under any scenario it would likely remain the case that all of the sites in contention for allocation are of a modest scale such that they would be unlikely to deliver significant ‘planning gain’ over-and-above new homes (to include family homes with gardens). It also seems likely that, under any scenario, there would be pressure to allocate in flood zone 2 and in close proximity to the TBHSPA 400m buffer.”*

5.2.52 It is not possible to rule-out Scenario 2, or a newly defined growth scenario akin to Scenario 2 (i.e. a scenario involving support for one or more modest Green Belt sites), simply on the basis of the above conclusion from the Interim SA Report. However, taking this conclusion into account alongside consultation responses received and also latest evidence / understanding does serve to suggest a strong argument for now ruling out Scenario 2, or a growth scenario akin to Scenario 2. Matters are considered further in Section 5.4, but further specific ‘strategic factors’ for consideration here include:

- Consultation responses – as set out below, through the consultation there was no clear support for higher growth and/or Green Belt release from key stakeholder organisations (as opposed to the promoters of individual omission sites, as discussed in Section 5.4).
- National context – since the time of the Draft Plan (2022) there has been considerable national discussion around protecting Green Belt through local plans, including following a letter from the Secretary of State, Michael Gove MP, to all local authorities in England dated 5<sup>th</sup> December 2022, which explained: “*Green Belt: further clarifying our approach to date in the National Planning Policy Framework and the Localism Act, we will be clear that local planning authorities are not expected to review the Green Belt to deliver housing. This is in line with commitments made by the Prime Minister in the Summer.*” Subsequently, the new NPPF was published in December 2023, with new text (para 145) setting out that “*there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated.*” The new wording serves to further clarify the high evidential bar in respect of demonstrating ‘exceptional circumstances’.
- Gypsy, Traveller and Travelling Showpeople accommodation needs – locally are pressing (see further discussion below), which is a reason to remain open to allocation of housing-led sites that demonstrate deliverability of a significant number of pitches / plots. However, a key point to note is that none of the promoters of the Green belt omission sites that featured in Scenario 2, as appraised in the ISA Report (2022), submitted a consultation response proposing to deliver new pitches or plots through the Draft Plan consultation. This is despite the appraisal of growth scenarios giving clear ‘credit’ to Scenario 3 (which involved allocation of Fairoaks Airport) on the basis that the scheme would deliver new pitches.

Indeed, of the 18 Green Belt urban extension sites shortlisted as part of Scenario 2 in 2022, 11 have a theoretical capacity over 100 homes (assuming 30 dph), such that they could potentially be suited to delivering pitches or (less likely) plots, and of these only four sites submitted any response to the consultation at all. Furthermore, of the four responses, only one suggested a capacity significantly above 100 homes (specifically 135 homes). Looking at the six notably larger sites (with theoretically greater potential to accommodate pitches or plots), only two submitted a response to the consultation, with one suggesting a capacity of 100 homes and the other unclear on capacity.

Furthermore, none of the site promoters in question submitted a response to the dedicated consultation on Gypsy, Traveller and Travelling Showpeople accommodation needs held in summer 2022.

This is not to say that none of the Green Belt omission sites from the Draft Plan stage (aside from Fairoaks Airport) could feasibly deliver pitches or plots. However, there is clear evidence to suggest that this is not a deliverable option to pursue further for the purposes of the current Local Plan.

- Benefits of Green Belt release beyond housing – as discussed, few submissions were received from ‘Scenario 2’ Green Belt omission site promoters through the Draft Plan consultation in 2022. Of those that were received, none sought to place significant emphasis on delivering benefits beyond meeting housing (including affordable housing) needs. The largest scheme promoted would involve just 135 homes, which is far short of the scale of growth needed to deliver a primary school, for example.

5.2.53 Finally, the following bullet points aim to present some **key messages from consultation responses** of relevance to the task of defining reasonable alternative growth scenarios at the current stage:

- **Statutory environmental consultees** – there were no comments received on the preferred growth scenario / spatial strategy, nor the reasonable alternatives considered within the Interim SA Report. The Environment Agency commented on flood risk affecting one site with planning permission.
- **Other statutory consultees** - Thames Water explained: “*On the information available to date, Thames Water do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to a majority of the proposed site allocations...*”
- **Other national organisations** – the only other such organisation to comment was the Home Builders Federation. Issues raised included: the plan period (there is a call for the plan period to extend to 2040);

housing need (the suggestion is that account should be taken of the uncapped standard method figure); and the size of the supply buffer over-and-above the housing requirement (10 - 20% is suggested).

- **Neighbouring local authorities** – the majority of neighbouring authorities commented on Policy SS1, but not all. A common theme was support for meeting housing need in full (after having accounted for supply from Hart). Runnymede BC also stated support for meeting employment land needs in full.
- **Hart (housing market area)** – Hart District objected to discussion of a Housing Market Area (HMA) covering Surrey Heath, Rushmoor and Hart. Hart DC are of the view that “*national policy has moved on, and that the [HMA] is an outdated concept based on old evidence that has not been updated.*”
- **Parish Councils** – a number of Parish Councils commented on Policy SS1. For example, Windlesham Parish Council discussed the varying issues across Bagshot, Lightwater and Windlesham; and also noted the proximity of Longcross Garden Village (in Runnymede BC). Chobham Parish Council also questioned the decision to inset Chobham from the Green Belt, for example stating: “*It is difficult to make a fully informed comment without understanding the full exceptional circumstances justifying the change. It is felt that a more in-depth and fine grain consideration of the village boundary would be appropriate...*” The response did not reference the appraisal of reasonable alternatives in the Interim SA Report.

It is also notable that the level of growth directed to Windlesham was questioned by the Windlesham Society. However, the response did not fully acknowledge the distinction between committed and non-committed sites. At the time of the consultation, of the 173 new homes projected to be delivered within Windlesham over the plan period, 137 homes already benefit from planning permission; and, of the 36 homes without planning permission, the majority are directed to a long-standing housing reserve site.

- **All-Party Parliamentary Group (Airfields Working Group)** – has a national perspective, but a site-specific interest in Fairoaks within the borough. In short, the Group seeks “*a long-term commitment to maintain Fairoaks as a thriving and busy airport*”, including because “*the retention of airfields such as Fairoaks is essential to provide land and infrastructure to support new technological advancements.*”
- **Fairoaks** – the new settlement promoter submitted a detailed response, which serves as important evidence. One point to note here is the suggestion that Fairoaks might be defined within the plan as a ‘broad location for development’ (NPPF paragraph 68). One other issue raised that warrants discussion here is SANG capacity in the west of the borough. The Fairoaks site promoters called this into question, but without reference to the evidence set out within the Thames Basin Heaths SPA Topic Paper, plus it is important to say that the situation has now improved significantly, as discussed above. Also, it is important to be clear that SANG at Fairoaks would not mitigate development in the west of the borough.
- **Site promoters** – the great majority of comments on the spatial strategy (Policy SS1) were received from site promoters seeking allocation of a boost to a proposed allocation. Common themes included: calls for a longer plan period; calls for an increase to the proposed level/rate of housing growth across the plan period; and questions raised regarding elements of the proposed supply (i.e. calls to reduce the assumed number of homes at certain proposed allocations, leading to a need to find additional supply). On the latter point, one promoter notably commented:
 

“*A number of constraints relating to Camberley Town Centre sites are identified including relocation of existing uses; funding; disposal of civic infrastructure; delivery times; costs; limited mix of dwellings; infrastructure and lack of masterplanning. Delivery on Mindenhurst has been slow and demonstrates the danger of overreliance on large sites.*” In this regard, it should be noted that detailed work has been ongoing, as discussed further below.
- Another issue raised by a number of omission site promoters was older persons accommodation, including ‘extra care’ accommodation, which typically falls between C3 and C2 depending on the level of extra care provided. Supply of older persons accommodation has been given further consideration since 2022, as discussed further below, including in light of the discussion of need in the LHNA (2024).

#### Latest context

- 5.2.54 This is the final section presenting a discussion of ‘broad distribution’ factors (issues and options) of relevance to the task of defining reasonable alternative growth scenarios.
- 5.2.55 The equivalent section within the Interim SA Report (2022) presented a discussion focused on exploring the implications of: the national response to the **Covid-19** pandemic; the **Environment Act** (including its focus on Biodiversity Net Gain; BNG); and latest evidence in respect of key **decarbonisation** issues / opportunities for local plan-making. These all remain key issues with a bearing on growth scenarios.

5.2.56 The following bullet point cover topics that have been a focus of work/updates since 2022:

- **Providing for Gypsies, Travellers and Travelling Showpeople needs** – a dedicated consultation was held in late summer 2022, supported by an Interim SA Report. The preferred approach at the time was to allocate four sites; however, subsequent feasibility work has served to narrow this list considerably (as discussed in Box 5.2, below). As well as a worsened supply position, it is also the case that understanding of need for those meeting the planning definition has increased since 2022. Specifically, following changes to the national ‘planning definition’ of Gypsies and Travellers whose need for pitches should be provided for, the borough need figure increased from 32 pitches to 35 pitches (plus there is a need for Travelling Showpeople Plots, which is understood to be unchanged since 2022).
- **Surrey Local Transport Plan (LTP) 4** – another significant development since the Draft Plan consultation is adoption of Surrey LTP4 in July 2022. The aim is “to significantly reduce carbon emissions from transport to meet our commitment to net zero emissions by 2050” and the objectives are: Net zero carbon emissions; Sustainable growth; Well-connected communities; and Clean air and excellent quality of life. These objectives are then supported by three principles: Avoid unnecessary travel by reducing the number and length of trips needed, through improving planning for homes and employment sites, travel planning and levels of digital connectivity; Shift travel choices to more sustainable modes of transport, including public transport, walking and cycling, away from car use; and Improve the energy efficiency of vehicles and operational efficiency of roads through technology.

A concise list of key interventions is presented [here](#), with those of particular relevance including: safer and improved walking and cycling routes; neighbourhoods designed for access to shops, services and facilities; more buses, including new on-demand services; better rural connections; solutions to reduce bottlenecks (congestion and air quality); and support for those with accessibility needs.

- **Highways assessment** – work was first undertaken in 2023 to model transport movements and traffic under the Draft Plan (2022) preferred scenario plus a higher growth scenario involving additionally allocating Fairoaks Airport. In summary, the study demonstrates there is unlikely to be any significant impacts on the road network arising from the preferred scenario, and some notable concerns with regards to the higher growth scenario involving Fairoaks Airport. The study is discussed further below.
- **Local Cycling and Walking Infrastructure Plan (LCWIP)** – [Phase 1](#) has now been completed, which involved preparation of a network plan to identify key walking and cycling corridors and initial high level concept proposals. Phase 2 will then involve preparation of detailed feasibility studies. The outcome of Phase 1 is the identification of 20 aspirational cycle corridors and 11 ‘core walking zones’ and, of the 20 cycle corridors, a number are prioritised. These are discussed further below, in Section 5.4.
- **Employment land** – the updated Employment Land Technical Paper (2023) is an update to the 2020 position. It concludes that there are increased needs for employment floorspace (against the 2019 baseline), with a generally increased need for industrial and logistics uses, coupled with possible needs for additional office floorspace, although there is low confidence in the forecast for office needs.

The study also draws important conclusions on warehousing: “*Surrey Heath also accommodates three M3 junctions, which could theoretically provide for large sub-regional logistics demand but these investments could be located in a number of areas and would be a policy choice to release additional land for such development.*” Similarly, the study explains film studios as an important ‘footloose’ industry.

The Council also commissioned an Employment Land Supply Assessment (2023), which identifies a range of vacant and underutilised land and buildings within designated employment sites and these present opportunities for development and redevelopment including intensification, such that new employment floorspace is delivered that contributes to the identified need.

Most recently, the evidence base has been updated further, following an approval (with reserved matters) for a substantial scale of redevelopment of underutilised office space at Watchmoor Park, into industrial and/or logistics uses. The updated figures on employment land needs and potential supply are set out in the Employment topic paper and summarised later in this report (see Box 5.2).

- **New NPPF (2023)** – implications for understanding of Green Belt as a constraint have already been discussed above. Furthermore, there is a new emphasis on accounting for local constraints. This is understood from a 6<sup>th</sup> December 2022 Ministerial statement, which discussed accounting for “local constraints” and “character” (and, in respect of character, an accompanying letter sent to local authorities notably explained: “*While more homes are needed in many existing urban areas, we must pursue ‘gentle densities’...*”). Within the new NPPF there is new text on accounting character at para 130, and changes to para 61 seek to clarify the potential to account for constraints when setting the housing requirement.



- **Local Plan Viability Assessment (2024)** – this is an important consideration for spatial strategy and site selection, as viability does vary across the borough. Matters are discussed further in Section 5.4, but a key point to note is that viability is challenging at the two main Camberley town centre allocations (London Road Block; and Land East of Knoll Road), with implications for the potential to deliver affordable housing. Also, the study explains that there may be a need for some “minor flexibility”, in respect of affordable housing, at other brownfield allocations in the western urban area in order to ensure scheme viability. As well as affordable housing, there could also be implications for wider policy ‘asks’, most notably net zero development. Also, the study explains: *“For this report, [Community Infrastructure Levy, CIL] has been included at the current rate. The potential headroom for collection of further CIL is mixed dependent upon viability, although some typologies have headroom for significant increases.”*
- **Biodiversity Net Gain (BNG)** – the Council has undertaken a range of work to evidence and ultimately justify taking an ambitious approach to BNG. This has included examining the habitats that would be impacted at the emerging proposed development sites, and the potential to deliver compensatory biodiversity credits through habitat creation and enhancement at Windlemere SANG. However, it is difficult to suggest significant implications for growth scenarios, e.g. to suggest that a higher growth scenario could make it more challenging to achieve an ambitious approach to BNG. Further context will be provided in 2025 when the Surrey Local Nature Recovery Strategy (LNRS) is due to be published.

#### Conclusion on broad distribution issues/options

5.2.57 The bullet points summarise key messages in respect of ‘broad distribution’ factors (issues and options) relevant to the task of defining reasonable alternative growth scenarios. The discussion is mostly unchanged from that that presented in the Interim SA Report (2022), with significant changes underlined.

5.2.58 On the basis of the discussion above, the following key messages emerge:

- There are clear arguments for directing housing growth to **Camberley town centre**, both from a perspective of reducing pressure on the Green Belt and countryside beyond the Green Belt (CBGB), but also from a perspective of realising town centre regeneration and decarbonisation opportunities.
- The second sequentially preferable location for growth is clearly the **wider urban area**, in the west of the borough, and other urban areas (villages), because directing growth here will serve to reduce pressure on the Green Belt and CBGB. No headline strategic opportunities emerge from the discussion above; however, local-level opportunities exist, and are discussed further below in Section 5.4.
- With regards to both Camberley town centre and the wider urban area there is a need to carefully consider delivery timescales / risks and viability challenges. There is also a need to balance a need to maximise supply from the urban area with a need to avoid undue change to character in urban areas. Outside of Camberley town centre the largest allocation in 2022 was Sir William Siemens Square, Frimley, where there is now a pending planning application for a 170 home residential-only scheme.
- The third sequentially preferable location for growth is the **CBGB**, with a view to minimising pressure on the Green Belt. There is also a strategic opportunity, in that the CBGB is generally well-connected to the main urban area. However, on the other hand, there is a need to consider the value and sensitivity of the CBGB, both from an environmental perspective, notably given proximity/links to the TBHSPA, and from a ‘communities’ perspective, in that the countryside here will tend to be accessible or otherwise valued by residents of the western urban area. A key point to note is that much of the CBGB outside of the TBHSPA buffer is locally designated as a Site of Importance for Nature Conservation (SNCI) or subject to clear historic environment constraint.
- The least sequentially preferable broad location for growth in the borough (aside from areas subject to absolute constraints) is the **Green Belt**, where there is a need to demonstrate (i.e. evidence and justify) exceptional circumstances, accounting for the degree to which the land in question makes a contribution to the defined Green Belt purposes and the need to promote *“sustainable patterns of development”* (NPPF para 147). When considering ‘sustainable patterns of development’ there can be the potential to take account of wide ranging-factors (e.g. ‘planning gain’ in terms of provision of community infrastructure to meet a need); however, the NPPF emphasises that: *“plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.”*

These factors informed a decision in 2021/2022 to undertake Green Belt review and then explore two growth scenarios involving Green Belt release. However, one of the two scenarios involving Green Belt release from 2022 is now, in 2024, considered to perform poorly, in light of the discussion presented above. Specifically, in light of the discussion above, there is now considered to be limited support for Scenario 2 from 2022, or any scenario akin to it, i.e. any scenario involving one or more small to medium sized Green Belt urban extensions. However, a final conclusion in this regard can only be reached after having given consideration to site options (Section 5.3) and settlement scenarios (Section 5.4).

The following text taken from Section 5.2 of the Interim SA Report (2022) is also worth repeating:

*“The Green Belt / edge of Green Belt (Bagshot) settlements are subject to a range of non-Green Belt constraints, including in respect of: TBHSPA proximity, most notably land to the west of Bagshot, West End and Bisley, and land to the north of Chobham; flood risk and sensitive river valley environments (landscape, heritage, access, water quality), including Chobham and land between West End and Bisley; the historic environment, including at Chobham and (land to the west of) Windlesham, but also with valued assets, clusters of assets and historic landscapes elsewhere; transport connectivity, for example, Chobham and Windlesham have relatively poor bus connectivity; and road infrastructure, e.g. the A319/A3046 junction within Chobham village centre conservation area is sensitive, and another clear consideration is use of the M3 for local journeys. There are no clear and obvious strategic growth opportunities, but potentially some that might be explored further, e.g. in respect of access to a primary school and strategic planning for green and blue infrastructure.”*

- With regards to Scenario 3 from 2022, which involved non-Green Belt supply plus Green Belt release to support the allocation of **Fairoaks**, on balance there is a strategic case to suggest that this remains a reasonable scenario for consideration at the current time (again, subject to further discussion below).

The appraisal completed in 2022 showed Scenario 3 to have considerable merit in certain respects (albeit also considerable drawbacks), and appraisal findings from 2022 still broadly hold true at the current time. New evidence is available in respect of transport constraints to a new settlement at Fairoaks; however, latest evidence/understanding in respect of meeting Gypsy and Traveller accommodation needs serves as a consideration in favour of continuing to remain open to the option.

- Aside from Fairoaks, the equivalent discussion within Section 5.2 of the Interim SA Report sought to highlight the benefits of supporting **strategic growth locations** more generally. However, at this stage in the process it is clear that new strategic growth opportunities in Surrey Heath are limited to Camberley town centre and Fairoaks (also see discussion of Land at Pine Ridge Golf Course in Section 5.3).
- Regardless of whether there is support for one or more strategic sites, there is a need to support **a mix of site types and a degree of dispersal** (mindful of the settlement hierarchy) in order to ensure a robust housing supply trajectory (i.e. minimise delivery risk) and meet specific housing needs.
- There is also a need to consider sites suited to meeting **wider needs**, including for employment land, Gypsy and Traveller and Travelling Show People pitches/plots and specialist housing.

Focusing on Gypsy and Traveller and Travelling Show People accommodation needs, work has been ongoing since 2022, and it is clear that the situation remains challenging. In turn, this is a factor in support of exploring a higher growth scenario involving one or more additional housing-led sites that could deliver new additional (Gypsies and Travellers) and/or plots (Travelling Showpeople).

- Work has also been ongoing in respect of **other factors** with a bearing on broad distribution, including:
  - Highways – an assessment in 2022 flagged limited concerns with the emerging strategy.
  - Walking/cycling infrastructure – recent work on an LCWIP highlights priority corridors for investment.
  - SANG capacity – the situation in respect of capacity in the west of the borough has notably improved.
  - Development viability – varies significantly across the borough / between options. There is a case for directing growth to areas with strong viability to secure affordable housing and net zero development.
  - Biodiversity net gain – although it is difficult to suggest strong implications for growth scenarios.

5.2.59 There are also wide-ranging other strategic spatial factors that can and should feed-in, including all of the growth-related issues and opportunities that were a focus of the appraisal presented within the Interim SA Report (2022). However, the above list is considered to provide a useful ‘top-down’ input into the process of defining reasonable growth scenarios. The next step is to explore site options as a ‘bottom up’ input.

## 5.3 Site options

- 5.3.1 The primary mechanism for considering site options is the Strategic Land Availability Assessment (SLAA). The current SLAA is dated 2023 (published 2024), whilst the previous SLAA was dated 2022 (published in 2023) and the one prior to that was dated 2021 (published alongside the Draft Plan in 2022).
- 5.3.2 The 2023 SLAA assesses a total of 112 sites identified through: a Call for Sites; targeted correspondence with landowners (including as informed by the Countryside Capacity Study, 2020) the Draft Plan consultation. Camberley Town Centre-focused workstreams are another important input.
- 5.3.3 In line with NPPF paragraph 69, the SLAA categorises all (non-permitted) site options as follows:
- Deliverable (able to deliver in the first five years of the plan period, at least in part) – a total of 9 site options are identified as deliverable, with a total identified capacity of 231 homes.
  - Developable (only able to deliver in the latter years of the plan period) – a total of 41 site options are identified as deliverable, with a total identified capacity of 1,809 homes.
  - Discounted – 61 sites that are judged not to be deliverable or developable.
    - One of the discounted sites warrants special consideration – see Box 5.1.
- 5.3.4 With regards to the **deliverable and developable sites**, there is limited need to scrutinise the conclusions of the SLAA through the appraisal of reasonable growth scenarios. This was the view taken in 2022 (see Section 5.3 of the Interim SA Report), and that view is strengthened in light of the Draft Plan consultation. As per 2022, none of these sites would involve Green Belt release and changes made to the conclusions on deliverable / developable sites, since the Draft Plan stage, are overall considered to be quite modest.
- 5.3.5 Changes made are a focus of discussion in Section 5.4. However, the key message here is that there is limited strategic argument for treating supply from SLAA deliverable and developable sites as a 'variable' across the reasonable alternative growth scenarios. In particular, SLAA conclusions in respect of overall site suitability are considered to be quite firmly justified, given few objections received through the Draft Plan consultation in 2022. Additionally, there is a need to consider the question of how many homes will be delivered (mindful of other onsite uses), when homes will be delivered and delivery risks.
- 5.3.6 All of these matters are discussed in Section 5.4, before reaching a final conclusion on whether to treat supply from SLAA deliverable and developable sites as a 'constant' or a 'variable' across the reasonable alternative growth scenarios. Clearly, a decision to explore the option of reduced supply from deliverable and developable sites would necessitate either lower growth overall or reliance on discounted sites.
- 5.3.7 With regards to **discounted sites**, 27 of these are discounted on account of being located within the Green Belt, and one such site (Site 890, Fairoaks Airport) stands out as a strategic (new settlement) option. Discounted Green Belt sites were closely scrutinised in 2021/2022, and 18 select sites were taken forward to the reasonable alternative growth scenarios (Scenario 2). However, as discussed in Section 5.2, there is now a clear distinction between: A) Fairoaks, which warrants ongoing close scrutiny; and B) other sites, for which there is now reduced strategic argument for allocation (in comparison to 2021/2022). Nonetheless, all discounted Green Belt sites are discussed in turn in Section 5.4.
- 5.3.8 With regards to discounted sites outside of the Green Belt, these are predominantly discounted on the basis of availability concerns or clear suitability concerns, such as location within the 400m TBHSPA buffer zone. However, several sites do warrant consideration within Section 5.4, including sites previously (2021 SLAA / Draft Local Plan and/or 2022 SLAA) identified as deliverable / developable. Also, as discussed above, Land at Pine Ridge Golf Course requires special consideration – see Box 5.1.
- 5.3.9 Finally, as a means of providing supplementary evidence on site options, **Appendix VI** presents the findings of an AECOM-led quantitative GIS-based exercise, involving examining the spatial relationship between all site options and a range of constraint/push (e.g. biodiversity designations) and opportunity/pull (e.g. schools) features for which data is available in digitally mapped form for the borough as a whole.
- 5.3.10 The limited nature of the analysis is such that it does not enable overall conclusions to be reached on the merits of each site (unlike the SLAA); however, it is nonetheless a useful input to Section 5.4. Also, it should be noted that this analysis is *as per* that presented in the Interim SA Report (2022), i.e. the GIS analysis has *not* been updated. This approach was considered proportionate, given the clear limitations of the analysis and, in turn, its limited role in the overall process (of defining reasonable growth scenarios).

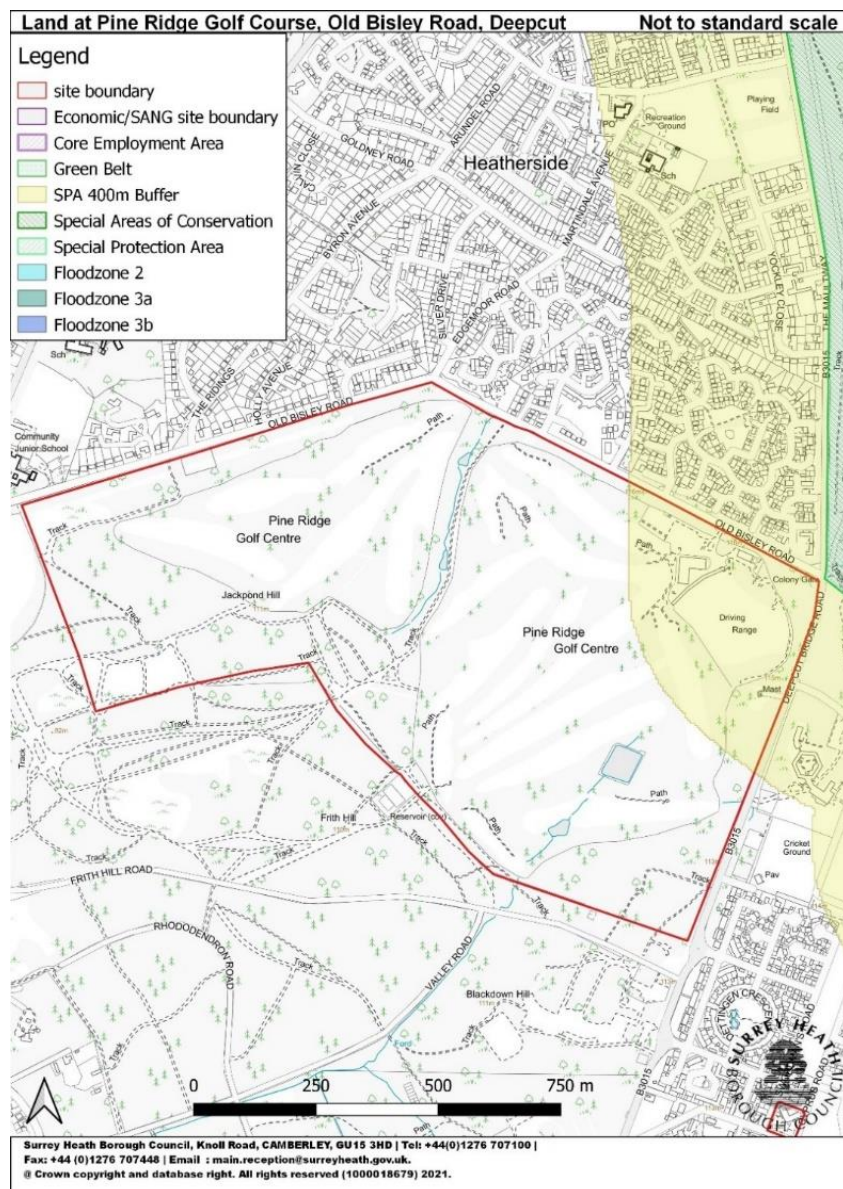
**Box 5.1: Discussion of Land at Pine Ridge Golf Course**

Land at Pine Ridge Golf Course (Site ID: 830) (also known as the Frimley Fuel Allotments) is located in the Countryside beyond the Green Belt, south of Old Bisley Road, comprising the Pine Ridge Golf Course and surrounding woodland. The site forms part of an extensive area of pine woodland, which strongly contributes to the local distinctiveness of the area, and which provides the setting of Deepcut. The site is wholly within a Woodland Tree Protection Order and the eastern extent of the site is within the SPA 400m buffer zone.

A large site covering the entirety of the golf course and the majority of the wider Frimley Fuel Allotments was submitted, by a developer, as part of the Call for Sites 2020/21 and included proposals for up to 900 homes and a Bespoke SANG, supported by a Vision Document. However, the site was discounted in the SLAA 2021 as a result of the freehold owner (Trustees of Frimley Fuel Allotments) confirming that the site was not available.

Subsequently, the freehold owner confirmed a commitment to exploring options for future development for a range of uses on the land. However, this commitment is broad brush, such that the Council considers that the threshold to enable a conclusion that the site is developable has not been met. As such, it was discounted within the SLAA 2022 and **remains discounted** within the SLAA 2023.

Nonetheless, it clearly remains an area of search. There are significant constraints affecting the site, for example the Landscape Sensitivity Assessment (2021) flags this area as having high sensitivity (see Appendix II). However, there would be potential for a strategic scale scheme (with associated benefits, e.g. in terms of infrastructure), and its location within the Countryside beyond the Green Belt, and adjacent to the main urban area, serves to indicate that the option of growth here would be sequentially preferable to Green Belt release.

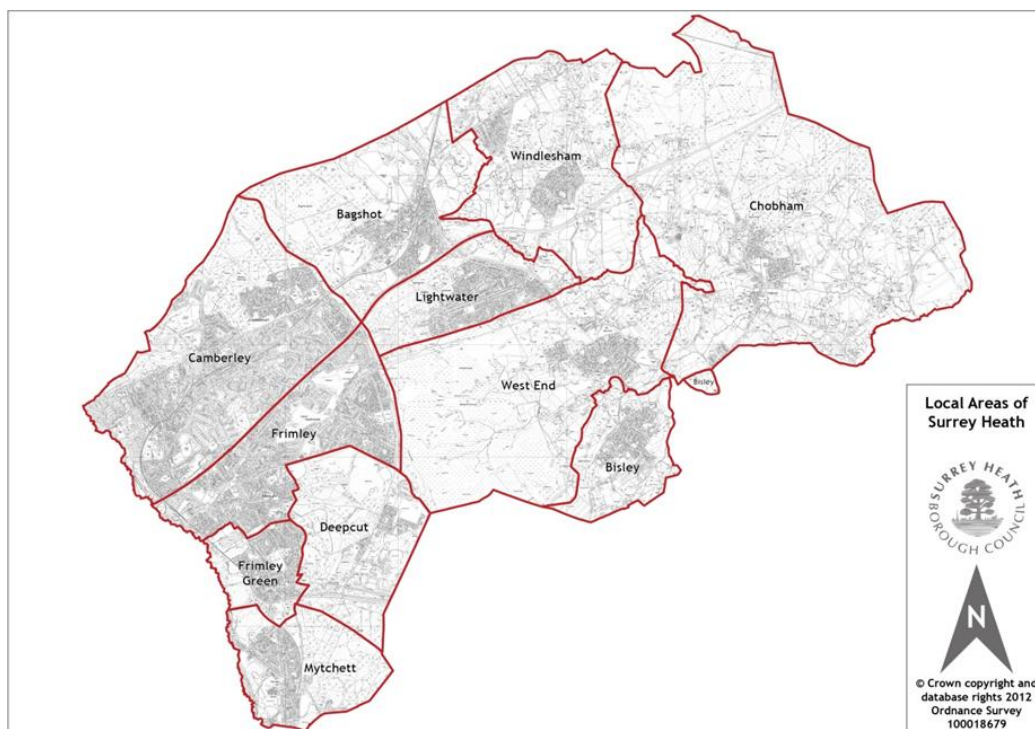


## 5.4 Sub-area scenarios

### Introduction

- 5.4.1 Discussion has so far focused on A) 'top down' considerations in respect of growth quantum and broad distribution; and B) 'bottom-up' consideration of site options. The next step is to consider each of the borough's sub-areas in turn, exploring how sites might be allocated/supported in combination.
- 5.4.2 There are eleven quite well-established sub-areas within the borough – see Figure 5.4.

**Figure 5.4:** Borough sub-areas



### Structure of this section

- 5.4.3 The sub-areas are discussed in alphabetical order, with each discussion structured under four headings:
- Completions and commitments – i.e. homes delivered since the start of the plan period or set to come forward at sites with planning permission.
  - 'SLAA sites' – the aim is to briefly discuss sites identified by the SLAA as deliverable or developable (otherwise known as sites identified as 'realistic candidates for development' in the SLAA). In some cases suitability can be questioned; however, more often the key question is around delivery assumptions, i.e. whether the site is 'deliverable' (years 1 to 5) or 'developable' (latter years of the plan).
  - Discounted sites – the aim is to identify sites discounted by the SLAA that warrant being taken forward to Section 5.5 and, in turn, detailed consideration through appraisal of reasonable growth scenarios. Important context in respect of Green Belt options comes from the discussion in Section 5.2, above.
  - Conclusion – the aim is to conclude on sub-area scenarios to progress to Section 5.5.

### A note on methodology

- 5.4.4 The aim here is not to present an appraisal of reasonable alternatives, but rather to discuss options/scenarios as a means to an end, namely definition of borough-wide reasonable alternative growth scenarios (Section 5.5). In turn, the discussions are systematic (see above), but discretion and planning judgment is applied. This approach is taken mindful of the fundamental legal requirement, which is to explain reasons for arriving at reasonable alternatives (see definition in Section 4) in "outline" terms.

## Bagshot

### Completions and commitments

5.4.5 There have been 196 completions since the start of the plan period, and 122 homes have permission.

### SLAA sites

5.4.6 The SLAA identifies eight sites with a total capacity of **112** homes.

5.4.7 The largest site is **Site 247** (Bagshot Depot and Archaeology Centre; 50 homes), which is in public sector ownership, comprises PDL within the settlement boundary and benefits from excellent proximity to a rail station. There are challenges relating to the historic environment (including an onsite locally listed building) and the two adjacent a-roads (including the dual carriageway A322), plus further work is required to confirm access arrangements and there is a need to relocate the existing operational depot onsite. However, these are deliverability challenges more so than suitability issues, and are reflected in an assumption that the site will deliver in years 6-10 of the plan period.

5.4.8 On balance, this site can reasonably be progressed to Section 5.5 as a site that should feature as an allocation for 50 homes across all the reasonable growth scenarios (i.e. a 'constant').

5.4.9 The remaining seven sites comprise three clusters.

5.4.10 Firstly, **Sites 317 and 320** are located close to the northern edge of the historic core, in proximity to both the district centre and the rail station, and both comprise PDL land currently in employment use. Site 317 has been identified as not warranting an employment designation (specifically, the Employment Land Review (2016) did not recommend this), although the proposal is for development in the latter part of the plan period, so presumably the existing employment use onsite will remain ahead of that time; whilst at Site 320 the proposal is to retain some employment uses. Both sites are subject to flood risk constraints.

5.4.11 Secondly, **Sites 407, 408 and 901** are located in the CBGB to the southwest of Bagshot, where there is a collection of built form alongside the A30, between Bagshot and Camberley, including a listed building and two adjacent homes with a degree of historic character (shown on the pre-1914 OS map, but not locally listed). Aside from historic environment constraint, considerations include:

- Accessibility – given a distance of over 1km to the district centre, although there is a cycle path along the A30, and also potentially good bus connectivity.
- Woodland - Site 408 comprises woodland shown on the pre-1914 OS map, and around half is shown as priority habitat by the nationally available dataset (magic.gov.uk).
- Rural character – there is a concern regarding intensification of built form in a sensitive part of the countryside between settlements, also mindful of a nearby site with planning permission for five homes at the southern edge of Bagshot (previously a SLAA site). However, it is noted that a low density scheme is proposed for all three sites (although the capacity of Site 407 has been increased since the previous stage). Also, the extent of nearby woodland and SANG serves to suggest limited risk of future 'sprawl'.

### Discounted sites

5.4.12 There are four discounted sites in total. One is in the urban area, two are within the Countryside Beyond the Green Belt (CBGB), to the south of the village, and one is located in the Green Belt, to the east.

5.4.13 Beginning with **Site 714** in the urban area has previously had Prior Approval for an office conversion, and so was identified as developable in the SLAA 2022, but the Council now feel that there is insufficient confidence regarding availability in the plan period.

5.4.14 With regards to the two sites in the CBGB, **Site 446** is an existing SANG; and **Site 798** is priority habitat woodland (associated with historic Pennyhill Park) with a blanket TPO covering the entire site, plus the site partly intersects the TBHSPA buffer. Both sites were put forward for SANG use.

5.4.15 With regards to **Site 736**, which is located in the Green Belt to the north of the village, the site is not adjacent to the settlement boundary and, indeed, is separated from the village by the A332; however, it is close to the settlement boundary (34m).

- 5.4.16 The site was closely considered in 2022, as part of the appraisal of reasonable growth scenario 2, and the appraisal did note that it benefits from reasonable transport connectivity, at least in comparison to other Green Belt options. Green Belt sensitivity is ‘middling’ amongst the list of Green Belt site options, and there is relatively limited landscape sensitivity to the north of Bagshot, according to the Landscape Sensitivity Assessment (2021), but a clear sensitivity is the effect of the adjacent main roads and railway.
- 5.4.17 A representation was then received through the consultation in 2022 suggesting capacity for 135 homes, along with “a minimum of 50% affordable homes”, and the site is now the subject of a planning application for 135 homes (ref. [23/1163/OOU](#)). Whilst it would not be appropriate to review proposals in detail, from the Planning Statement it is noted that there is clear merit in the proposed scheme in terms of affordable housing, including because: “as of 31st March 2023, 315 households were on the Council’s Housing Register. Of these, 166 householders have specified that Bagshot Ward was their preferred choice of location...” However, other benefits discussed in the Planning Statement are less clear, e.g. might be delivered as effectively via development elsewhere. Finally, there is a need to question the discussion presented at paragraph 8.6 of the Planning Statement regarding the ISA Report (2022). The suggestion is that the ISA Report established a “compelling basis” for supporting Growth Scenario 2, but this is not the view of the Council, as reported in Section 7 of the ISA Report (2022), and as discussed above.

### Conclusion

- 5.4.18 On the basis of the above discussion (also mindful of discussion within Sections 5.2 and 5.3), it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the six SLAA sites (over-and-above completions and commitments) for a total of 112 homes.
- 5.4.19 With regards to other feasible scenarios:
- There is limited strategic argument to explore lower growth, as total supply of 430 homes (excluding windfall) does not necessarily amount to a ‘high growth’ strategy for a village such as Bagshot. Another strategic factor is the LCWIP proposal to prioritise improved cycle connectivity to Camberley.
  - No proposed sites are flagged as potentially unsuitable. A primary consideration is flood risk affecting two sites, but these are PDL and the Environment Agency was consulted under Regulation 18.
  - Whilst several sites are associated with delivery risk, there is no clear basis to suggest that delivery should be assumed later in the plan period.
  - There is a need for ongoing consideration of higher growth scenarios, given good transport and accessibility credentials. However, higher growth would necessitate Green Belt release, and the one Green Belt site realistically in contention for allocation is associated with clear challenges. Also, it is important to be clear that the site could only deliver a modest sized scheme with limited potential to deliver wider benefits beyond new homes (including affordable homes).

## Bisley

### Completions and commitments

- 5.4.20 There has been 1 completion since the start of the plan period, and 3 homes have permission.

### SLAA sites

- 5.4.21 The SLAA identifies two sites for a total of 22 homes, namely **Sites 573** and **763**. Both are small sites (17 and 5 homes respectively) and within the settlement boundary, but considerations include:
- Open space – Site 763 comprises the edge of an area of strategic open space. It is council-owned, and its availability is subject to a review of assets. Capacity has been revised down to 5 homes since 2022.
  - Accessibility – Site 573 comprises PDL but is located near to the southern extent of the settlement, around 800m from the neighbourhood parade located near to the northern extent of the village.
  - Employment – Site 573 is a light industrial site but has previously had permission for residential.

### Discounted sites

- 5.4.22 Five of the six discounted sites are located within the Green Belt, with the one non-Green Belt site (**Site 236**) having a capacity of fewer than five homes. It was previously developable in the 2021 SLAA.

- 5.4.23 Of the five Green Belt sites, one site is thought to be unavailable (specifically, it was recorded as such in 2022 and no representation was received through the consultation) such that it can be ruled out at this stage in the process, namely **Site 741**. This site is notable for having relatively low Green Belt sensitivity, given adjacent built form and strong field boundaries that could be drawn upon for containment.
- 5.4.24 With regards to the remaining four sites – namely **Sites 740, 800, 902 and 903** – these sites were closely considered in 2022, as part of the appraisal of reasonable growth scenario 2, with the appraisal noting that site 800 is likely constrained in biodiversity terms. Also, this site is located close to Site 741, at the southern edge of the village, and Site 741 is the sequentially preferable site in Green Belt terms, and it is difficult envisage any strategic scale of growth across both sites, given biodiversity sensitivities.
- 5.4.25 The promoters of the three remaining sites did all submit a representation in 2022, but only one was clear regarding detailed proposals, namely Site 902. Specifically, the proposal here was for 80 homes plus a 100 bed care home, although this representation was subsequently withdrawn. This site is the most sensitive of the three in Green Belt terms, presumably reflecting its location within the gap separating Bisley from West End, and it comprises an existing area of green space, specifically a sports ground. However, the part of the site located closest to the village core falls within the TBHSPA 400m buffer, and so would need to be retained as green space, hence there could feasibly be the potential to secure enhanced green space to the benefit of the village, noting proximity to the village hall and local centre.
- 5.4.26 The two final sites (Sites 740 and 903) are located to the east of the village. There could be some potential to draw upon topography and/or features in the landscape for containment, but this is marginal, and this is clearly a sensitive landscape gap to Woking. There is also a degree of historic environment constraint, including the Grade 2\* church, which is associated with a rural setting and a historic network of bridleways.

### Conclusion

- 5.4.27 On the basis of the above discussion (also mindful of discussions within Sections 5.2 and 5.3), it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the two SLAA sites (over-and-above completions and commitments) for a total of 22 homes.
- 5.4.28 With regards to other feasible scenarios:
- There is limited strategic argument to explore lower growth, as total supply of 26 homes in the plan period amounts to a low growth strategy (albeit Bisley is closely associated with West End and Woking).
  - Site 763 is a greenfield site currently comprising accessible open space that warrants ongoing scrutiny, including from a delivery perspective, but this is a small site (5 homes).
  - None of the discounted / omission sites stand-out as having particular merit.

## Camberley town centre

### Completions and commitments

- 5.4.29 Data on completions and commitments is available only for Camberley as a whole. Specifically, there have been 391 completions since the start of the plan period, and 328 homes have permission.

### SLAA sites

- 5.4.30 The SLAA identifies six sites with capacity for 1,086 homes:
- **Site 25** (Camberley Station) – the Camberley Town Centre AAP indicates 50+ units at the site. However, a 150 home mixed use scheme is now considered appropriate *“taking account of the sustainable town centre location at Camberley train station and nearby buildings that are in excess of 4 storeys...”* The SLAA also explains that this is a “key regeneration site” given clear accessibility benefits / opportunities and also due to *“major regeneration sites on the other side of Pembroke Broadway.”*

With regards to deliverability, the SLAA explains: *“The site is considered to be developable in the medium term, as the existing office use would need to be relocated [or accommodated] and the train station itself would need to be redeveloped.”*

- **Site 27** (Land east of Knoll Road) – is a key strategic site, located on the fringe of Camberley Town Centre. It has been a focus of detailed work, particularly from a development viability perspective. The latest proposal is to separate out Former Portesbury School (Site 1015, discussed below) and, in turn, reduce the site capacity from 475 homes to 340 homes. This site is a focus of discussion in Section 9.



- **Site 721** (Central House, 75-79 Park Street) – is a small site at the southern extent of the primary shopping area (as currently defined). Capacity is 6 homes, as per an existing planning permission.
- **Site 814** (London Road Block) – is another key strategic site, located south of the A30 London Road on the edge of the town centre. As per Site 27, there has been a considerable amount of work, including in respect of development viability. The latest proposal is to reduce the capacity to ensure a focus on net capacity, and also to assume delivery in the final part of the plan period. There have also been some adjustments to the proposed use mix, as discussed further in Section 9.
- **Site 921** (Land east of Park Street, north of Princess Way) – is supported for a mix of town centre uses, including residential, having previously been supported for 120 homes in the 2021 SLAA (there is still flexibility for residential uses, but no residential supply from the site is assumed). This is a reflection of flexible options for the redevelopment of the site by the Borough Council who is the landowner.
- **Site 1005** (St James House, Knoll Road) – was a new site in the 2022 SLAA, having been submitted to the Council through the consultation in 2022. It is currently used for employment, but is in a highly accessible location, with the SLAA identifying capacity for 30 homes.
- **Site 1015** (Former Portesbury School) – was previously the eastern-most part of ‘Land east of Knoll Road’. The site comprises a former school on the edge of the town centre, and the adjacent former police station has recently been redeveloped. The identified capacity is 36 homes.

#### Discounted sites

- 5.4.31 There are two discounted sites, namely **Sites 250** and **1002**; however, the former is discounted due to availability concerns, whilst the latter is below the SLAA size threshold.

#### Conclusion

- 5.4.32 On the basis of the above discussion (also mindful of discussion within Sections 5.2 and 5.3), it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the six SLAA sites (over-and-above completions and commitments) for a total of 1,086 homes.
- 5.4.33 With regards to other feasible scenarios:
- There is clearly limited strategic argument for exploring lower growth.
  - Site capacities and delivery assumptions naturally warrant ongoing consideration.
  - There are no feasible discounted / omission sites. Whilst there is a longer term opportunity, e.g. in proximity to the station, no further developable supply to 2038 can be identified at the current time.

## Camberley wider urban area

#### Completions and commitments

- 5.4.34 Data on completions and commitments is available only for Camberley as a whole (see above)

#### SLAA sites

- 5.4.35 The SLAA identifies 15 sites with a total capacity of 233 homes.
- 5.4.36 Nine of these are retained from the 2022 SLAA (total capacity 196 homes, after having accounted for some C2 provision)<sup>14</sup> namely **Sites 21, 49, 240, 295, 314, 424, 717, 801, 833** and **877**.
- 5.4.37 All of these are small sites, and very limited changes have been made since the 2021 SLAA / Regulation 18 draft plan stage, but considerations include:
- Employment – Site 295 is both strongly associated with an existing employment area. Also, Site 314 comprises a builders merchants and Site 717 is currently a hotel.
  - Community uses – Site 240 currently comprises the Camberley Centre, which is an adult education centre. The existing use of an adult education centre would either need to be retained and incorporated as part of any future development or relocated in an equally accessible location.

<sup>14</sup> Sites 21 and 801 are proposed for C2 older persons accommodation, with C3 capacity assessed at 1 home for every 1.8 bedrooms within a C3 site. On this basis, both sites are associated with a C3 capacity of 32 homes.

- Historic environment – Site 240 includes a locally listed building, with the SLAA explaining “... *the site benefits from the Camberley County First School building, a local heritage asset, which strongly contributes to the ambience and attraction of the place. The building and its setting should be retained and form the focal core of the site in a heritage-led regeneration scheme... If the locally listed building [was] to form part of the proposed development, a higher capacity could be achieved at the site.*”
- Noise – Site 314 is adjacent to the railway line.
- TPOs – Site 717 is covered by an area TPO. Also, Site 801 is described as being located in an area with “*vigorous hedge boundaries which contribute to the verdant street scene character.*” A planning application was recently approved for 32 homes, which is lower than 44 figure in the 2022 SLAA.
- Greenspace – whilst most sites comprise PDL, Site 424 comprises non-designated amenity greenspace associated with a block of flats, including mature trees.
- Car parking – Site 833 comprises a car park and adjacent Site 49 comprises garages.
- Townscape / character – Site 877 is an existing single dwelling on a large plot proposed for eight homes.
- Combined scheme – Sites 49, 424 and 833 are adjacent, with a combined capacity of 49 homes.

5.4.38 Also, there are five new SLAA sites that have been added in the most recent SLAA, namely Sites **1006, 1007, 1008, 1009** and **1014**. These are all small sites that have previously had planning permission or have had recent planning activity e.g. an application submitted before the SLAA base date.

#### Discounted sites

5.4.39 There are nine discounted sites in total, of which four are small sites ruled out due to availability concerns, namely **Sites 6, 246, 500, 804 and 878**, whilst another two sites (**Sites 37 and 832**) are below the size threshold. Site 832 was previously identified in the 2022 SLAA as having capacity for five homes.

5.4.40 The remaining two sites are: **Site 802**, which comprises an area TPO; and **Site 904**, which is associated with suitability and viability concerns (it comprises Kings International College).

#### Conclusion

5.4.41 On the basis of the above discussion (also mindful of discussion within Sections 5.2 and 5.3), it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the 15 SLAA sites (over-and-above completions and commitments) for a total of 233 homes.

5.4.42 With regards to other feasible scenarios, the situation is broadly as per Camberley town centre, except that there is no particular reason to suggest any significant longer term growth opportunity (e.g. a step change in terms of support for ‘suburban intensification’ or ‘gentle densification’).

5.4.43 Finally, there is a need to note Yorktown Industrial Estate and adjacent Watchmoor Business Park, at the western extent of the urban area, which together are of larger-than-local significance. The latter site has recently gained planning permission for redevelopment from office to industrial uses, as discussed above in Section 5.2 and discussed further below, within Box 5.2.

## Chobham

5.4.44 As an initial point, it is important to note that whilst Chobham is currently washed over by the Green Belt, the current proposal is to inset the village from the Green Belt – see discussion in Appendix IV.

#### Completions and commitments

5.4.45 There have been 58 completions since the start of the plan period, and 17 homes have permission.

#### SLAA sites

5.4.46 The SLAA identifies two sites for a total of 106 homes. The sites are broadly unchanged from the 2022 SLAA, although one site is removed due to having planning permission (the Chobham Club).

5.4.47 A key site of note is **Site 447** (Chobham Rugby Club, Windsor Road), which has a capacity of 91 homes. The site includes some PDL, and SLAA explains “*development is dependent on the relocation of the existing recreational use. It has been advised that a new location has been sought, but until this can be fully established, the site is phased in the medium term... The capacity indicated in the submission is*

*relatively low in density and therefore it is considered that there is scope for the retention of green space and possible incorporation of additional green infrastructure on site.”* The aforementioned Chobham Club site, which has planning permission, is located adjacent to Site 447.

- 5.4.48 The other site is **Site 548**, which is located outside of the proposed Green Belt inset boundary. However, given existing onsite built form there is capacity for 15 homes without Green Belt release. Further considerations relate to flood risk and historic environment / landscape, recognising that the Chobham conservation area is adjacent, and the main building on the site is shown on the pre-1914 OS map.

#### Discounted sites

- 5.4.49 There are a total of 14 discounted sites, all of which are currently located in the Green Belt and will remain so if and when Chobham is inset. However, eight of these sites discounted for clear cut reasons, namely **Sites 409, 414, 510, 543, 835, 843, 917 and 919**. Specifically: six of these are beyond 50m of the draft inset boundary (plus Sites 543 and 917 are within the TBHSPA 400m buffer zone); and Sites 409 and 510 are entirely or mostly within flood risk zone 3.

- 5.4.50 With regards to the remaining six sites:

- **Site 890** (Fairoaks Airport) – is located within Chobham Parish but ~2km to the east of the village. It has already been introduced above, as a site that is being proposed for a Garden Village, and the only strategic growth option open to the Local Plan, outside of Camberley town centre. It was explored in detail as part of the appraisal of reasonable alternative growth scenarios in 2022 and continues to warrant close consideration at the current time, on balance. At this stage it is important to note that a planning application for a 1,000 home scheme was submitted in 2018 (ref. [18/0642](#)), but then withdrawn.
- **Sites 238, 546, 597, 916 and 918** – were closely considered in 2022, as part of the appraisal of reasonable growth scenario 2. The appraisal noted that Sites 916 and 918 are adjacent to the 400m SPA buffer zone (Chobham Common National Nature Reserve). For the other three sites the appraisal did not note any particular issues or opportunities, but two sites of note are:
  - Site 597 – this was the only site for which a consultation response was received from the site promoter in 2022, and the site is quite centrally located in Chobham, being located close to the Chobham Rugby Club site discussed above. However, the site includes a considerable amount of woodland / existing mature trees, and much of the site intersects an area TPO (the only area TPO at Chobham), which appears to reflect the extent of a former estate (as shown on the pre-WWI OS map). With regards to Green Belt sensitivity, this is recorded as somewhat high, but this reflects an assumption that the site would be developed in full, when in fact there would be an argument for developing the site in part (potentially with the remaining part of the site enhanced for biodiversity and made accessible). A further consideration is very extensive surface water flood risk affecting the site.
  - Site 238 – has overall notably low Green Belt sensitivity. However, it mostly comprises priority habitat woodland (albeit the woodland is not shown on historic maps) and the site is in very close proximity to Little Heath, which is an area of common land and a locally designated Site of Importance for Nature Conservation (SNCI). The potential for the site to contribute significantly to biodiversity at a landscape scale – specifically an area also including Little Heath and Chobham Common – can be envisaged.

- 5.4.51 Finally, at the Regulation 18 stage, as part of the appraisal of reasonable growth scenario 2, consideration was also given to the possibility of development at Site 548 over-and-above the option of redeveloping the PDL part of the site (as discussed above). However, this option is judged to overall perform poorly, including due to Green Belt sensitivity, historic environment sensitivity and flood risk. Also, no representation was received from the site promoter in 2022.

#### Conclusion

- 5.4.52 At the current time there are considered to be **two reasonable growth scenarios** for Chobham:

- 1) 114 homes across the two SLAA sites (plus completions and commitments); and
- 2) Scenario 1 plus Fairoaks Garden Village (see further discussion in Section 5.5).

- 5.4.53 With regards to other feasible scenarios:

- The question of whether Chobham should be inset from the Green Belt is explored in Appendix IV.
- Chobham Rugby Club does not give rise to any significant suitability concerns, but there is a degree of delivery risk, such that delivery might feasibly be assumed later in the plan period.

- Aside from Fair Oaks, none of the discounted / omission sites stand-out as having particular merit when viewed in isolation and there is limited strategic argument for exploring higher growth at Chobham itself. Total supply of 181 homes is not considered to represent low growth (albeit there has presumably been limited housing growth over recent decades given the Green Belt constraint).

## Deepcut

### Completions and commitments

- 5.4.54 There have been 320 completions since the start of the plan period, and 1,014 homes have permission (the majority of which is at the former Princess Royal Barracks strategic scheme, namely [Mindenhurst](#)).

### SLAA sites

- 5.4.55 The SLAA identifies 6 sites with a total capacity of 121 homes.
- 5.4.56 These sites are dispersed across an area that, whilst within Deepcut Ward, includes land that relates more closely to Frimley Green and Frimley to the west, plus Mychett is nearby to the south west. Also, it is noted that a representation was received from the Mychett, Frimley Green and Deepcut Society in 2022. Because this is a complex area, the figure for Deepcut from Appendix 2 of the SLAA is shown below.
- 5.4.57 Five of these are retained from the 2022 SLAA (total capacity 116 homes), namely:

- **Site 757** – the SLAA explains that the capacity has been reduced to 21 homes, to account for the *“irregular shape, areas of detachment, countryside location [and] group TPO on site.”* It is also noted that the railway is adjacent, and that part of the site falls within the TBHSPA 400m buffer. Furthermore, removal of trees and vegetation may be necessary to achieve safe access. The SLAA also explains: *“Much of the site consists of relatively dense, mature woodland.”*

There is also a need to consider accessibility and the relationship of the site to Frimley Green and the Princess Royal Barracks development. As part of this, there is also a need to note an adjacent site with permission for 13 self build homes (ref. [19/2311/OOU](#)) and a near adjacent permitted site for 65 homes (ref. [21/0769/FFU](#)) to the north (north of the railway), which was previously a SLAA site (Site 552).

Also, there is a need to note smaller sites 503 and 922 discussed below, which are located further to the north (north of the canal). These sites are all located in-between Deepcut and Frimley Green / Mychett, and so there is a need to consider in-combination effects and ensure a long term / strategic approach to growth in this area, including with a focus on maintaining settlement separation.

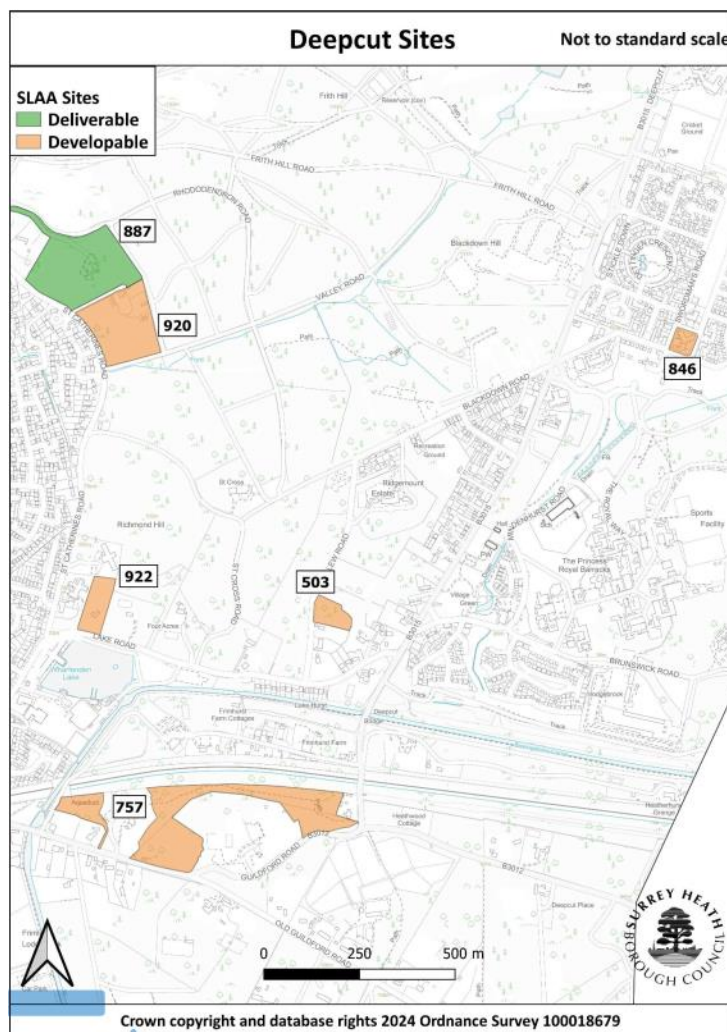
- **Site 846** – is a small previously developed site that gives rise to few issues.
- **Site 887** – this is a key site for consideration, as capacity of the site increased significantly between the 2021 SLAA and the 2022 SLAA. Specifically, whilst the capacity was previously 10 units C2 to reflect “significant woodland” that *“strongly contributes to the character and local distinctiveness of the area”* the new proposal is for 60 units C2 given that *“there is no known reason that a well-designed redevelopment proposal for this site could not overcome constraints associated with the site.”*
- **Site 920** – is adjacent to Site 887 and subject to similar issues, in that the site is strongly associated with the extensive area of woodland between Frimley and Deepcut. The site is notably adjacent to a woodland SNCI and, as per the Regulation 18 stage, the SLAA concludes:

*“Development of the site at 30dph would provide 95 dwellings. Due to the site’s heavily wooded character and location within an area of countryside that provides a gap between settlements, it is considered that capacity would need to be reduced, to retain woodland areas, and reflect the rural character of the locality... A capacity of 17 dwellings is derived, applying a lower threshold of 10dph to the remaining 1.7ha area, having regard to the rural, densely wooded character of the site.”*

- **Sites 922** has already been mentioned above as falling within the gap between Frimley Green and Deepcut. It is proposed as a low density scheme for five homes mindful of *“countryside designation, the limited existing built form and small size and surrounding low densities.”* Importantly, the previous intention (2022 SLAA) was to allocate the site in combination with adjacent Site 926 to the west for a total of ten homes; however, Site 926 is now the subject of a planning application for 2 homes (such that it is discounted in the SLAA). The effect of a 2 home scheme at Site 926 will be that a five home scheme at Site 922 might not relate as well to the Frimley Green settlement edge as would ideally be the case.

- 5.4.58 The final SLAA site is **Site 503**, which is a new site proposed for a low density scheme of five homes, with the SLAA explaining: *“It consists predominantly of pine woodland. The site is not subject to significant constraints, although it would be desirable to retain the wooded character and an assessment of protected species is likely to be required.”* It has already been mentioned above as falling within the gap between Deepcut and Frimley Green, although concerns in this regard are allayed on account of a nearby site previously proposed for five homes now being discounted due to availability concerns (Site 504).
- 5.4.59 Finally, there is a need to note a large new proposed SANG in this area, as discussed [here](#). The SANG will comprise a large part of the land between Deepcut and Frimley Green, and in combination with the canal and railway might provide a framework for the long term planning of this part of the borough.

**Figure 5.5: SLAA 2023 sites (i.e. sites not discounted by the SLAA) at Deepcut**



**Discounted sites**

- 5.4.60 There are seven discounted sites in total, of which three are ruled out due to availability concerns (**Sites 378, 504 and 830**) and three are below the SLAA site size threshold (**Sites 906, 923 and 926**). The final site (**Site 836**) is also ruled out for relatively clear reasons, with the SLAA stating: *“The site comprises part of the SANG that is in place to mitigate the impacts of the Princess Royal Barracks development.”*

N.B. also see stand-alone discussion of Site 830 (Land at Pine Ridge Golf Course) in Box 5.1, above.

**Conclusion**

- 5.4.61 On the basis of the above discussion (also mindful of discussion within Sections 5.2 and 5.3), it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the six SLAA sites (over-and-above completions and commitments) for a total of 121 homes.

- 5.4.62 With regards to other feasible scenarios:

- Site 757 is a more sensitive site but must be considered in the context of adjacent/nearby permitted sites, and no major issues were raised through the consultation in 2022. Finally, it is noted that the assumption is now that the site will deliver in the middle part of the plan period rather than the latter part.

There is also a need to consider the in-combination effects of Site 757 with other sites (proposed and committed) in the broad area between Deepcut and Frimley Green / Mychett, as discussed.

- Also, with regards to adjacent sites 887 and 920, there is a need to ensure a strategic approach to growth in this area, namely the extensive area of woodland between Frimley and Deepcut / Princess Royal Barracks. In this respect, it is noted that the proposal is to deliver a large new SANG adjacent to the south, and also that nearby Site 830 (Land at Pine Ridge Golf Course) could potentially be made available in the future. A further consideration is that these sites link quite well to Frimley district centre.
- There are no feasible discounted / omission sites.

## Frimley

### Completions and commitments

- 5.4.63 There have been 145 completions since the start of the plan period, and 79 homes have permission.

### SLAA sites

- 5.4.64 The SLAA identifies one site, namely **Site 907** (Sir William Siemens Square), which is currently the subject to a pending application (ref. [24/0116/FFU](#)) for 170 homes, having previously been identified as having capacity for 200 homes. The current application is for a residential scheme, but the site has previously been discussed as potentially suited to a mixed use scheme given that it currently comprises an office park described by the Employment Land Technical Paper (2019) as “*high quality*” and “*high profile*”. However, it is important to note that the site is now vacant. The SLAA explains: “*In accordance with Core Strategy Policy CP8, the loss of employment sites will only be permitted where wider benefits to the community can be shown. This can only be demonstrated through the planning application process.*”

### Discounted sites

- 5.4.65 There are two discounted sites, with one ruled out for clear (availability) reasons, namely **Site 566**. The other site is then **Site 837**, which comprises former playing fields and was supported for development through the 2021 SLAA. It is now discounted due to ‘suitability and viability concerns’.

### Conclusion

- 5.4.66 On balance it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for one site (over-and-above completions and commitments) for 170 homes.

- 5.4.67 With regards to other feasible scenarios:

- There is a need for ongoing consideration of Site 907, including given the possibility of a higher density scheme and/or a mixed use scheme. However, it is not clear that there is a strategic choice to the extent that there is a need to formally define and progress site-specific alternatives to Section 5.5.
- There are no feasible discounted / omission sites. Whilst there is a potential longer term opportunity at Pine Ridge (see Box 5.1) and also potentially at Frimley Park Hospital (see discussion in the [SLAA](#)), no further developable supply to 2038 can be identified at the current time.

- 5.4.68 Finally, there is a need to note two key employment areas at Frimley, namely:

- SC Johnson – is a large vacant site that is expected to be redeveloped for employment (see Box 5.2).
- Frimley Business Park – is currently largely office space but there is an extant planning permission for redevelopment into a wider range of uses including industrial/logistics (ref. [21/0895/FFU](#)).

## Frimley Green

### Completions and commitments

- 5.4.69 There have been 12 completions since the start of the plan period and 173 homes have permission.

### SLAA sites

- 5.4.70 The SLAA identifies one site for 60 homes, namely **Site 299**, which comprises public sector land and was a new site in the 2022 SLAA (when its identified capacity was 50 homes). The site includes a dismantled railway, which formerly provided a link between the Frimley to the Guildford Line and the mainline to London via Woking, and the site is currently safeguarded for a reinstatement of this link; however, this safeguarding designation is not proposed to be taken forward through the emerging Local Plan. Assuming no need to reconsider the safeguarding matter, with a view to improved rail connectivity, then the site gives rise to few concerns other than air and noise pollution from the adjacent railway lines.

### Discounted sites

- 5.4.71 The three discounted sites - **Sites 195, 329 and 512** - are all discounted due to availability concerns.

### Conclusion

- 5.4.72 It is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for one SLAA sites for 60 homes. There appears to be relatively little in the way of strategic choice at Frimley Green, assuming no need to reconsider the matter of safeguarding the former railway link.

## Lightwater

### Completions and commitments

- 5.4.73 There has been 2 completions since the start of the plan period, and 3 homes have permission.

### SLAA sites

- 5.4.74 The SLAA identifies one site for 21 homes, namely **Site 908**. This is a PDL site previously supported for 17 homes, with the 21 homes figure reflecting a current planning application (ref. [24/0136/FFU](#)).

### Discounted sites

- 5.4.75 The three discounted sites - **Sites 909, 910 and 911** – are all within the TBHSPA buffer.

### Conclusion

- 5.4.76 It is reasonable to progress just **one growth scenario** to Section 5.5, involving support for the one SLAA site for 21 homes. There appears to be little in the way of strategic choice at Lightwater. The village is set to see low growth over the plan period, but this reflects the extent of environmental constraint, with the TBHSPA abutting two sides of the village, and the third side defined by the A322 with the Windle Brook corridor beyond (associated with extensive woodland and a cluster of listed buildings).

## Mytchett

### Completions and commitments

- 5.4.77 There has been 126 completions since the start of the plan period, and 137 homes have permission.

### SLAA sites

- 5.4.78 The SLAA identifies capacity at two sites for a total of 23 homes (as per the previous two SLAAs), namely:

- **Site 912** – is located in a sensitive location, strongly associated with the River Blackwater valley; however, there is no priority habitat intersecting the site, and there appears to be the potential to deliver homes on a small part of the site whilst avoiding the flood risk zone. Open land subject to flood risk in this area appears not to be accessible (the Blackwater Valley Path is on the far side of the A331), so the potential to increase accessibility to the open greenspace in this area will need to be explored.
- **Site 1000** – is a smaller site but is similarly sensitive. The site is adjacent to open access land associated with a lake and recreational uses (accessible from the Blackwater Valley Path), which is also a designated SNCI, and the site is shown as mostly comprising woodland priority habitat. Also, the SLAA explains: *“The site is currently located within Flood Zone 1. However, the modelling in the Surrey Heath Strategic Flood Risk Assessment 2020 indicates that the site will fall almost entirely within Flood Zone 3a in the 2080s. This should be taken into consideration in any forthcoming planning application.”*

### Discounted sites

5.4.79 There is only one discounted site, namely **Site 867**, which is discounted due to availability concerns.

### Conclusion

5.4.80 On balance, it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario that sees support for both SLAA sites, for a total of 23 homes.

5.4.81 With regards to other feasible scenarios:

- At the Regulation 18 stage attention was drawn to the possibility of a scenario involving removing or revising down the capacity of one or both SLAA sites, with a view to reflecting Blackwater Valley sensitivities, and also with a view to planning with climate change resilience in mind. However, no particular concerns were raised through the Regulation 18 consultation.
- There are no feasible discounted / omission sites.

5.4.82 Finally, at Mytchett, there is a need to note Mytchett Place Business Park, which is located in the CBGB to the south east of Mytchett. There is an assumption of intensification of the site, in line with the findings of the Employment Supply Assessment (2023), with SPA (within 400m) and potentially traffic implications.

## West End

### Completions and commitments

5.4.83 There have been 238 completions since the start of the plan period, and 1 home has permission.

### SLAA sites

5.4.84 The SLAA identifies four sites with a total capacity of 37 homes.

5.4.85 A key site for consideration is **Site 178** (Land east of Benner Lane), which would expand a recently completed large scheme and represents a remaining part of the housing reserve site dating from 2000 (saved Policy H8). The previous 2021 SLAA identified capacity of 73 homes, but the site has now been reduced in extent, and has an identified capacity of 16 homes. There is onsite woodland/forestry, but the site benefits from an adjacent primary school. West End local centre is over 500m distant.

5.4.86 With regards to the final four sites:

- **Site 153** – is located within the Green Belt; however, given existing onsite built form there is capacity for 7 homes without Green Belt release.
- **Site 799** – is located within the Green Belt, but the SLAA identifies capacity for six homes on PDL without impacting on the openness of the Green Belt. This is a more sensitive site, given flood risk and a location in the gap between West End and Bisley. Also, there are existing employment uses onsite, although the corollary is limited concern regarding impacts to openness.
- **Site 840** – is a small site for eight homes adjacent to Site 178 and does not give rise to notable concerns.

5.4.87 Focusing on Sites 153 and 799, there is the option of higher growth involving Green Belt release, which was explored as part of the appraisal of reasonable growth scenario 2 in 2022. The promoters of both sites submitted responses to the consultation in 2022, suggesting 100 homes and 60 homes respectively; however, both sites are subject to notable constraints in addition to Green Belt sensitivity, particularly proximity to the SPA in the case of Site 153 and flood risk in the case of Site 799. There is also a need to consider the sensitivity of the river corridor between West End and Bisley, including noting a cluster of listed buildings associated with the river corridor close to Site 153, and also noting a bridleway along the river corridor that runs adjacent to Site 153 (linking to listed buildings at Bedlam Bridge).

### Discounted sites

5.4.88 There are a total of four discounted sites, of which three are located in the Green Belt. With regards to the one non-Green Belt site, this is **Site 1006**, which was previously supported for five homes, but is now being promoted for less than five homes (i.e. below the size-threshold). This is the last remaining part of a second housing reserve site in the adopted Local Plan and would 'round off' the settlement edge, although there is an area TPO, with at least one veteran Oak evident along the road frontage.



- 5.4.89 With regards to the three Green Belt sites, two of these sites - namely **Sites 347 and 914** - can be ruled out at this stage due to being poorly related (beyond 50m) to the settlement boundary (once account is taken of a potential expanded boundary to reflect Site 178).
- 5.4.90 The remaining site is then **Site 813**, which was considered in detail as part of the appraisal of reasonable growth scenario 2 in 2022. This highlighted a surface water flood risk concern, and otherwise there is a concern regarding piecemeal expansion. It would mean extending Site 178, but this site is set to be well-bounded by woodland/forestry. Also, the site promoter did not submit a response to the 2022 consultation.

### Conclusion

- 5.4.91 On the basis of the above discussion (also mindful of discussion within Sections 5.2 and 5.3), it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the four sites (over-and-above completions and commitments) with a total capacity of 37 homes.
- 5.4.92 With regards to other feasible scenarios:
- The Interim SA Report (2022) noted that *“there is a need to carefully consider the appropriateness of supporting housing at Site 799 given its location in flood risk zone 2...”* However, flood risk concerns are now reduced, as the Environment Agency has been consulted, and this is a small site for 6 homes.
  - There is limited strategic argument for Green Belt release at West End, and none of the available sites stand-out as having particular merit. There is a need to consider that West End is associated with relatively high recent and committed growth and is likely associated with quite high rates of car dependency, e.g. noting that there is only a neighbourhood centre. There is a need to avoid piecemeal expansion and focus on growth options that delivers benefits to the community, e.g. a local centre.

## Windlesham

### Completions and commitments

- 5.4.93 There have been 12 completions since the start of the plan period, and 157 homes have permission.

### SLAA sites

- 5.4.94 The SLAA identifies four sites with a total capacity of 49 homes. Three of these sites are retained from the 2021 and 2022 SLAAs, whilst the one new site (**Site 1011**) is a new PDL site in the settlement boundary where there is a recent planning permission for 8 homes (ref. [23/0311/FFU](#)).
- 5.4.95 **Sites 844 and 1004** warrant being considered together, as they are adjacent sites that together form a small component of a wider allocated housing reserve site to the east of Windlesham that was removed from the Green Belt through the Local Plan adopted in 2000.
- 5.4.96 The bulk of the reserve site now has planning permission for 116 homes and is also delivering a community building (with parking) and a SANG on land adjacent to the southwest (i.e. to the south of Windlesham; see discussion below). Figures showing the extent of development and the location of the SANG can be seen within the Design and Access Statement submitted as part of the application (ref. [20/0318/RRM](#)).
- 5.4.97 Sites 844 and 1004 are located adjacent to the south of the permitted site, and so perform reasonably well in terms of relationship to what will become the settlement edge. However, the reserve site as a whole is strongly associated with woodland, and the great majority (all bar a small part of Site 1004) is covered by an area TPO. This is a clear sensitivity in respect of Sites 844 and 1004. However, there appears to be some variation in respect of the make-up of the woodland, in terms of age, species and potentially quality; for example, the nationally available priority habitat dataset suggests that only Site 844 comprises priority habitat, and different types of woodland across the two sites are also evident from the pre-WWI OS map.
- 5.4.98 With regards to Site 844, capacity was established at 20 homes on the basis of pre-application discussions, and it is now the case that a planning application has been submitted for 20 affordable homes (ref. [23/0080/FFU](#)). The SLAA explains: *“The site is densely wooded and is wholly within a TPO. The site was previously submitted for 20 dwellings as part of the Call for Sites exercise. Due to the sites constraints it is considered that a low density development is suitable for the site.”*

5.4.99 With regards to Site 1004, the SLAA explains: “*The previous planning application for this site was for 34 dwellings. The site is now being promoted for a lower capacity of 16 units in total, which reflects half of the site being within a TPO.*” However, the latest situation is that two planning applications for a total of 16 homes were recently refused (ref. [23/0486/FFU](#) and ref. [23/0581/FFU](#)).

5.4.100 Finally, **Site 834** comprises a collection of buildings associated with Broadway Green Farm, including older farm buildings and some more modern industrial units. The site is located in the Green Belt between Lightwater and Windlesham, but the SLAA explains the potential to deliver new homes without Green Belt release. Considerations relate to relationship / accessibility to Lightwater; heritage; flood risk; and employment, as discussed further in Section 9. The 2023 SLAA reduces capacity from 7 homes to 5.

5.4.101 Finally, with regards to Site 834, it is noted that the site promoter submitted a consultation response in 2022 suggesting capacity for 26 homes, but this is not a reasonable option, given the issues discussed.

#### Discounted sites

5.4.102 There are a total of seven discounted sites, all of which are located in the Green Belt bar **Site 765**, which has availability concerns. Of the six Green Belt sites, one has availability concerns, namely **Site 445**, which is currently a garden centre located along the A30 to the east of the village.

5.4.103 With regards to the remaining five sites, one site is clearly poorly related to the settlement, namely **Site 1004**. This is also the historic core of Windlesham, which indicates sensitivity but also feasibly opportunity, from a perspective of consolidating Windlesham and supporting access to community infrastructure.

5.4.104 Of the four remaining sites, three were considered closely in 2022 as part of the appraisal of reasonable growth scenario 2, namely **Sites 609, 809 and 915**. The final site is then **Site 276**, which was thought to be unavailable in 2022, but is now thought to potentially be available. Taking these sites in turn:

- Sites 276 and 809 – are adjacent sites at the northeast extent of Windlesham, specifically at the eastern extent of the Snows Ride part of the settlement. There is a degree of landscape containment, Site 276 includes some PDL (an employment area) and Site 809 benefits from access to the A30, such that there is connectivity to Bagshot Station to the west and Sunningdale station to the east (both within 2.5km; there is also a footpath along the A30, but not cycle path).

However, there is likely to be heritage and character sensitivity, given nearby Windlesham Court (albeit not nationally or locally listed) and associated large homes. The pre-WWI OS map shows Site 276 as a cricket pitch and Site 809 as within the grounds of Windlesham Court. The promoter for Site 809 submitted a response to the consultation in 2022, suggesting the potential for 100 homes, but a preferable scheme might involve higher density housing alongside community infrastructure. There would be a concern regarding urban sprawl along the A30, noting the recently permitted garden centre redevelopment scheme between Snows Ride and Broomhall; however, there is a tree belt along the A30 that could provide screening and there are no public rights of way in the vicinity (indeed, there is only one public right of way linking to Snows Ride, potentially suggestive of a growth-related opportunity).

- Site 609 – falls within the land parcel discussed above as having planning permission for 116 homes. It comprises the northern extent of the site, and the only part of the site that has not been removed from the Green Belt. As part of the planning permission granted it is set to be retained as woodland.
- Site 915 – is located to the south of Windlesham, comprising the northwest extent of the land between the settlement edge and the committed SANG (discussed above). It contributes to Green Belt purposes to a limited extent, but access would seemingly require demolition of at least one existing house. The site promoter did submit a response to the consultation in 2022 but was not clear regarding capacity of the site. Also, there is a need to note a pending planning application for the land adjacent to the east (i.e. the northeast extent of the land between the settlement and the committed SANG). The application (ref. [22/0935/OOU](#)) is for 20 homes and seemingly would not assist with achieving access to Site 915.

#### Conclusion

5.4.105 On the basis of the above discussion (also mindful of discussion within Sections 5.2 and 5.3), it is reasonable to progress just **one growth scenario** to Section 5.5, namely a scenario involving support for the four sites (over-and-above completions and commitments) with a total capacity of 49 homes.

5.4.106 With regards to other feasible scenarios:

- Three of the proposed allocations do warrant ongoing consideration from a suitability and capacity perspective. However, all three have been consulted upon with limited concerns raised that lead to a clear argument for formally testing a lower growth scenario. Also, Windlesham does not benefit from a primary school (but there are two infant schools), which serves as an argument for limiting growth.
- There are higher growth scenarios involving Green Belt release that could feasibly be considered. However, as discussed in Section 5.2, there are now considered to be limited strategic arguments for Green Belt release, and there is little reason to suggest the potential for a strategic site to deliver new homes alongside a new primary school or Gypsy and Traveller pitches. Also, it is important to recognise that almost the entire edge of Windlesham / Snows Ride is shown by the Landscape Sensitivity Assessment (2021) to have relatively high landscape sensitivity (see Appendix II). Another strategic factor is the LCWIP proposal to prioritise improved cycle connectivity along New Road to Bagshot.

## Conclusion on sub-area scenarios

- 5.4.107 This section has considered growth scenarios for each of the borough's eleven defined sub-areas in turn, drawing upon the top down and bottom up inputs set out in Sections 5.2 and 5.3. As part of this, account is taken of the Interim SA Report (2022), including the appraisal of growth scenario 2 from that stage.
- 5.4.108 For ten sub-areas the conclusion is that only one growth scenarios reasonably needs to be progressed to Section 5.5, where sub-area scenarios are combined to form reasonable growth scenarios for the borough as a whole (i.e. the formally required 'reasonable alternatives' for appraisal and consultation).
- 5.4.109 **Chobham** is then the one sub-area progressed as a 'variable'. Specifically, two scenarios are progressed, namely: A) the emerging preferred approach involving allocation of two sites identified as 'Realistic Candidates for Development' in Appendix 2 of the SLAA ('SLAA sites'); and B) higher growth via additional allocation of Fair Oaks Garden Village (see discussion in Section 5.5).
- 5.4.110 Focusing on the ten sub-areas progressed to Section 5.5 as a 'constant', in each case the emerging preferred growth scenario simply involves allocation of all 'SLAA sites'. The decision to hold the approach to growth across these sub-areas constant across the RA growth scenarios (Section 5.5) is considered to be justified, on the basis of the discussion above. However, that is not to say that there are not outstanding questions around growth strategy and site options that warrant ongoing consideration.
- 5.4.111 Considerations include:
- **Bagshot** – there is a need for ongoing consideration of higher growth scenarios, given good transport and accessibility credentials. However, higher growth would necessitate Green Belt release, and the one Green Belt site realistically in contention for allocation is associated with clear challenges. Also, it is important to be clear that the site could only deliver a modest sized scheme with limited potential to deliver wider benefits beyond new homes (including affordable homes).
  - **Windlesham** – may also warrant ongoing consideration of higher growth scenarios via Green Belt release, including potentially in order to deliver a primary school, and noting the proposal for increased cycle connectivity to Bagshot (south of the area) and good links to the A30 (north of the area, i.e. Snows Ride). However, it is less clear that there are any realistic options at the current time, and it is important to note significant committed growth, plus notable proposed growth through SLAA sites.
  - **Bisley** – is another settlement with a need for ongoing consideration of higher growth scenarios via Green Belt release, although it is not at all clear that there are any realistic options at the current time. The village's close relationship with Woking is a factor potentially in favour of growth. However, there is a need to recall that Bisley only benefits from a neighbourhood centre, plus the village is distant from a train station and there is very limited potential to access key destinations by public transport or cycling.
  - **West End and Chobham** – are the other settlements where there is feasibly the potential to explore higher growth via Green Belt release, but there appears to be less case for further work to explore this possibility, having accounted for available sites / site-specific considerations and strategic factors.
  - **Deepcut / Mytchet / Frimley Green** – there is a need to consider growth in this area with a long term perspective, with a view to avoiding piecemeal growth giving rise to issues and opportunities missed.

- **A number of settlements** – require ongoing consideration of lower growth scenarios. There are few concerns regarding the suitability of proposed SLAA sites (in isolation or in combination), but there is naturally a need for ongoing scrutiny of delivery assumptions. There are no specific concerns in this respect, and it is noted that a number of adjustments have been made in light of detailed work since the previous SLAAs, but there is a need for ongoing scrutiny, with a view to a suitably cautious approach.

## 5.5 Reasonable growth scenarios

- 5.5.1 The final task (see Figure 5.1) is to combine the sub-area scenarios introduced above to form a single set of reasonable growth scenarios, also accounting for supply from completions, commitments and windfall.<sup>15</sup>
- 5.5.2 This task is straightforward in light of Section 5.4, which concludes that there are alternative growth scenarios for only sub-area (Chobham). However, there is a need for a final check-and-challenge in light of the discussion of strategic factors presented in Section 5.2.
- 5.5.3 The reasonable growth scenarios that emerge from Section 5.4 are set out in Table 5.1, namely:
- **Scenario 1** – completions (i.e. homes completed since the start of the plan period), commitments (i.e. sites with planning permission), windfall (the assumed homes that will come forward at sites not currently identified) and SLAA sites (i.e. the Realistic Candidates for Development listed in the Appendix 2 of the 2023 SLAA on the basis that they are deliverable or developable).
  - **Scenario 2** – involving Scenario 1 plus additional allocation of Fairoaks Garden Village. The site is associated with a range of issues (perhaps most notably in respect of transport / traffic considerations, in light of latest evidence), but does include an element of PDL, is being promoted as a ‘Garden Village’ (GV) and could deliver Gypsy and Traveller pitches (albeit in the longer term). Total capacity of the site, on the basis of work completed by the site promoters, is “at least 1,500 homes”, but a safe assumption (given delivery risks and uncertainties) is that ~1,000 homes would come forward in the plan period.

**Table 5.1: The reasonable growth scenarios (with constants greyed-out)**

Supply component	Growth scenario 1	Growth scenario 2
	Constant supply components	Constant supply components + Fairoaks GV
Completions	1,501	1,501
Commitments <sup>16</sup>	1,990	1,990
Windfall	481	481
SLAA sites <sup>17</sup>	2,040	2,040
Fairoaks Garden Village	0	1,000
<b>Total supply (2019-2038)</b>	<b>6,012</b>	<b>7,012</b>
<b>% above 5,578 (294 dpa)</b>	<b>8%</b>	<b>26%</b>

<sup>15</sup> Completions are those homes that have been delivered since the start of the plan period (2029), whilst commitments are those homes set to come forward at sites with planning permission

<sup>16</sup> Total capacity is 2,034 homes. However, a 4% lapse-rate has been applied to reflect historic rates of non-delivery.

<sup>17</sup> This breaks down as 1,903 homes from sites formally allocated in the local plan plus 137 homes from other SLAA sites.

- 5.5.4 Under Scenario 1, a total 'supply buffer' of 8% would be sufficient (to account for unforeseen delivery issues). It should also be noted that the level of supply is front-loaded towards the start of the plan period, such that the supply buffer is in fact more than 8% over the early years, and then the supply falls below the annual requirement in latter years (from 2031), but this does not generate any significant concern, because there will be the potential to boost supply for these years through a Local Plan Review.
- 5.5.5 Under Scenario 2 a supply buffer of 26% is more than is needed, such that it would be possible to set the housing requirement modestly above 294 dpa, as a positive approach to boosting supply of market and affordable housing locally (e.g. 325 dpa, which would lead to a supply buffer of 14%, which could be appropriate given uncertainties / delivery risks associated with Fair Oaks GV).
- 5.5.6 A final consideration is the possibility of a third growth scenario whereby the whole of the Fair Oaks GV is allocated, in addition to the 'constant supply components'. This could increase total supply by 500 homes but over an extended plan period. This is not considered a reasonable scenario as it would mean extending the plan period which, in turn, would generate a need to revisit the evidence-base underpinning the local plan. This has already been discounted for reasons set out above in Section 2.3.
- 5.5.7 In this light and having accounted for all of the discussion presented above (i.e. read as a whole), the reasonable growth scenarios presented in Table 5.1 are considered to be the formally required "reasonable alternatives" at the current time.<sup>18</sup> Also see the two maps below.<sup>19</sup>
- 5.5.8 Other feasible borough-wide reasonable growth scenarios are ruled out as unreasonable. In other words, there is not considered to be a reasonable need to further test scenarios involving:
- Reduced or delayed supply from any SLAA sites – there is no strategic case for this and Section 5.4 identifies few suitability or delivery concerns, although delivery assumptions require ongoing scrutiny;
  - Boosting supply from any SLAA sites – Section 5.4 does not identify any options of note; or
  - Allocation of any 'other' discounted SLAA sites (i.e. other than Fair Oaks) – the only feasible options would involve Green Belt settlement expansion, but all such scenarios are ruled out as unreasonable on balance, in light of the discussion of strategic factors, site options and sub-area scenarios above.
  - An extended plan period, for the reasons discussed in Section 2.3.
- 5.5.9 Finally, there is a need to explain assumptions, under the two scenarios, in respect of: Employment land (Box 5.2); and providing for Gypsy, Traveller and Travelling Showpeople accommodation needs (Box 5.3).

**Box 5.2: Assumptions made under the two scenarios regarding employment land**

Need for employment land has already been discussed in Section 5.2, but more specifically there is a need to consider Table 4.5 of the Employment Land Technical Paper (2023), which is presented below.

The table sets out the balance between need (see the first row) and supply (the second and third rows), concluding that there is a residual need (i.e. after having accounted for completions and commitments) for a fairly modest amount of office floorspace and a more significant amount of industrial floorspace.

Specifically, and focusing on the 'high' scenarios, there is a need for 16,546m<sup>2</sup> floorspace for office / R&D and a residual need for 44,609m<sup>2</sup> industrial floorspace. Furthermore, there is a need to note additional proposed loss of office floorspace through several SLAA sites, most notably Sir William Siemens Square. At only one very small site (Site 320) sites is the intention for a mixed uses scheme to include employment land.

Taken at face value, Table 4.5 suggests a need to allocate new employment land through the Local Plan, e.g. land to support  $\sim 16,500 + \sim 44,500 = \sim 61,000\text{m}^2$  employment floorspace in total. However, there are a number of other factors to consider. In particular, there is the need to account of additional unimplemented permissions (notably at Watchmoor Business Park), granted since the Employment Land Technical Paper was produced.

After accounting for this, the overall residual floorspace needs falls considerably, and breaks down as follows: up to 20,300m<sup>2</sup> for offices (i.e. an increase given recent permissions); up 22,600m<sup>2</sup> for industrial (i.e. a decrease).

<sup>18</sup> As discussed in Sections 1 and 4, the SA Report must present an appraisal of "the plan and reasonable alternatives".

<sup>19</sup> The maps aim is to show simplified environmental constraints, to enable proposed development sites to clearly stand-out. In particular, this means that the maps do not differentiate between the SPA and the SPA 400m buffer, nor do they show the other designations that overlap the SPA, namely SSSI. Also, the maps do not show the Basingstoke Canal SSSI / Conservation Area; nor do the maps show SNCIs or heritage constraints, which together heavily constrain much of the CBGB. With regards to Green Belt, transparency is used show where this intersects the SPA (plus buffer)

In relation to land supply to address the identified needs, evidence is provided by an Employment Supply Assessment, which identifies potential for **~74,000m<sup>2</sup>** supply from intensification of existing employment sites.

However, there is considerable uncertainty associated with supply from intensification, as discussed within the Employment Supply Assessment. Notably, there is considerable uncertainty regarding the future of the SC Johnson Site, which has potential redevelopment opportunity, given the existing 25,000sqm floorspace. The study also explains that supply from vacant floorspace has been *“to this point... not included within the core supply as a degree of vacancy within the stock is healthy.”*

More detailed consideration of the proportion of these opportunities which could contribute towards the identified needs, is set out in the [Employment Topic paper](#). However, what is evident is that policy support for intensification within existing designated Employment sites, along with policy support for new employment uses in suitable locations beyond the designated sites, should be more than sufficient to meet residual needs and, in turn, there is no strategic case to allocate new employment land through the Local Plan.

Also, it is the case that there are no employment land omission sites that stand-out as warranting mention as potential options for boosting supply (and, to be clear, none are discussed in Section 5.4).

Having said this, Fair Oaks Garden Village would deliver an extension to an existing strategic employment site, and this option warrants consideration ‘on its merits’. See further discussion in Section 6.

*Residual floorspace needs (Iceni, 2023), prior to including Watchmoor Business Park extant permission*

	Office / R&D Low	Office / R&D High	Industrial (Factories and Warehousing) Low	Industrial (Factories and Warehousing) High
Floorspace Need	6,500	15,800	38,000	63,000
Completions Since March '22	6,025	6,025	16,968	16,968
Unimplemented Permissions	-6,771	-6,771	1,423	1,423
<b>Residual Floorspace Need</b>	<b>7,246</b>	<b>16,546</b>	<b>19,609</b>	<b>44,609</b>

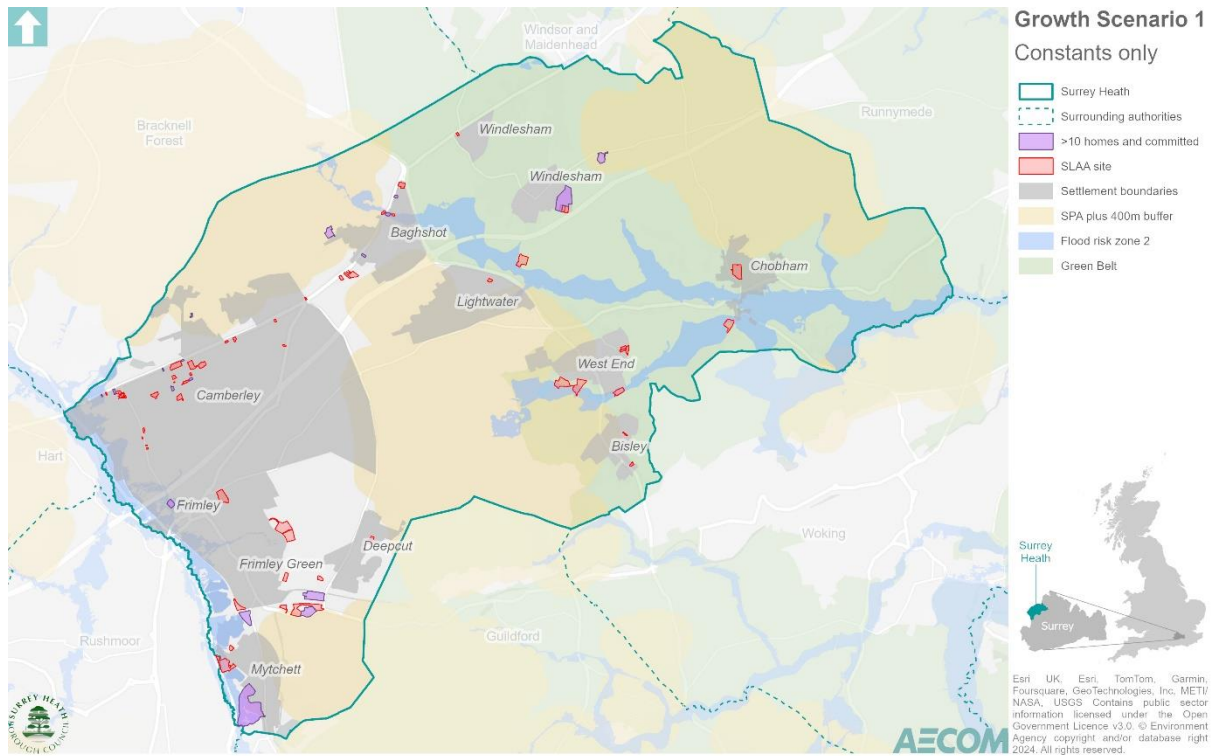
**Box 5.3: Assumptions made regarding Gypsy, Traveller and Travelling Showpeople accommodation**

There is only one reasonable scenario, as introduced in Section 5.2 and discussed further in Section 9. This involves allocation of land to extend the existing Swift Lane Gypsy and Traveller site, to deliver five pitches.

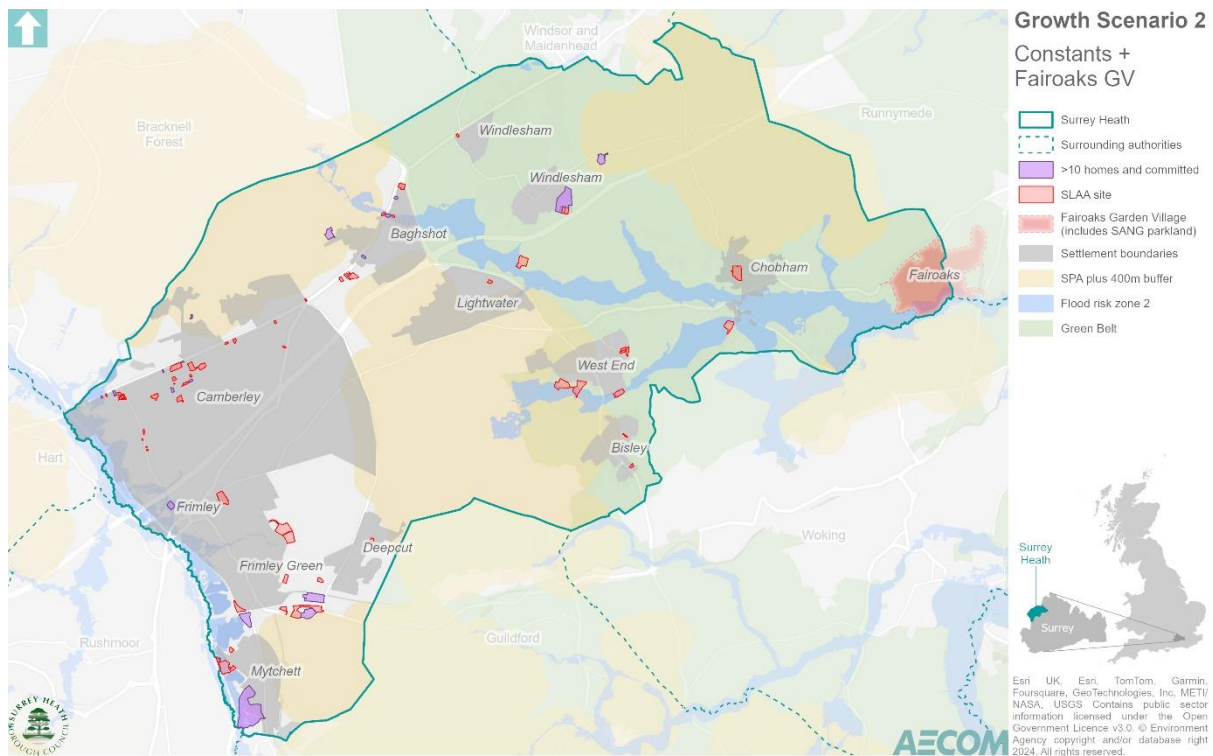
To recap, whilst detailed work was undertaken in 2022 to define and appraise reasonable scenarios, as reported in Sections 5 and 6 of the [Interim SA Report Addendum](#) published for consultation as part of a targeted consultation, matters have since moved on, such that three of the four allocation options that featured within the scenarios in 2022 are now no longer considered achievable and/or suitable (all bar Swift Lane Extension).

There are no other sites for Gypsy and Traveller pitches or Travelling Showpeople plots realistically in contention, and it is also recognised that the situation sub-regionally has seemingly not improved since 2022, hence the importance of considering delivery of pitches at Fair Oaks GV. See further discussion in Section 6.

Growth scenario 1: Constant supply components (i.e. all sites identified as deliverable or developable by the SLAA)



Growth scenario 2: Scenario 1 plus Fairoaks Garden Village (~1,500 homes in total; ~1,000 in the plan period)



## 6 Growth scenarios appraisal

### 6.1 Introduction

6.1.1 The aim of this section is to present an appraisal of the reasonable growth scenarios introduced above. Table 6.1 presents the growth scenarios in summary.

**Table 6.1:** The reasonable growth scenarios – summary

Scenario	Distribution	Total potential supply
1	Constant supply components	6,012
2	Constant supply components + Fairoaks	7,012

#### Appraisal methodology

6.1.2 Appraisal findings are presented across 13 sections below, with each dealing with a specific sustainability topic. Under each topic the aim is to: 1) rank the scenarios in order of preference; and 2) categorise the performance of each scenario in terms of significant effects (**red** / **amber** / **light green** / **green**).<sup>20</sup>

6.1.3 Further points on methodology

- Systematic appraisal – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within SEA Regulations (including Schedules 1 and 2), and the Planning Practice Guidance.
- Concise appraisal – every effort is made to predict effects accurately. However, this is inherently challenging given the high level nature of the scenarios, the wide ranging nature of issues / receptors and an understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inherently limited. There is a need to set out the thought process that leads to appraisal conclusions, but in doing so a balance must be struck with the objective of ensuring a concise and engaging appraisal.

### 6.2 Appraisal findings

The growth scenarios are appraised below under the 13 topic headings introduced in Section 3, before a final section presents summary findings.

#### Accessibility (to community infrastructure)

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
	2

6.2.1 Beginning with **Scenario 1**, the fact that the great majority of supply is from sites located within existing settlement boundaries serves to indicate a tendency towards relatively accessible locations; and there is a focus of growth at Camberley, which benefits from highest levels of accessibility.

6.2.2 Also, across the villages the primary focus of growth (both ‘new’ sites and in total) is at Bagshot, which benefits from a district centre and good public and active transport connectivity. N.B. there is also a focus of growth at Deepcut, where new community infrastructure is coming forward as part of the former Princess Royal Barracks strategic scheme ([Mindenhurst](#)), but this is mainly committed.

<sup>20</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.




- 6.2.3 However, there are several small sites within the CBGB and the Green Belt that are not adjacent to a settlement boundary, most notably sites at Deepcut, south of Bagshot and Site 834 between Lightwater and Windlesham, albeit these are small sites. Matters are explored further in Section 9.
- 6.2.4 With regards to **Scenario 2**, a primary consideration is that there would be the opportunity to deliver new community infrastructure alongside new housing, which is an opportunity to be realised as far as possible. This is one of the key reasons why there is support nationally for growth at scale, including garden villages; for example, paragraph 72(b) of the NPPF (2019) supports “larger scale development” provided:
- “... size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access”.*
- 6.2.5 There is a range of community infrastructure that can potentially be delivered alongside housing, ranging from lower order (e.g. a primary school) to higher order (e.g. a secondary school). New community infrastructure can potentially benefit the existing community.
- 6.2.6 In the case of Fairoaks GV, the proposal is for a relatively small scheme, in comparison to other garden villages nationally, and this reflects strongly on the potential community infrastructure ‘offer’. The current Vision Document states:
- “The scheme will be designed to enable a whole new way of life, one that’s sustainable, healthy, convenient and community focused. Fairoaks will be an exemplar development of the highest standards – a place where people genuinely want to live, work and play.”* It also proposes a “self-sufficient place where needs for work, leisure, living and social interaction are largely met on site.”
- 6.2.7 Specific proposals include:
- a 2 form entry primary school, with space to expand to 3 forms of entry in the future if required;
  - a local centre (co-located alongside the primary school) to include a community centre, community café, pub, flexible co-working space with hot desking provision and pick-up / drop off for online deliveries; and
  - a sports hub with multi-use playing pitches and a pavilion building.
- 6.2.8 However, it is important to question the extent to which ‘self-sufficiency’ (mentioned five times in the Vision Document) would be achieved. Whilst the nearest comparable scheme – Longcross GV – is of a very similar scale, it benefits from a rail station, which serves to reduce concerns regarding offsite trips (although concerns remain, as discussed further below). Other schemes tend to be larger, with a critical mass achieved that enables delivery of community infrastructure over-and-above that proposed for Fairoaks GV. For example, the committed Wisley Airfield scheme (c.2,000 homes), in Guildford Borough, is set to deliver a secondary school, whilst all three of the case-studies presented within the Fairoaks Vision Document involve significantly larger schemes, ranging from 2,500 homes to 3,600 homes.
- 6.2.9 Given that the scale of the scheme will undoubtedly limit self-sufficiency and trip internalisation, the next point to consider is links to offsite higher order community infrastructure, for example secondary schools. In broad terms, it is fair to highlight that the site benefits from close proximity to Woking town centre; however, there are a range of detailed matters that will require further investigation, most notably in respect of transport links (a focus of discussion below), but also in respect of existing community infrastructure capacity. There would be a need to work closely with Surrey County Council, Woking Borough Council and other partner organisations to consider matters relating to access to community infrastructure.
- 6.2.10 In **conclusion**, it is difficult to differentiate the two scenarios. Whilst Fairoaks would involve delivering a new community infrastructure alongside housing, the proposed scheme is small for a Garden Village, which limits the potential to achieve self-sufficiency, and there are issues with links to Woking.
- 6.2.11 In this light, there is a preference for Scenario 1. However, neutral effects are predicted for both scenarios, with the reasoning being: under Scenario 1, whilst a town centre focus that delivers regeneration is supported, the spatial strategy as a whole does not have a strong focus on delivering new community infrastructure, e.g. new schools capacity; whilst under Scenario 2 there are always accessibility arguments for directing growth to a new settlement, particularly if the alternative is pressure for piecemeal growth without a focus on delivering new infrastructure / planning gain.

## Air quality

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
	<b>2</b>

- 6.2.12 This is an important consideration locally, given a number of designated Air Quality Management Areas (AQMAs), notably affecting the centres (all outside of Surrey Heath Borough) of Knaphill, Woking and Addlestone (plus the M3 corridor through Camberley), albeit air quality is set to improve over coming years as the number of petrol and diesel vehicles on the road decreases. Moreover, there are potential impacts on the TBHSPA as a result of any additional vehicle movements in proximity to sensitive habitat (leading to nitrogen and ammonia deposition from vehicles), however this is covered under the biodiversity section.
- 6.2.13 Beginning with **Scenario 1**, the first point to note is that none of the proposed sites intersect an AQMA. However, several are in proximity to either the M3 or the A322 dual carriageway, which could suggest a risk of problematic air and/or noise pollution, plus there is a need to consider other potential pollution sources, including railway lines and employment uses.
- 6.2.14 With regards to the risk of growth leading to traffic through an AQMA, or otherwise exacerbating or creating problematic air and/or noise pollution, there are few concerns in light of Highways Assessment (2024). However, there will clearly be a need to ensure that a relatively high growth strategy for the western urban area does not lead to issues. Matters are explored further in Section 9.
- 6.2.15 With regards to **Scenario 2**, the Fairoaks Vision Document includes a section on air quality, but does not discuss nearby AQMAs, nor any other location specific issues or opportunities. The A319 is not constrained by any AQMA (although the road does pass through the centre of Chobham), nor is the A320 between Woking and the M25; however, a concern could potentially relate to journeys along the A320 that pass through the AQMA south of Woking.
- 6.2.16 Looking beyond designated AQMAs, it is noted that the effect of Runnymede Local Plan allocations on air quality along the A320 corridor was a focus of the Local Plan examination. Paragraph 278 of the Inspector’s Report concludes that mitigation measures will lead to an overall “neutral” impact; however, there is feasibly a risk of a higher growth scenario in the east of Surrey Heath leading to problematic air quality along the A320, e.g. affecting Ottershaw. Finally, it is noted that no air quality concerns were raised as part of the planning application process for a smaller (1,000 home) scheme at Fairoaks in 2019; however, the application was withdrawn (i.e. not determined) and situation may have changed since 2019.
- 6.2.17 In **conclusion**, it is fair to highlight a risk of impacts under Scenario 2 over-and-above Scenario 1, although concerns are of limited significance. Neutral effects are predicted for both scenarios.

## Biodiversity

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
	<b>2</b>

- 6.2.18 Biodiversity is a key issue in Surrey Heath, given the borough’s close association with the internationally important Thames Basin Heaths Special Protection Area (TBHSPA), alongside recognition of the role that functioning ecosystems play in respect of achieving wide ranging objectives, including climate resilience.
- 6.2.19 Beginning with **Scenario 1**, the first point to note is that whilst all proposed sites are beyond the 400m TBHSPA buffer zone, several are located not far beyond this zone. An avoidance and mitigation strategy is in place, as discussed in a stand-alone Habitats Regulations Assessment (HRA; including with reference in combination effects and latest proposals in respect of ensuring Suitable Alternative Natural Greenspace, SANG). However, there is a need for a watching brief, working in collaboration with Natural England.

- 6.2.20 Detailed discussion of wider issues in respect of Scenario 1 is presented in Section 9, including in respect of: one site in proximity to the nationally designated Basingstoke Canal SSSI, in the Deepcut sub-area;<sup>21</sup> sites in proximity to a locally designated Site of Nature Conservation Importance (SNCI), with attention again focusing on the Deepcut area (also Mytchett, which is associated with the Blackwater Valley); and sites with tree cover, including woodland priority habitat or a tree preservation order (TPO).
- 6.2.21 With regards to **Scenario 2**, the Vision Document includes a range of detailed proposals to avoid and mitigate the risk of impacts to nearby Horsell Common, which forms part of the TBHSPA, including a proposal to deliver a large SANG that will likely also be of a high quality (being associated with a river valley and a former parkland). On this basis, it should be possible to sufficiently mitigate recreational impacts on the TBHSPA, despite the close proximity (the site is just beyond the established 400m buffer).
- 6.2.22 There does also appear to be a good opportunity to deliver well-targeted new habitat creation onsite, including new wetland habitats within the river corridor and new heathland elsewhere, although habitat creation proposals warrant further detailed scrutiny, e.g. it seems potentially ambitious to suggest that new heathland will be created that is capable of supporting SPA qualifying bird populations.
- 6.2.23 However, concerns do remain regarding impacts to Horsell Common, given that pedestrians, cyclists and motorists moving between the site and Woking will need to pass through or adjacent to it. For example secondary school and sixth form / college students might drive, cycle or walk between the site and Woking on a daily basis. In turn, there could be a risk of impacts such as air pollution, disturbance, littering and wild fires. There could also be a risk of more direct impacts, given the possibility of “pedestrian/cycle works” within the SPA, to link the site to Woking. However, on the other hand, it is noted that the part of Horsell Common SSSI closest to Fairoaks was recently assigned ‘favourable’ condition status (having previously ‘unfavourable recovering’) and the new assessment notes: *“Most of the recreational pressure is focussed on the path network and there is little evidence of physical disturbance by trampling off of paths despite the high visitor numbers.”* These would be matters to explore further through HRA.
- 6.2.24 Also, a secondary concern is in respect of the north-eastern part of the proposed settlement area, which will impact on a significant area of land with a clear former parkland character, with mature tree belts / inter-linked copses and many individual mature trees. None of this woodland is locally designated (either by Surrey Heath or Runnymede), but much of it comprises priority habitat, one very small patch comprises ancient woodland, and there is a need to consider functional links with the extensive areas of woodland and parkland to the north of the A319, much of which is locally designated. It is clear that the proposed masterplan aims to avoid areas of greatest sensitivity, and the Vision Document proposes *“reinforcing existing natural features such as trees and hedgerows”*, however, a degree of concern does remain, and it is noted that the Woodland Trust raised detailed concerns as part of the planning application process for a proposed smaller scheme in 2019 (ref. [18/0642](#)). Given these concerns, there is a need to scrutinise the suggestion made within the Vision Document that habitat creation onsite will serve to enhance the function of the site as a ‘stepping stone’ within the wider landscape, e.g. helping to ensure ecologically connectivity between Chobham Common and Horsell Common.
- 6.2.25 Overall, the suggestion that the scheme would result in an “a major positive effect” on the SPA must be challenged. It is recognised that the new strategic SANG will not only draw new residents away from the SPA, but also existing residents of nearby communities, *possibly* leading to a net benefit in terms of recreational pressure; however, there are a range of other important considerations that must feed into an overall conclusion regarding net biodiversity impacts / extent of biodiversity net gain.
- 6.2.26 In **conclusion**, there is an inherent concern with the higher growth scenario given the sensitive nature of the borough as a whole, and concerns crystallise once consideration is given to the specific sites that, it is assumed, would be supported in order to deliver higher growth. Summarising in turn:
- Scenario 1 – there are concerns with a number of sites, including sites in proximity to the TBHSPA (albeit beyond 400m), Basingstoke Canal SSSI and SNCIs, and a number of sites intersect woodland or significant onsite trees. Few concerns were raised through the consultation in 2022, and there also a number of site specific opportunities, but at this stage it is appropriate to flag a possible negative effect.
  - Scenario 2 – no concerns were raised through the consultation in 2022, and the potential (both inherent to all strategic sites and specific to Fairoaks) to deliver strategic targeted enhancements is recognised. However, there is uncertainty around risks to the TBHSPA and so it is appropriate to flag a risk.

<sup>21</sup> N.B. all SPAs are also nationally designated as SSSIs, e.g. Chobham Common’s SSSI citation and status summary is [here](#).

### Climate change adaptation

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
★ 1	★ 1

- 6.2.27 The primary consideration here is flood risk, with other climate change adaptation considerations (see discussion in [Appendix 1](#) of the Climate Change Study, 2020) considered under other topic headings.
- 6.2.28 With regards to **Scenario 1**, a number of sites intersect the flood risk zone, as discussed in Section 5.4, namely sites at Bagshot, Chobham, Mychett, West End and Windlesham. For example, Site 912 at Mychett significantly intersects flood zone three, albeit the proposed capacity (16 homes) amounts to a low density (10.7 dph), hence it may be possible to avoid development in the most problematic parts of the site. However, all of these sites are unchanged since the Environment Agency was consulted in 2022 (indeed, at one of the sites, namely a small site at Windlesham, the site capacity is now reduced).
- 6.2.29 A further consideration is surface water flood risk, with the primary consideration potentially surface water flood risk affecting Camberley town centre and land adjacent to the railway line that passes through the wider urban area. Another flood risk consideration can be development leading to increased surface water run-off and, in turn, increased downstream flood risk, but it is difficult to reach strong conclusions given potential to deliver sustainable drainage systems (SuDS). See further discussion in Section 9.
- 6.2.30 With regards to **Scenario 2**, the site is associated with the valley of the River Bourne and, correspondingly, there are several significant corridors of flood risk, where residential uses should be avoided, also mindful of expanded flood risk zones due to climate change. There is likely good potential to avoid and buffer flood risk zones; however, the current masterplan shows housing in very close proximity to current flood risk zone 2, which could warrant further attention (it is noted that *“a detailed flood risk model was agreed with the Environment Agency as part of the previous planning application”*).
- 6.2.31 The current masterplan also shows a series of small water attenuation areas between the southern boundary of the proposed settlement and the River Bourne, and states that there will be the potential for *“flood risk and river quality improvements”*. Furthermore, through correspondence with the site promoters, it was confirmed that work completed in 2019 (as part of a planning application for a 1,000 home scheme) demonstrated *“a substantial betterment beyond the required greenfield runoff rate and volume performance of the site”*. However, there will be a need to scrutinise the level of ambition, ensuring that opportunities are taken to minimise and potentially reduce existing down-stream flood risk, noting areas within Addlestone that are affected by flood risk, and noting NPPF support for *“natural flood management”*.
- 6.2.32 In **conclusion**, at this stage, it is appropriate to flag a degree of concern with both scenarios:
- Scenario 1 – whilst the EA was consulted in 2022, and few if any significant changes have since been made that might lead to added flood risk concern, there is a clear need for ongoing scrutiny.
  - Scenario 2 – Fairoaks is strongly associated with a river corridor, but there is likely good potential to avoid development in the flood risk zone, and the potential for strategic flood water attenuation measures, to the benefit of locations downstream that experience flood risk, can be envisaged.

### Climate change mitigation

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
★ 1	2

- 6.2.33 The primary consideration here is per capita built environment emissions, given the potential to cover matters relating to transport emissions under other topic headings.

- 6.2.34 **Strategic growth locations** can give rise to an opportunity over-and-above smaller developments, given economies of scale and also the possibility of delivering a mix of uses onsite, which can feasibly support one or more heat networks. Strategic growth locations can also give rise to an opportunity to deliver high quality electric vehicle charging (see discussion in [Section 5](#) of the Climate Change Study), and potentially 'smart energy systems' that link heat networks / heat pumps, solar PV, power consumers and battery storage. Also, it is simply the case that large sites will generate a high degree of attention and scrutiny, and housebuilders will often be keen to demonstrate good practice or even exemplar development.
- 6.2.35 However, the relationship between scale and decarbonisation opportunity is not clear-cut, e.g. because large sites often have to deliver costly infrastructure. Also, heat networks are technically challenging to deliver, and practice is not well advanced nationally, with a clear opportunity currently only seen to exist where there is very high density development and/or a good mix of uses (to allow heat to be shared across the course of the day) and/or a source of waste or ambient heat that can be sourced (e.g. a watercourse).
- 6.2.36 A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong **viability**, with a view to ensuring funding for decarbonisation measures and potentially delivering net zero development (recognising competing funding priorities).

**Box 6.1: Defining net zero development**


Another important consideration is around ensuring that 'net zero development' is carefully defined. There are perhaps three key points to make. Firstly, any approach to net zero development must align with the energy hierarchy, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. Secondly, there are two broad approaches to calculating net zero and evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an energy-based approach. The two approaches are compared and contrasted in a recent report [here](#).<sup>22</sup> Thirdly, it is important to be clear that the focus of discussion above is in respect of 'operational' energy/carbon, i.e. the energy used / carbon emitted as a result of the development's occupation / use. Additionally, there is a (crucially important) need to consider the 'whole life cycle' of a development, to include to the emissions associated with construction, maintenance, retrofitting and demolition (often referred to simply 'embodied' carbon or emissions).

- 6.2.37 In light of these points, there is potentially an opportunity associated with the high growth strategy for Camberley town centre (**Scenario 1**), which the Climate Change Study suggests is potentially a "once in a century opportunity". However, it is noted that there has been significant work since the Regulation 18 stage to explore viability challenges associated with the two key strategic development sites.
- 6.2.38 With regards to higher growth via a new settlement (**Scenario 2**), in theory this represents a decarbonisation opportunity, including because of strong development viability in the east of the borough.
- 6.2.39 However, it is not clear that there are any particular locational opportunities, nor is it clear that minimising built environment emissions is set to be a major focus as part of masterplanning or when making decisions in respect of funding priorities. There is a high-level commitment to "*use of sustainable construction materials*", but little beyond this, with other statements non-committal. For example a submitted Climate Change note says nothing about operational emissions other than: "*Fairoaks will explore where it is viable to go beyond building regulations*". Also, the following statement does not inspire confidence: "*Fairoaks will review the feasibility to connect to existing or develop new heat network, including the opportunity for fifth generation heat networks*." Outside of urban areas heat network opportunities are likely to be strongly associated with locationally specific opportunities to utilise a source of waste or ambient heat.
- 6.2.40 In **conclusion**, whilst there is much uncertainty at the current time, on balance it is appropriate to conclude a preference for Scenario 1 over Scenario 2, primarily on account of limited evidence to suggest that Fairoaks Garden Village would represent an opportunity to minimise per capita built environment emissions in Surrey Heath, but also noting a concern around per capita transport emissions.

<sup>22</sup> Under the Building Regulations methodology the question for any given planning application is the extent to which the development can improve on a Target Emissions Rate (TER), measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m2/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter. However, on 13th December 2023 a Written Ministerial Statement was released which appears to prohibit its use in local plans.

6.2.41 With regards to significant effects, on one hand decarbonisation is a clear national and local priority; however, on the other hand, it is a global issue such that local actions can only have limited impact. With regards to the [local net zero target](#), this is set at 2050, as per the national target, but there is an aspiration to achieve net zero by 2030. This will be extremely challenging, and clearly points to a need for net zero to be a matter of overriding importance as part of work in respect of spatial strategy and site selection through the Local Plan. Having accounted for the stretching nature of the borough’s aspirational decarbonisation trajectory, there is a need to flag a negative effect of ‘limited or uncertain’ significance.

## Communities

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
2	1 

6.2.42 Aside from matters relating to access to community infrastructure, which have been discussed above, there are wide ranging other ‘communities’ related considerations that must feed into decisions around spatial strategy and site selection, including around ensuring good health, which is a national priority at the current time. With regards to the package of sites that are a ‘constant’ across the growth scenarios (**Scenario 1**), matters are considered in detail in Section 9, but headline considerations include:

- Camberley town centre – in comparison to the proposal in 2018, the proposal is now to follow an ambitious approach to redevelopment at the two largest town centre allocations, namely London Road Regeneration Block (proposed for 336 homes in 2018, now proposed for 550 homes (gross)) and Land East of Knoll Road (100 homes in 2018, now 340 homes), plus Camberley Station (60 homes in 2018, now 150 homes). There is a major opportunity to regenerate and reimagine the town centre as a location to ‘live work and play’ as well as a hub for retail and services/facilities. However, there is also a need to strike a balance, ensuring that the retail and community hub function is not unduly eroded. There is also a need to consider density from a design, place-making and health / wellbeing perspective, including in respect of enabling good light and access to green space, which is at a premium in the town centre. In this respect, protecting and enhancing green space at Knoll Road is a key consideration.
- Existing uses – a primary consideration is land east of Knoll road, which includes Camberley Library (and the Council offices). There are also a number of other community uses associated with buildings adjacent to the south, which were previously discussed in 2022 as suitably for redevelopment beyond the plan period; however, this is no longer the proposal at the current time. Also, the Camberley Centre is a proposed allocation for 35 homes close to the town centre, and another site of note is Chobham Rugby Club. In all instances the proposal is to reprovide existing facilities within the borough.
- Access to green space – a high growth strategy for Camberley town centre and the wider urban area must deliver accessible green space to support the increased population. Elsewhere, there is a need to consider whether growth might support enhanced access to the countryside and wooded areas.

For example, there is a focus of growth adjacent to a stretch of the Basingstoke canal where there is currently no public right of way, and there might be a focus on increasing accessibility to the countryside to the east of West End and/or Windlesham, where there is a low density of public rights of way.

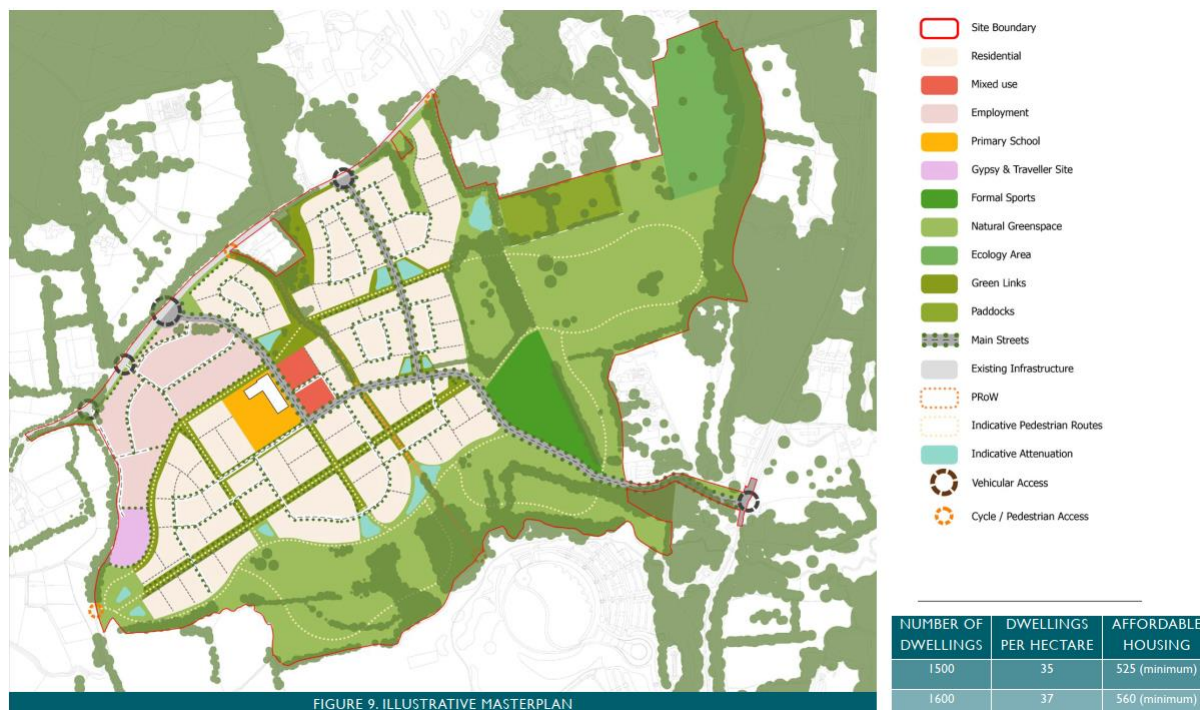
- Sites outside of settlement boundaries – several small sites are identified as deliverable or developable by the SLAA that would be located outside of a defined settlement boundary, including to the south of Bagshot, to the south of Chobham, at Deepcut and between Windlesham and Lightwater.
- Play facilities – there is a need to consider whether proposed sites are of a scale whereby there is the ability to deliver new play facilities onsite, as part of a framework of green and open space.

6.2.43 With regards to **Scenario 2**, Fairoaks performs well, for three reasons.

- Firstly, the site is remote from existing settlements, hence there are limited concern around impacts to communities, e.g. construction-related or due to pressure on community infrastructure, albeit there would still be concerns regarding traffic impacts on existing communities.

- Secondly, as a strategic scale scheme there is an opportunity to deliver new community infrastructure alongside housing (as discussed) and the characteristics of the site may suggest a particular place-making opportunity, noting the river valley location and the potential to integrate with a parkland.
- Thirdly, the proposed approach of Countryside acting as Master Developer is of note.<sup>23</sup>

Figure 6.1: Fairoaks Garden Village concept masterplan submitted by the site promoters in 2022



6.2.44 The current proposal is for 35 dph within the built part of the site, which is quite high in the Surrey Heath context, but serves to highlight what can be achieved at strategic-scale schemes. The site promoters highlight that there is national support for garden villages as small as 1,500 homes and propose a new community “small enough for any place within it to be in easy walking distance of any other, but large enough to support a wide range of activities and facilities [to] give it life and prosperity.”

6.2.45 The site promoters also notably commit to “a dedicated website, interactive ‘Smartphone App’, and... interactive information points... to inform people about: Community events, entertainment and sporting activities and religious venues; Important community meetings; Local health centres, schools, and further education opportunities; Job opportunities; Local markets and lists of local traders and restaurants; and Transport pick up points and details about dial-a-ride / demand responsive transport services.”

6.2.46 However, there is a need to question whether the issues and constraints affecting the site could limit the potential to deliver the required number of homes alongside generous green infrastructure permeating through the settlement area. Whilst there would certainly be good access to a large and high quality SANG, there is also a need to consider access to gardens and doorstep greenspace and, furthermore, green infrastructure will need to act to separate the scheme into distinct neighbourhoods. Two of the three good practice case-studies presented within the Vision Document emphasise the importance of having achieved individual integrated neighbourhoods, yet how this would be achieved at Fairoaks GV is not a focus of the Vision Document. Through correspondence the site promoters further explained:

<sup>23</sup> A Master Developer takes responsibility for obtaining planning and delivering infrastructure before marketing fully serviced land parcels to housebuilders. The Fairoaks site promoters explain: “Successful Master Developers adhere to a vision and set of design principles for the duration of a project. Whilst these evolve over time, it is this long-term commitment and visibility that sets Master Developers apart... As Master Developer, Countryside is responsible for securing planning consent and deliver strategic infrastructure, landscaping, new homes, and community and mixed-use facilities in a coherent manner. At Fairoaks Garden Village this will be key to achieving desirable delivery rates, placemaking, quality and legacy.”

*“Within the development blocks and streets (the ‘core’ of the scheme), approximately 10 hectares of Green corridors and Pocket park spaces are proposed. If other important ‘day to day’ elements that allow for circular walks and informal recreation along the southern and eastern boundaries of the ‘built part’ are included (i.e. a semi-natural landscape typology in a corridor of say 25-50m width) this would add a further c.10 hectares. The formal sports provision to the south-east corner also adds a further 5 hectares, equating to a total area of green infrastructure within the ‘built part’ of the site of 25 hectares, out of a total of 90 hectares proposed across the whole red line boundary...*

*... a series of linked green spaces will be provided and inter-woven through the built form. This will include children’s equipped play areas and accessible natural green space. These areas will ensure outdoor spaces become hubs for community integration and engagement... The character of the Green corridors will be formal in style with feature trees and linear planting with development set back either side. As you travel through the development the character of these corridors will change to mark distinct neighbourhoods, with subtle variations... to ensure the creation of ‘one community’... Contained within the green corridors will be new footway and cycle way links with safe and logical desire lines into the country park, wider landscape, and development parcels. It will be essential to provide interest and variation along these routes with opportunities for specimen trees varied amenity planting and play.”*

6.2.47 In **conclusion**, there is potentially a significant place-making opportunity associated with supporting a new garden village at Fair Oaks (Scenario 2), although there are a range of uncertainties ahead of detailed work on masterplanning, viability etc. With regards to Scenario 1, there are a range of detailed considerations, but an overriding consideration is that the regeneration of Camberley town centre represents a significant place-making opportunity, including the creation of two new residential ‘quarters’ with the re-provision of new, upgraded and more accessible community facilities.

### Economy and employment

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fair Oaks GV
	

6.2.48 As discussed in Box 5.2, under **Scenario 1** there would not be any allocation of new employment land, but there is confidence in the ability to provide for employment land needs over the course of the plan period in total quantitative terms, and there are no clear concerns in respect of not being able to provide for any specific employment land needs (i.e. concerns in respect of ‘qualitative’ considerations). Also, there is clear support for regeneration of Camberley town centre because, as discussed, it is a sub-regionally important hub of economic activity. Matters are discussed further in Section 9.

6.2.49 With regards to **Scenario 2**, the scheme would deliver new employment land to expand an existing employment location. However, the strategic importance of employment growth at this location is not entirely clear at the current time, given the rural location and the lack of identified need at the borough-scale. Also, some existing manufacturing and aeronautical businesses on-site might not be compatible with nearby homes. The site promoters suggest: *“Only 6 of the existing 59 businesses require the use of the airport or runway... The existing employment buildings will be renovated and redeveloped to suit modern ways of working and meet the future needs of both existing and new occupiers.”* However, through the previous planning application process there was considerable discussion around the economic importance of the current airport use.

6.2.50 Another consideration is the discussion of film studios in the Employment Land Technical Paper (2023), which concludes: *“It is therefore reasonable to suggest that there will be demand for both supply chain, spin off and potential film studio demand in Surrey including in Surrey Heath.”* There are already some film studio uses at Fair Oaks, and hence there could be an opportunity to support further such uses, linking well to existing film studios at Longcross to the north and elsewhere to the west of London.

6.2.51 Further evidence comes from the Employment Supply Assessment (2023), which concludes:



“Fairoaks Airport is in a rural location, not within walking distance of retail uses or services. Strategic connections are accessed via the A319. Some of the building stock is dated and in need of refurbishment. However, this hasn’t impacted majorly on occupancy rates, as all industrial and warehouse units are currently let... A notable number of the occupiers are aviation related, including high profile companies such as... These aviation and specialist engineering uses align with the Functional Economic Market Area’s core growth sectors. There are also a cluster of SMEs that contain uses unrelated to the airport... Chobham Business Centre contains a range of uses, including a training centre, transport and distribution companies, trade counter suppliers and a utility company. Although the site and units are of relatively poor quality and in need of refurbishment occupancy rates are generally high, with [only] a relatively small amount of office space within the Chobham Business Centre [vacant].

6.2.52 In **conclusion**, the strategy under Scenario 1 should provide for needs in full. However, given that the strategy involves reliance on intensification within existing sites, rather than any new allocations, it is fair to predict a neutral effect. With regards to Scenario 2, whilst the scheme would deliver new employment land to expand an existing employment area, the strategic case for this appears limited.

### Historic environment

Growth scenario 1 Constant supply components	Growth scenario 2 Constant supply components + Fairoaks GV
	<p>2</p>

6.2.53 With regards to **Scenario 1**, Camberley town centre is notable for being associated with limited historic environment constraint; however, there are a range of other issues and sensitivities associated with the package of allocations and other SLAA sites, including: one site for 21 homes adjacent to the Basingstoke Canal, which is a designated conservation area; support for a 15 home scheme adjacent to the southern extent of Chobham Conservation Area, where there are several listed buildings; and support for further expansion to the east of West End, where there is a historic farm associated with two listed buildings. There are also several sites associated with locally listed buildings, including at of Bagshot.

6.2.54 With regards to **Scenario 2**, the Fairoaks Vision Document presents fairly detailed analysis, and it seems clear that whilst the site is not without its constraints, there would be good potential to avoid and mitigate impacts through masterplanning, landscaping and design. Key considerations relate to the concentration of heritage assets associated with the historic airfield use, the river valley and Ottershaw Park.

6.2.55 A primary concern is around encroachment of the proposed settlement area on the north-western sector of the parkland, as per the discussion above under Biodiversity. The Vision Document states: “*Delivery of the substantial SANG also provides an opportunity to enhance the historic landscape of the nearby Grade II Listed Ottershaw Mansion.*” However, there is a need to scrutinise this suggestion, mindful that there will be negative impacts to the western extent of the landscape. The site promoters explain:

“... key remnant landscape features associated Ottershaw Park are retained and incorporated into the proposals, in particular the woodland and Little Blackmole Pond on the eastern boundary, Samson’s Wood and Long Copse, the parkland trees, and the remaining field divisions within the eastern part of the Site.”

6.2.56 A final consideration is offsite impacts due to traffic and required road infrastructure upgrades, and in this respect significant concerns were raised through the previous planning application, particularly required junction upgrades in the Chobham Conservation Area.

6.2.57 In **conclusion**, it is fair to highlight a concern with Scenario 2 over-and-above Scenario 1. However, this is potentially quite marginal. The views of Historic England are sought on this matter.

6.2.58 With regards to significant effects, there are relatively few concerns to historic centres or listed assets, in the context of local plan-making in Surrey and the wider South East. This suggests the potential to conclude a positive effect on the baseline, recognising that the baseline situation is one whereby development comes forward in a less plan-led manner, but on balance neutral effects are predicted ahead of giving consideration to development management policies below.

## Housing

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
2	

- 6.2.59 As discussed in Section 5.5, under Scenario 1 provision would be made for housing need in full over a plan period to 2038 (see discussion of the plan period in Section 2.3) and once account is taken of a proportion of the supply coming forward in Hart District.
- 6.2.60 Under Scenario 2 a boost to supply in the latter years of the plan period to 2038 could enable:
- A larger ‘supply buffer’, such that the plan is more resilient to delivery issues (i.e. reduced risk of having to rely upon the presumption in favour of sustainable development to boost housing). However it is recognised that new settlements are inherently associated with a degree of delivery risk; and/or
  - A modestly increased housing requirement, which would be a positive step in terms of seeking to provide for affordable housing needs, albeit the LHNA (2024) is clear that there is no “requirement” to provide for a level of housing above the figure derived from the Government’s standard method to reflect affordable housing needs. Also, it is important to be clear that affordable housing need is concentrated in the western urban area (see Figure P in Appendix II), which is somewhat distant from Fairoaks.
- 6.2.61 It is also fair to say that additional market housing could potentially be a positive step, from a ‘housing’ perspective, in light of the discussion within the LHNA regarding recent population projections.
- 6.2.62 Finally, there is the matter of unmet need from Surrey Heath being provided for in Hart District, which is not ideal from a ‘housing’ perspective (including given growth locations in Hart, which are somewhat distant from Surrey Heath). However, Fairoaks would deliver later in the plan period, whilst Hart is providing for unmet need only until 2032, so this is not a factor in support of Scenario 2. It is important to be clear that both growth scenarios are presented on the basis of a housing requirement that takes account of 533 dwellings of Surrey Heath’s unmet housing need being delivered in Hart.
- 6.2.63 The points above do suggest a ‘housing’ case for supporting Scenario 2. Also see further discussion of planning for affordable housing needs in Box 6.1.
- 6.2.64 Other points to note regarding Fairoaks GV relate to:
- Delivery certainty – the current Fairoaks Vision Document goes into detail on the anticipated delivery timeline and, as per the finding of the Runnymede Local Plan Inspector in respect of Longross GV (paragraph 122 of the Inspector’s Report, 2020), it is fair to say that *“there are several positive factors that support this trajectory in principle”*, including *“the substantial experience of the developer in delivering large-scale projects and the attractiveness of the vision for the Garden Village”*. Also, the proposed approach of Countryside acting as Master Developer (discussed above under Communities) is supported from a delivery perspective. Wisley Airfield, to the south of Woking, is an example of a new settlement that has faced significant delivery challenges, but Fairoaks *may* give rise to fewer concerns.
  - Gypsies and Travellers – this is an important consideration, in light of the proposed significant supply shortfall, as measured against identified need, under Scenario 1. At Fairoaks the proposed concept masterplan includes land for 12 Gypsy and Traveller pitches. However, there would be a need for further work to confirm suitability and confirm that pitches would be delivered in practice. Also, it is relevant to note that pitches may be delivered in the long term, such that there would not be any contribution towards meeting needs in the short term, which is when needs are greatest.
- 6.2.65 In **conclusion**, positive effects are predicted for both scenarios, but there is support for Scenario 2 over Scenario 1 from a ‘housing’ perspective, particularly because a boost to housing supply could help with meeting affordable housing needs (assuming it translates into an increased housing requirement). Also, Scenario 2 could boost delivery of new Gypsy and Traveller pitches in the long term, which is supported, given the extent of existing needs, albeit these are most pressing in the short term.

**Box 6.1: The complex relationship between affordable housing needs and the housing requirement**

As discussed, affordable housing needs are potentially a factor in support of a higher housing requirement. Also, there is a need to consider:

- Recent affordable housing delivery – as understood from Authority Monitoring Reports (as follows: 2019/20: 35.1%; 2020/21: 11.1%; 2021/22: 17%; 2022/23: 17%. N.B. there is also a need to factor-in tenure split.
- The Local Plan Viability Assessment (2023) – is discussed in Section 5.2 as flagging challenges in respect of delivering a high proportion of affordable housing at certain sites in the urban area
- Recent experience at key sites – notably: Sturt Road (ref. 20/1048/FFU), which is set to provide up to 9.4% (discounted market housing), and this figure remains subject to adjustment pending further investigations on the cost of drainage solutions (and the scheme is not able to make an education contribution); and Princess Royal Barracks (a key strategic site, but subject to constraints given former MOD uses), which will deliver 20% overall, with the outstanding Reserved Matters applications to deliver 15%.
- Prior notifications for the conversion of offices to residential –are not required to provide affordable housing.

The question of whether it is appropriate to consider setting the housing requirement at a figure above standard method derived LHN to reflect affordable housing needs is a live matter of debate nationally at the current time.

For example, an Inspector recently posed the following question:

*“National planning guidance advises that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes... What consideration was given to increasing the Plan’s housing requirement in order to help deliver the number of affordable homes... identified as being needed?”*

Also, the same question was considered recently by the Fareham Local Plan Inspector – see para 188 here. The Inspector concluded no need for an ‘uplift’ on account of affordable housing needs; *however*, this was in the context of affordable housing need amounting to only 30% of standard method LHN, as explained here.

The question of ‘uplifting’ to reflect affordable housing needs is ultimately very complex, including because there is a need to avoid setting a housing requirement that is not delivered in practice (i.e. leading to a risk of failing the Housing Delivery Test, with resulting punitive measures – see NPPF paragraph 11).

For example, a Housing Needs Assessment for another part of the country recently explained:

*“Meeting the annual need for 2,412 affordable homes would... notionally require provision for as many as 7,937 dwellings per annum... with this evidently exceeding the need for 4,691 dwellings per annum suggested by the standard method. There is, however, widely acknowledged to be **a complex relationship between market and affordable housing**... It is ultimately for the Councils to consider whether higher housing requirements could help to increase the delivery of affordable housing, which is evidently needed...”*

Another recent example is a similar assessment for Coventry (July 2023), which explains:

*“In setting housing targets in individual local plans, the affordable housing evidence is also relevant. In the northern part of the sub-region in particular... this supports the case for considering, as part of the plan-making process, higher housing provision than [LHN] in order to boost the delivery of affordable housing.”*

Finally, the West Berkshire Inspector recently explained:

*“... policy SP19 is expected to deliver a total of 2,190 affordable homes on market-led schemes between 2022 and 2039. There would be a nominal deficit of around 3,420 against the identified need for 5,610 affordable homes in that period although the link between affordable and overall need is complex as many of those identified as being in need of an affordable home are already in housing.”*

The Inspector then poses the question:

*“should the minimum housing requirement figure be increased above local housing need to... deliver more affordable homes?”*

## Land, soils and resources

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
★ 1	★ 1

- 6.2.66 Beginning with **Scenario 1**, the proposed strategy is largely focused on previously developed land, and hence performs well. Several sites are greenfield, as discussed, but there are few concerns around loss of productive agricultural land (which is unusual or perhaps even unique in the Surrey context). Other sites comprise the ground / curtilage of existing buildings in large plots. See discussion in Section 9.
- 6.2.67 With regards to **Scenario 2**, the current Fairoaks Vision Document states that the part of the site (42% of the total area) that comprises open fields has been surveyed in detail and found to comprise grade 3b quality land, i.e. land that does not qualify as best and most versatile (BMV). It is noted that there is BMV land near adjacent to the site (including Grade 1 land), and so the site promoters might wish to publish the data on [magic.gov.uk](http://magic.gov.uk) in order to confirm the situation.
- 6.2.68 Regardless, a benefit of the Fairoaks GV scheme would be that some use would be made of previously developed land, with the site promoters suggesting that all of the land currently associated with the operational uses of the airport, including extensive areas of grassland either side of the runway, can be classified as previously developed. The NPPF definition is [here](#), and the site promoters suggest:
- “... the managed mown grassland surrounding the runways supports the functioning and operational activities of the airfield and runway and therefore prohibits agricultural use. It is classified as previously developed land alongside the buildings, airstrip, tarmac. This is established in the case of Dunsfold Aerodrome... where the Inspector confirmed that 83% of the Dunsfold was previously developed.”*
- 6.2.69 In **conclusion**, both Scenarios 1 and 2 perform notably well from a perspective of making good use of previously developed land and avoiding loss of BMV agricultural land.


## Landscape

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
★ 1	2

- 6.2.70 Beginning with **Scenario 1**, a range of relevant considerations have already been explored. The borough benefits from extensive woodland and forestry, which serves to screen and contain growth locations in the landscape and leads to relatively limited concerns regarding piecemeal expansion or ‘sprawl’ over time.
- 6.2.71 For example, and notably, further expansion to the east of West End would be well contained by woodland (and the boundary of the Green Belt). The SLAA identifies three small sites in the Green Belt that are less well contained in landscape terms, but the Green Belt designation should serve to ensure that development does not impact on openness, and also negate any risk of problematic long term development creep. Also, a small SLAA site at Mytchett appears to be associated with an open river valley landscape, but it is not clear that there are any sensitive public view points into or across the site, and the scheme would be contained by the flood zone.
- 6.2.72 With regards to **Scenario 2**, the first point to note is that there is a need for further work to understand the contribution that the site currently makes to Green Belt purposes. However, leaving aside Green Belt, there are reasons to suggest that supporting growth here may give rise to relatively limited landscape concerns in the context of a constrained sub-region.

- 6.2.73 The landscape merit of the site relates to the fact that it is currently an operational airfield and, whilst most airfields tend to be located on raised plateaus (e.g. Wisley), Fair Oaks is located within a river valley landscape. This should help in terms of minimising views into and across the site, and also suggests good potential for containment in the long-term, i.e. low risk of problematic ‘sprawl’. Looking more closely at the site, it does appear to be very well contained in the river valley landscape, with good potential for containment: to the west by the flood risk zone; to the north by the A319, rising land and biodiversity constraint; to the east by SANG; and to the south by SANG / flood risk zone / SPA constraint.
- 6.2.74 Views across the site from the A319 and from two public rights of way that link Chobham Common to the north with Horsell Common to the south (and hence are likely to be of some strategic importance) are a further consideration, but likely to be of limited significance.
- 6.2.75 The other key consideration is the potential to greatly improve accessibility to the River Bourne valley (there is currently no footpath following the river here, unlike to the west, between the site and Chobham, hence the possibility of a coordinated landscape scale enhancement programme might be envisaged) and the remnant parkland landscapes of Ottershaw Park, where there are currently no public rights of way.
- 6.2.76 Returning to Green Belt, the site promoters emphasise that *“the NPPF, case law and Inspector’s Reports... demonstrate Green Belt sites are not to be considered as a ‘last resort’ if they achieve sustainable development.”* However, equally, paragraph 146 of the NPPF is clear 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...”*
- 6.2.77 In **conclusion**, it is certainly fair to highlight a not insignificant concern with Scenario 2 over-and-above Scenario 1, noting the Green Belt constraint (Green Belt is not a landscape designation, but is valued for its openness) and some (albeit limited) wider concerns around impacts to landscapes that are likely to be associated with a degree of sensitivity. However, few if any concerns were raised through the Draft Plan consultation in 2022, despite Fair Oaks GV being presented clearly as an option for the plan.

## Transport

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fair Oaks GV
	2

- 6.2.78 Beginning with **Scenario 1**, there is much to commend the proposed approach to distribution from a transport perspective, as discussed above, and as discussed below, within Section 9, including detailed discussion regarding the Highways Assessment (2024).
- 6.2.79 With regards to **Scenario 2**, a key consideration is thought likely to be the A320 corridor between Woking and M25 Junction 11, which is a focus of the adopted Runnymede Local Plan and the Local Plan Inspector’s Report. There are plans for significant enhancements to the road corridor; however, there is a need to establish whether these will lead to any spare capacity over-and-above that needed to accommodate committed growth within the Runnymede Local Plan and elsewhere.
- 6.2.80 There would certainly be a need for detailed investigations, potentially of a similar nature to that undertaken for the Runnymede Local Plan prior to support for Longcross GV (and other allocations along the A320) being confirmed. The Inspector’s report refers to the importance of *“a robust, comprehensive and transparent evidence base for the Plan”*, and the following statements are also of note:
 

*“The Plan’s implications for traffic growth and highway safety on the A320 and on the M25 have been thoroughly assessed, together with the necessary mitigation measures, so far as... is reasonable...”*

*“A revised trajectory for housing delivery at LGV was considered at the hearing in... taking account of the updated evidence on the improvements required on the A320 corridor and at junction 11 of the M25.”*
- 6.2.81 Other key matters for scrutiny are impacts to the A319 corridor, the proposed A319/A320 link road through the site, potential for trip-internalisation, public transport connectivity and offsite walking/cycling links.

6.2.82 In respect of public transport, there is a need to recall NPPF paragraph 147, which requires a focus on this matter when considering Green Belt release. There could well be an opportunity to enhance bus connectivity locally, with the suggesting that *“the ability to integrate services with Chobham, St Peter’s Hospital and Woking should aid delivery.”* The promoters also suggest that *“using a methodology that has been agreed with Surrey Council... officers elsewhere, it has been shown that it would be financially viable to divert Route 446 through the site whilst at the same time increasing its frequency to at least 20 minutes.”*

6.2.83 With regards to walking/cycling links, this is a major focus of the Fair Oaks Vision Document, and it is fair to assume that support for a strategic growth location will lead to opportunities to support walking/cycling (also micro-mobility, ‘mobility as a service’ etc). Materials submitted to date do include fairly detailed commitments in respect of onsite mobility aspirations, explaining:

*“In short, these are perhaps best described by the emerging theory of the Sustainable Accessibility and Mobility (SAM) framework... Although important to note the SAM model is a decision-making hierarchy for transport planning and land use, physical infrastructure also includes: Co-working space as part of the local centre; Car and cycle share options; A focal point for public transit options; Infrastructure that encourages and facilitates the use of alternative fuel technology (i.e. EV charging points); Dedicated website; Interactive ‘Smartphone App’; and Conveniently located interactive information points.”*

6.2.84 Proximity to Woking is a clear benefit, and the site promoters explain:

*“The existing services and amenities of the town would be well connected to Fair Oaks, which in spatial terms could be termed as a satellite settlement to Woking... The town is a key service centre with a station offering mainline railway services, leisure, community, employment uses and [is] the second largest shopping centre in Surrey after Guildford.”*

6.2.85 However, there is a concern regarding the potential to achieve good walking/cycling links between the site and Woking. The site promoters highlight that a National Cycle Route follows the A320, and that this is set to be [upgraded](#); however, it is not clear that this is a direct route from the settlement area unless a link is created via the northeast corner of Horsell Common, and there could be a desire line via the Common.

6.2.86 With regards to EV charging infrastructure, the site promoters commit to: *“ensuring an EV charging point is available for each home and an installation of community EV charging points in key locations.”* N.B. EV charging points are set to become a requirement of all new homes nationally.

6.2.87 Finally, the Council’s Highways Assessment (2024) which includes a sensitivity examining Fair Oaks, and concludes [emphasis added]:

*“This report presents a sensitivity test which... compares the Local Plan Do Something scenario with the addition of development at Fair Oaks Airport for the forecast year 2038.*

*The additional vehicle trips arising from an assumed gross of 1,000 dwellings and... commercial use for the Fair Oaks Airport site, **does present a notable impact** on the highway network. Where the site connects to the network at the A320 and A319 there is between 600 and 800 vehicles at each location both departing and accessing Fair Oaks Airport site during the weekday AM and PM peak hours.*

*The link analysis suggests that this impacts both A320 and A319 routes and surrounding areas which provide access to the Fair Oaks site. Development traffic using the A319 predominantly travel to and from feed in from Chobham, Burrowhill, Windlesham and Sunningdale. This sees large increases on such key roads as the B386 Kennel Lane, B383 Windsor Road, Woodslane Lane and Windlesham Road.*

*The impact on the A320 meanwhile sees increases in flow towards and from Ottershaw...*

*The impact to junction delay from the addition of development at Fair Oaks Airport is **considerable**, affecting a relatively large number of junctions across a wide geographical area. The model indicates 30 junctions in the AM peak hour and 9 in the PM peak hour experiencing a deterioration in Level of Service (LOS) or an increase in delay of more than 3 seconds per vehicle for those junctions with a Level of Service categorised as E or F, which denotes junctions operating at or above capacity.*

*In comparison to the impacts above, development traffic is much more dispersed by the time it reaches the M3 and M25 motorway junctions. However, the development still leads to increases in flow on the motorway on sections which are operating at or overcapacity with a Level of Service category of C or D...*

Overall, the model suggests the impact of the addition of development at Fairoaks Airport is notable and across a wide area, with the potential to generate up to an extra 1,600 vehicle trips per weekday peak hour. Furthermore, the impact to the junctions and links reported **cannot be resolved by capacity improvements alone**.

As per the policies set out in Surrey County Council’s newly adopted Local Transport Plan (LTP4), this both highlights the need to ensure that, should the site be developed, it has sufficient and suitable amenities within walking distance to greatly reduce the need to travel by car for everyday purposes such as going to school, shopping, leisure and work, thereby creating ‘liveable neighbourhoods’, as well as providing suitable walk, cycle and public transport connectivity to surrounding towns and villages.”

6.2.88 In **conclusion**, in light of the Highways Assessment (2024) it is now fair to conclude that Scenario 2 leads to a significant concern over-and-above Scenario 1. There is a need for further detailed work to confirm the transport infrastructure upgrades that would be necessary and viable under Scenario 2.

### Water

Growth scenario 1 Constant supply components	Growth scenario 2 Constants + Fairoaks GV
★ 1	★ 1

6.2.89 Perhaps a primary consideration is in respect of capacity at wastewater treatment works (WwTWs). There is often good potential to deliver capacity increases in support of growth; however, this can be costly and lead to delays, and there can be residual risk of capacity being breached leading to pollution of waterways. As such, it is preferable to direct growth to locations with existing capacity.

6.2.90 Matters were explored through a Water Cycle Study (WCS) for Hart, Rushmoor and Surrey Heath councils in 2017. The study explores housing growth under various scenarios that do not necessarily relate to the scenarios currently under consideration; however, the study does highlight Chobham WwTW as having greater capacity to accept additional flows than is the case for the other two WwTWs in the borough, which are located at Camberley and Lightwater.

6.2.91 As for **Scenario 2**, it seems likely that wastewater would flow, or be pumped, to Chobham WwTW, but this has yet to be confirmed. It is also noted that Chobham WwTW storm overflow spilled 45 times for a total of 316 hours in 2023 (see <https://theriverstrust.org/sewage-map>).

6.2.92 Aside from WwTW capacity, other issues relate to surface and ground water pollution and water efficiency / minimising pressure on water resources. However, there is limited potential to differentiate the scenarios. The Fairoaks site promoters explain “a corporate commitment to achieve water efficiency in homes of at least 105 litres per person per day or lower...” However, some water companies now target 100 l/p/d.

6.2.93 In **conclusion**, it is not possible to differentiate between the alternatives with any certainty. With regards to significant effects, it is now appropriate to predict positive effects, given few concerns raised through the consultation in 2022, and given only very modest changes to the proposed strategy since that time (early certainty on growth strategy is very important from a perspective of effective planning for strategic infrastructure, including WwTW capacity). However, it is recognised that capacity at WwTWs has risen up the agenda nationally and locally since that time, and that the WCS is now somewhat dated.

### Summary and conclusions

6.2.94 The matrix below presents a summary of the appraisal presented above.

6.2.95 The appraisal matrix highlights **Scenario 1** as performing best in terms of the greatest number of topics, and it has the fewest predicted negative effects. However, it does not *necessarily* follow that Scenario 1 is best performing overall, because the appraisal is undertaken without any assumptions made regarding the ‘weight’ that should be assigned to each of the topics as part of decision-making. There are a range of issues and impacts associated with Scenario 1, particularly in respect of topics where the appraisal matrix flags an ‘amber’, but also under certain other topic headings (see further discussion in Section 9).

6.2.96 With regards to **Scenario 2**, this scenario is preferable to Scenario 1 from a ‘housing’ and a ‘communities’ perspective, particularly given affordable housing needs, Gypsy and Traveller accommodation needs and a place-making opportunity, plus there is a modest ‘economy and employment’ case to be made.

6.2.97 In general, strategic growth locations can give rise to considerable opportunities to realise sustainability objectives. However, the proposed garden village is relatively small in scale, and there are a range of locational issues and constraints. There might be the potential to address these, but there would be costs and trade-offs involved, which would need to be fully explored. Most significant concerns are around:

- Accessibility – the new community would not deliver higher order facilities, e.g. a secondary school.
- Biodiversity – given the sensitive location of the site between two components of the TBHSPA.
- Climate change mitigation – there are questions around both transport and built environment emissions.
- Transport – see the Highways Assessment Fair Oaks Airport Sensitivity Test (2024).

**Table 6.1:** Summary appraisal of the reasonable growth scenarios

SA topic	Growth scenario 1 Constants only	Growth scenario 2 Constants + Fair Oaks
	Rank of preference (numbers) <sup>24</sup> and categorisation of effects (shading) <sup>25</sup>	
Accessibility	★1	2
Air quality	★1	2
Biodiversity	★1	2
CC adaptation	★1	★1
CC mitigation	★1	2
Communities	2	★1
Economy & employment	★1	★1
Historic environment	★1	2
Housing	2	★1
Land, soils, resources	★1	★1
Landscape	★1	2
Transport	★1	2
Water	★1	★1

<sup>24</sup> A rank of 1 indicates the preferable scenario. Where both scenarios perform on a par they are both assigned ‘1’.

<sup>25</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.



# 7 The preferred growth scenario

## Introduction

- 7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of SHBC to the appraisal.

## Officers reasons for selecting the preferred scenario

- 7.1.2 The following statement explains SHBC Officers' reasons for supporting **Growth Scenario 1** in preference to the Growth Scenario 2 at this stage, in-light of the appraisal presented above.

"At a high level, the appraisal shows Scenario 1 to perform well relative to Scenario 2 in most respects. Specifically, Scenario 1 ranks highest in respect of seven sustainability topics, and the two scenarios are shown to perform equally for a further four topics. Scenario 2 outperforms Scenario 1 only in respect of two topics, and whilst both are important topics, Scenario 2 clearly performs less well overall.

The primary issue in terms of which Scenario 2 outperforms Scenario 1 is housing. However, the appraisal nonetheless predicts a 'limited or uncertain' positive effect for Scenario 1, because the identified housing supply is sufficient to meet the housing requirement to 2038 with a buffer of approximately 8%.

To summarise, SHBC officers note that there are there are four key reasons for selecting Growth Scenario 1 as the preferred scenario, as opposed to the Growth Scenario 2 which are outlined below:

- It is recognised that there are significant challenges with meeting full affordable housing needs identified in the LHNA 2024, which is a common issue faced across the South East of England due higher values and costs which impacts on the viability of delivering a higher level of affordable housing. However, this does not lead to the conclusion in the LHNA that there should be an uplift in the housing requirement from the standard method calculation for the Local Plan Local Housing Need figure. Indeed, the LHNA concludes that the standard method is appropriate for the Borough. Furthermore, the Council through its housing enabling role is able to support delivery of affordable homes through other mechanisms.
- Paragraph 145 of the NPPF 2023 is clear that, once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. As a result, whilst it is reasonable to consider alternative growth options involving larger-scale release of land from the Green Belt as part of the SA process, there is no requirement to amend Green Belt boundaries to deliver housing as part of the Local Plan process. Therefore, whilst it is noted that Growth Scenario 2 scores preferably to Growth Scenario 1 in specific areas such as housing, it is still reasonable to reject Growth Scenario 2 on the basis of Green Belt release.
- Scenario 2 would deliver up to 12 additional Gypsy and Traveller pitches, however this would be provided as part of a wider scheme, which in the Plan period equates to 1,000 new homes. Taking account of the significant level of enabling development that would be required, in the form of 1,000+ new homes in the Green Belt, and that the scheme would ultimately only deliver a small proportion of the overall unmet need for Gypsy and Traveller pitches, it is not considered that the benefits that would arise if the Council were minded to select Scenario 2 as its preferred option are sufficient to outweigh the resulting harm to the Green Belt, particularly when it is noted that the Council's overall housing need can be met without recourse to Green Belt release and in view of the policy context set out above.
- Finally, it is noted that in the context of the significant environmental and policy constraints affecting the Borough (which includes the Thames Basin Heaths Special Protection Area), Growth Scenario 1 represents a strategy that meets the housing requirement with a buffer and is demonstrably more sustainable than Scenario 2 across a range of topic areas – most notably air quality, biodiversity, landscape and transport.

The Local Plan seeks to respond to the issues and challenges flagged in respect of Scenario 1 through thematic and site-specific policies, which are further explored in Part 2 of this SA Report."

## **Part 2: What are the appraisal findings at this stage?**

## 8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal of the pre-submission version of the Local Plan. In practice, this means revisiting the appraisal of Growth Scenario 1, as presented in Section 6, but with added consideration given to proposed thematic, area-specific and site specific policies.

### 8.2 Overview of the Local Plan

8.2.1 The Plan presents policies under seven headings: Spatial strategy; Housing; Town centre, retail and economy; Infrastructure; Environment; Green Belt and countryside; and Design and heritage.

8.2.2 The **spatial strategy** is naturally a focus of the appraisal below. In particular, there is a focus on Policy SS1 (Spatial strategy), which identifies a housing requirement and sets out broadly how housing growth will be distributed. The policy also sets out broadly how employment land needs will be met and introduces the approach to planning for a hierarchy of centres, including Camberley town centre.

8.2.3 The other key focus of the appraisal is **the housing section of the plan**, which details the supply that has been identified to provide for the housing requirement. This breaks down as follows:

- Policy HA1 – does two things. Firstly it presents site allocation policies for those sites set to deliver more than 25 homes and also three sites allocated for extra care or residential care uses. Secondly, it lists SLAA sites with an identified capacity of between 10 and 24 homes.
- Policies HA2 to HA4 – present detailed site allocation policies for three key sites, namely:
  - London Road Block, Camberley Town Centre (Policy HA2);
  - Land East of Knoll Road, Camberley Town Centre (Policy HA3); and
  - Mindenhurst, Deepcut (Policy HA4).
- The SLAA 2023 – additionally lists sites with a capacity between 5 and 9 homes.

N.B. the above sites are all listed in Appendix 2 of the SLAA, which presents sites without planning permission as of 1<sup>st</sup> April 2023, with one exception, namely Mindenhurst, Deepcut (Policy H4). This site had planning permission as of 1<sup>st</sup> April 2023 (and so is listed in Appendix 4 of the SLAA) but warrants a policy in the plan due to its strategic importance).<sup>26</sup> Also, it should be noted that some sites have gained planning permission since 1<sup>st</sup> April 2023. Generally it is appropriate for the appraisal to focus attention on sites without planning permission, although sites with planning permission are also taken into account.

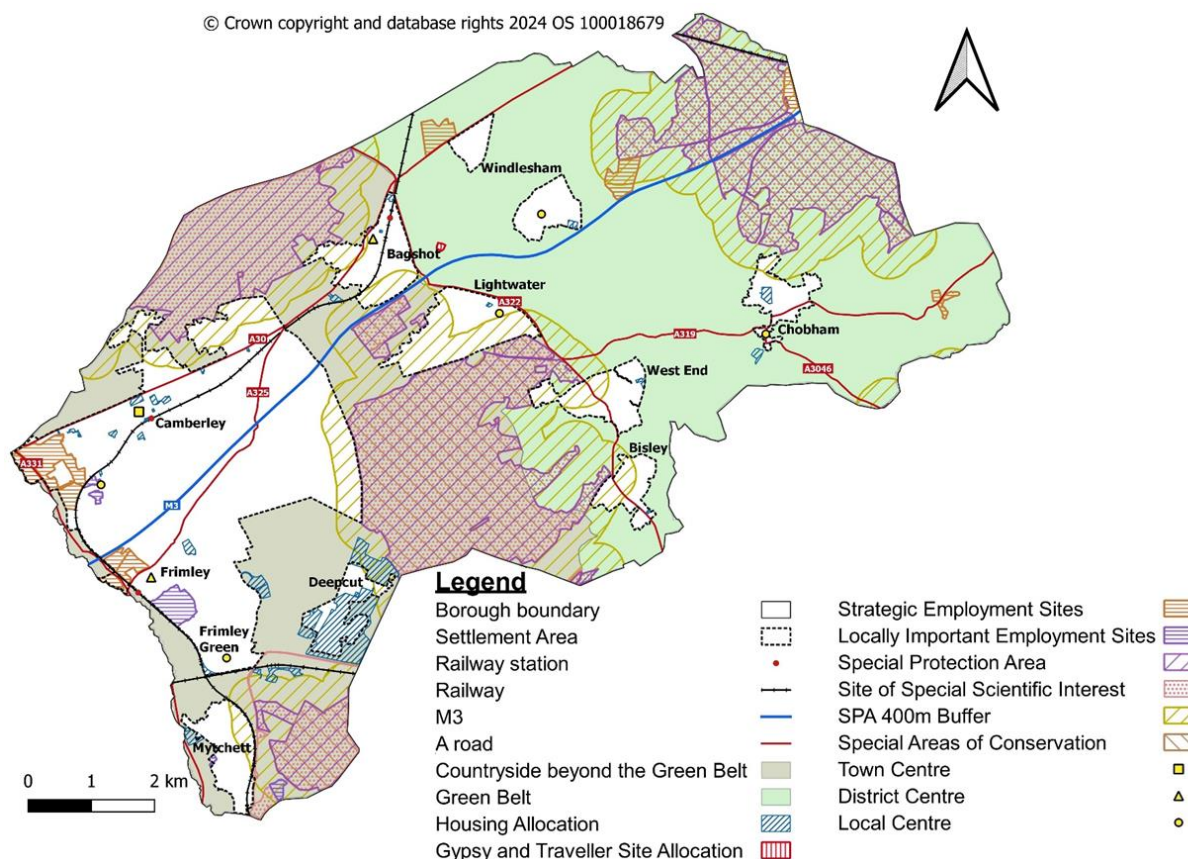
8.2.4 Proposed allocations are also shown on the **Key Diagram**, which is reproduced below. Importantly, the Key Diagram also shows existing employment sites, all of which are discussed in the Employment Supply Assessment (2023), which concludes that several have potential for intensification and so, it is fair to assume (and given policy support), will likely deliver new employment floorspace over the plan period. This is the primary means by which the *residual* need for new employment floorspace – as understood from the Employment Land Technical Paper (2023) – will be provided for over the plan period.

8.2.5 Three further points to note regarding the key diagram are as follows:

- Chobham – is currently washed over by the Green Belt, but the proposal is for it to be inset.
- Gypsies and Travellers – the proposal is to allocate one site to the east of Bagshot, namely Swift Lane Extension and remove the Swift Lane Gypsy and Traveller site from the Green Belt.
- Longcross Studios – whilst the majority of this employment site falls within Runnymede and was removed from the Green Belt by the Runnymede Local Plan in 2022 (along with land for a garden village), the very western extent of the studios site falls within Surrey Heath and remains within the Green Belt. As such, the proposal is to remove the Surrey Heath part of the site from the Green Belt. There is a clear case for this, with a view to creating a logical and defensible Green Belt boundary.

<sup>26</sup> A hybrid Planning Permission was granted in 2014 (ref. 12/0546) for 1,200 residential units and other uses including retail and community facilities. Since that time there have been a series of S73 applications and Non-Material Amendments providing alterations to the scheme as originally submitted. The Phase 1 Reserved Matters and site wide Design Codes were approved in 2016 and development of the first residential units commenced in 2018-19. Further phases of the development including supporting infrastructure have also been approved. Proposed Local Plan Policy H4 aligns with extant planning consent.

Figure 8.1: The Key Diagram



### 8.3 Appraisal methodology

- 8.3.1 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to discuss the merits of the Local Plan, as a whole, before reaching an overall conclusion on significant effects. Specifically, in accordance with the SEA Regulations, the aim is to “identify, describe and evaluate” significant effects.
- 8.3.2 Conclusions on significant effects are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations as well as the Government’s Planning Practice Guidance.
- 8.3.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the Local Plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how the Local Plan will be implemented ‘on the ground’ and the effect on particular receptors. Assumptions are set out where necessary.
- 8.3.4 Finally, it is important to note that efforts are made to strike a balance between, on the one hand, a need to be systematic and suitably comprehensive appraisal with, on the other hand, a need for conciseness and accessibility. The balance that is struck is one whereby issues are only discussed where there is the potential to meaningfully comment on the performance of the plan.
- 8.3.5 In turn, and to be clear, under each of the 13 topic headings the aim is *not* to systematically discuss each and every policy, nor each and every one of the issues/objectives identified at the SA scoping stage.

# 9 Appraisal of the Local Plan

## 9.1 Introduction

9.1.1 The aim of this section is to present an appraisal of the Local Plan under the 13 SA topics.

## 9.2 Accessibility (to community infrastructure)

9.2.1 Sustainability objectives include:

- Improve opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community
- Sustain and enhance the viability and vitality of town, district and local centres
- Improve the education and skills of the local population
- Maintain and improve cultural, social and leisure provision

### Discussion

9.2.2 The proposed strategy overall involves a limited focus on **strategic sites** suited to delivering new community infrastructure etc. However, the great majority of supply is from **sites within existing settlement boundaries**, which will tend to be relatively accessible locations. In particular, there is a clear focus of growth within **Camberley**, particularly in terms of new proposed supply, but also accounting for all supply over the plan period (i.e. completions and commitments, in addition to new proposed supply).

9.2.3 There is also a clear focus on regeneration within **Camberley town centre**, which is strongly supported from an accessibility perspective. Policy HA2 (London Road Block; 550 homes gross) is of primary importance, as this will deliver both residential and town centre uses. The supporting text explains:

*“Regeneration of the London Road Block will improve the integration of services for the public within the town centre and provide high-quality residential development in a sustainable location... development provides an opportunity to deliver a dynamic and sustainable area for living, working and visiting, with improved pedestrian links to the Square Shopping Centre, the High Street, and London Road.”*

9.2.4 Policy HA3 (Land East of Knoll Road Site Allocation; 340 homes) then deals with the other centrally important town centre allocation, although the proposal here is not to deliver a mixed used scheme to include commercial and community uses. The result will be a considerable reconfiguration of uses within the town centre, given the extent of existing office and community uses on-site. However, these are matters that have been explored through town-centre studies over recent years. The plan explains:

*“Following the proposed relocation of existing civic uses at Surrey Heath House and Camberley Library, the redevelopment of this site provides an opportunity to deliver a high quality new residential development within Camberley Town Centre and to improve access to existing public open space. Given the scale of the development, site wide master planning and Design Codes should be prepared...”*

*... will be redeveloped to create a high quality, residential-led quarter, providing an attractive environment for living and visiting, with distinct pedestrian links to the rest of the town centre, in particular Camberley High Street, Camberley station and the London Road development... The existing green link from Camberley High Street to the Grade II Listed Obelisk will be retained and reinforced, forming part of a new green corridor with improved access from the central core of Camberley Town Centre to Camberley Park, including The Obelisk and its wooded setting. The expanded and enhanced green corridor should be...”*

9.2.5 Also, with regards to Land East of Knoll Road Site allocation, it should be noted that the proposal in 2022 was for this site to be phase 1 of a wider long term “comprehensive redevelopment” to include phasing of land to the south beyond the plan period.<sup>27</sup> It is recommended that ongoing consideration is given to ensuring comprehensive growth with a long term perspective, including with a view to realising benefits.

<sup>27</sup> Phases 3 and 4 involved land to the south. Phase 2 (Former Portesbury School), to the east, is now a separate allocation.

- 9.2.6 At both of these key town centre sites it should be noted that development viability is challenging, as explained within the Viability Study (2024). However, this does not generate a need for any significant compromises in terms of use mix, infrastructure or masterplanning / design.
- 9.2.7 Finally, with regards to Camberley town centre, it should be noted that there are four further allocations, including three proposed to deliver new homes (with the fourth site expected to deliver a scheme focused on town centre uses; see Section 5.4). The most significant of these sites is Camberley Station, which is now proposed for 150 homes, having previously been considered for significantly fewer homes. The boost to housing at the site will presumably assist with achieving key objectives, e.g. the policy requires:
- “... a new or improved train station, with associated transport interchange facilities, including car and cycle parking... high-quality, design-led, public realm and wayfinding improvements for pedestrians and cyclists, improving connectivity to Camberley Town Centre and to both Portesbery Road and Knoll Road. Public realm improvements should focus on improving connectivity, safety, and sense of place... and [improved] interconnectivity between Camberley Train Station and the bus stops on Pembroke Broadway, through...”*
- 9.2.8 Elsewhere within **Camberley** there are nine further allocations, of which five are the focus of site-specific policy, plus there are seven further sites in the SLAA, each with a capacity of between 5 and 9 homes.
- 9.2.9 Focusing on the five sites with site-specific policy:
- In four cases – there is a focus on realising opportunities to improve permeability and links to key destinations are realised, and the remaining site is proposed for a care home, namely 61 - 63 London Road (including a requirement for “communal amenity spaces”).
  - York Town Car Park, Sullivan Road – is proposed to come forward alongside two adjacent smaller sites, hence there will be a need to consider realising the benefits of coordinated developments. The town centre is within walking distance (~800m) plus there is a nearby neighbourhood parade along the A30.
  - Camberley Centre – there is a requirement to retain the existing Adult Education Centre building and *“retain the existing educational community use on-site, or re-provide... at a suitable off-site location.”*
- 9.2.10 With regards to **Frimley**, there is only one proposed allocation, namely Sir William Siemens Square), which is currently the subject to a pending application for 170 homes. There are limited ‘accessibility’ focused site-specific requirements, primarily: *“improved pedestrian and cycle access to, and through, the site, with appropriate linkages to Frimley District Centre and the Station.”*
- 9.2.11 Across the **villages** the primary focus of growth is at Bagshot (both ‘new’ supply and in total), which benefits from a district centre and good public and active transport connectivity. There is also a focus of growth at Deepcut, where new community infrastructure is coming forward as part of the Princess Royal Barracks strategic scheme, but this is mainly committed. Taking sites with site-specific policy in size order:
- Chobham Rugby Club (91 homes) – a detailed site specific policy notably requires:
    - A suitable alternative location for the re-provision of the existing community and recreational uses.
    - On-site recreational play facilities in accordance with the Council’s adopted standards.
    - A site layout that delivers permeability throughout the site and incorporates suitable pedestrian and cycle access from the site to nearby community facilities; in particular, toward Chobham high street.
  - Land at Loen, St Catherines Road, Deepcut (60 homes C3 equivalent) – is proposed for extra care units. The site-specific policy does not include any accessibility-focused requirements.
  - Land at East Curve, Sturt Road, Frimley Green (60 homes) – is bounded by railway infrastructure on two sides, which limits opportunities for delivering increased permeability or other local enhancements. However, the site benefits from good proximity to Frimley Green local centre.
  - Bagshot Depot and Archaeology Centre, London Road, Bagshot (50 homes) – there is a requirement to *“provide improved pedestrian and cycle access from the site to Bagshot District Centre.”* The site has notably strong accessibility credentials, particularly given the close proximity of Bagshot rail station.
- 9.2.12 With regards to smaller allocations (10 to 25 homes) and other SLAA sites (5 to 9 homes), those within a settlement boundary give rise to few ‘accessibility’ concerns, and it is noted that proposed capacities set out in the SLAA do respond to accessibility levels. However, Sites 573 at Bisley is notable for being located near to the southern extent of the settlement, around 800m from the neighbourhood parade.

- 9.2.13 However, there is a need to flag several small sites not adjacent to a settlement boundary, specifically:
- Bagshot – Sites 407, 408 and 901 are located to the south of the village, over 1km from the district centre, although there is a cycle path along the A30, and also potentially good bus connectivity.
  - Deepcut – Site 757 is a relatively large site located to the south of the Basingstoke Canal, with the SLAA identifying capacity for 21 homes. There will be a need to carefully consider footpath connectivity to Deepcut and/or Frimley Green, e.g. considering the narrow footpath along Deepcut railway bridge.
  - Lightwater / Windlesham – Site 834 is located between the two villages, but the SLAA explains the potential to deliver five homes without GB release (given existing built form). There is a footpath along the road to Lightwater, but this is narrow and near non-existent over the Windle Brook bridge.
- 9.2.14 With regards to **thematic policies**, a wide range of policies are supportive of accessibility objectives, and none are identified as giving rise to any notable tensions. Policy **CTC1** (Camberley Town Centre) is considered to be of particular importance, recognising that there could potentially be significant windfall development in the town centre over the plan period, and it will be critically important that any such schemes come forward in line with an established strategy. The supporting text to the policy explains that key challenges relate to legibility, public realm and service areas, and the policy then seeks to respond to these challenges, mindful of the wider national context (e.g. online retail; permitted development rights), which mean that there is much greater flexibility for changes of use in town centres without the need for planning permission. One important consideration, amongst others, relates to definition of the Primary Shopping Area (PSA), informed by the Town Centre Uses Study (2020). A consolidated PSA is defined by Policy **CTC2**, with the supporting text explaining:
- “Whilst the need to be flexible and adaptable is recognised, the vitality of the town centre can be impaired when the core retail frontages are fragmented. As some control over changes of use will remain where planning permission is required, the Council considers that it remains appropriate to seek to retain a retail core where the impact of a change of use on the vitality and viability of the centre can be considered. This is consistent with the NPPF... which supports defining primary shopping areas and policies for the uses that will be permitted within them.”*
- 9.2.15 A range of other policies within the ‘Town Centres, Retail and Economy Policies’ section of the Local Plan are also relevant, and supportive of ‘accessibility’ objectives. Policy ER6 (Frimley Park Hospital) is of particular note, which supports development proposals *“for the retention and improvement of healthcare facilities... [that] form part of a comprehensive development strategy or business plan...”*

## Conclusion

- 9.2.16 The reconfiguration and regeneration of Camberley town centre represents a considerable opportunity to maintain and enhance the town centre’s community function, ensuring that it retains its role as the primary community infrastructure hub within the borough, is an attractive place to visit and spend time and is easily permeable and navigable on foot. The town centre allocations are important components of the overall strategy, in particular the two largest allocations, namely London Road Block (which will see an underused site in a town centre core location become a new central focus of the centre) and Land east of Knoll Road (which is at the edge of the town centre, and where development can deliver enhanced green space). These sites face viability challenges, which has necessitated detailed work, and there is also a need to ensure that growth is undertaken with a suitably strategic and long term perspective, but overall there is very strong support for directing such a high proportion of the proposed new supply to the town centre. Finally, within the town centre, the proposed significant increase to the housing yield at Camberley rail station will likely help with realising infrastructure and wider accessibility / community-related objectives.
- 9.2.17 Elsewhere there are limited community infrastructure opportunities set to be realised via the new proposed allocations / SLAA sites, although numerous sites have potential to support improved walking and cycling linkages / permeability. Also, a drawback of the proposed strategy relates to several small sites in less accessible locations, although these sites together comprise only a small element of the overall strategy.
- 9.2.18 With regards to site specific policies, there is a clear focus on use mix and realising opportunities for increasing permeability and improving walking/cycling links. With regards to borough-wide development management policies, numerous policies are supportive of accessibility objectives (no tensions are highlighted), with Policy CTC1 (Camberley Town Centre) considered to be particularly important.

- 9.2.19 Overall, a '**limited or uncertain**' positive effect on the baseline is predicted, as per the conclusion in 2022. It is worth highlighting that benefits will largely be felt in the long term, given the time that the town centre sites will take to come forward (notably London Road Block), hence it will be important to maintain a focus on 'easy win' opportunities for supporting the town centre in the shorter term. Also, it will be important to maintain an ongoing focus on growth-related opportunities at villages, e.g. schools-related.

## 9.3 Air quality

- 9.3.1 Sustainability objectives include:

- Ensure air quality continues to improve in line with national and/or WHO global targets
- Reduce noise pollution

### Discussion

- 9.3.2 There is only one Air Quality Management Areas (**AQMA**) in the borough, which is associated with the M3 through Camberley, and is not a key issue for the local plan, given limited potential to affect traffic levels through the AQMA, and given no proposed growth locations intersecting the AQMA (which intersects only a fairly small number of homes). Also, looking beyond the borough boundary, it is very difficult to suggest that the growth strategy gives rise to any concerns regarding increased traffic through an AQMA, including noting the conclusions of the Highways Assessment (2024; see discussion under Transport, below). It is noted that Bagshot links to Bracknell town centre via the A322, along which there is a AQMA that is likely quite problematic, in that it impacts a considerable area of urban realm, as well as some homes; however, it is unlikely to be the case that the quantum of growth directed to Bagshot (430 homes in total, including 112 homes new proposed supply) gives rise to a significant concern, including noting rail connectivity.

- 9.3.3 Looking beyond AQMAs, evidence comes from the Council's 2023 Air Quality Annual Status Report ([ASR](#)). However, the baseline situation does not serve to highlight any potential key issues for the Local Plan:

- In 2020 the annual mean **NO2** concentration, as monitored at our automatic monitoring station and 51 diffusion tube monitoring locations, all met the objective of 40 µg/m3.
- In the last few years, **PM10** readings from the automatic monitoring station indicate that monitored concentrations remain within air quality objectives.
- Currently there is no statutory requirement for local authorities to monitor **PM2.5** as part of the Local Air Quality Management framework. SHBC will continue to work with neighbouring local authorities, Surrey County Council, and other public agencies to meet PM2.5 long-term targets.

- 9.3.4 The ASR also discusses the following key actions of note:

- **The A331 project** – there is a long-standing project to address air pollution along the A331 through the Blackwater Valley settlements. However, it is difficult to suggest that the Local Plan generates any significant concerns or gives rise to any notable opportunities in these respects.
- **Local Cycling and Walking Infrastructure Plan (LCWIP)** – this is a major local (and national) initiative that is introduced in Section 5.3, above. There does appear to be quite good correlation between proposed growth locations and LCWIP priority corridors, which can be an important consideration from a perspective of helping to securing funding for upgrades (although CIL is also in place).

The same can be said in respect of priority corridors for maintaining and enhancing **bus services** and associated infrastructure (e.g. priority lanes at junctions and real time information on services).

- *“With secured funding from UK Government grants, SHBC will continue the partnership with an energy supplier to install **Electric Vehicle charging points** in public spaces and upon Council owned land. This project will be finalised in 2023.”* It is noted that none of the site-specific policies specifically refer to EV charging, but two do refer to parking as follows:
  - Land east of Knoll Road – “...well-integrated car and cycle parking provision in accordance with Surrey County Council’s parking standards and reflecting the town centre location.”
  - London Road Block – “... suitable, well integrated parking provision having regard to Surrey County Council’s adopted parking standards.”

- 9.3.5 Finally, the following sites are notable for being in **proximity to a source of air and/or noise pollution**:



- Bagshot - Site 247 is adjacent to two a-roads (the A30 and the A322 dual carriageway) and the railway. Through an early iteration of this appraisal it was recommended that site specific policy might be expanded to cover the matter of pollution from these sources, and this recommendation was then actioned. Also, several other small sites are located adjacent to the A30.
  - Camberley – several sites are adjacent to the A30 or the railway, although none are in close proximity to the M3 (this is similarly the case for Frimley, to the south of the motorway). Site specific policy for Camberley Station (150 homes) requires that proposals: *“be informed by the results of a full Noise Impact Assessment that considers the proximity to the railway line.”*
  - Deepcut – the largest new proposed allocation is adjacent to the railway line but is not the focus of a site-specific policy as its capacity is 21 homes such that it falls below the 25 homes threshold.
  - Frimley Green - Land at East Curve, Sturt Road is a new proposed allocation adjacent to two railway lines. Again there is a requirement for a Noise Impact Assessment.
  - Windlesham – Site 844 (20 homes) is near adjacent to the M3 (this is the only deliverable or developable SLAA site in proximity to the motorway, which is overall a strategy that is supported, noting experience from elsewhere, for example Longcross Garden Village in Runnymede Borough).
- 9.3.6 A final consideration is proposed support for a shift from office space to industrial space at some existing business parks, including at Frimley, which could have implications for **HGV movements**.
- 9.3.7 With regards to **thematic policies**, none give rise to any notable tensions with air quality objectives, whilst Policy **E4** (Pollution and Contamination) sets out to ensure that development *“does not give rise to, or would be subject to, unacceptable levels of pollution...”* Another policy of note is Policy CTC1 (Camberley Town Centre), for example the requirement to deliver *“a safe, healthy and accessible environment, supporting the 20 Minute Neighbourhood principles”*. It is recommended that consideration is given to opportunities to support last mile deliveries by non-car modes, noting that the ELR (2023) states: *“In terms of logistics, there is likely to be demand for some final mile premises to serve local populations in Camberley, Frimley and beyond (noting for example DPD at Albany Park).”*

## Conclusion

- 9.3.8 There are limited concerns regarding growth leading to increased traffic through a known air pollution hotspot (which principally means an AQMA), having accounted for the Highways Assessment (2024), plus it is recognised that the situation nationally in respect of air quality is improving (at least in respect of NO<sub>2</sub>).
- 9.3.9 Regardless, there is a need to carefully consider proposed allocations in proximity to the M3 (just one site for 21 homes), busy a-roads and/or the railway lines, both from an air quality and a noise/vibrations perspective. There is also generally a need for ongoing consideration of in-combination impacts of growth in the main urban area, and cross-border issues should remain under consideration. Also, there is a need to maintain a focus on directing growth so as to support ‘sustainable transport’ infrastructure upgrades.
- 9.3.10 With regards to site-specific policies, there is a requirement to consider noise impacts, although there could be the potential for further detail, e.g. specifying parts of the site that should be left undeveloped. With regards to borough-wide DM policy, in addition to Policy E4 (Pollution and contamination), policy for Camberley town centre is of note, including support for 20 minute neighbourhoods principles.
- 9.3.11 Overall, at this stage it is considered appropriate to predict a **‘limited or uncertain positive effect’** recognising the Highways Assessment (2024) and given that the baseline situation is one whereby development continues to come forward but in a less plan-led manner.

## 9.4 Biodiversity

- 9.4.1 Sustainability objectives include:
- Conserve and enhance the Borough’s biodiversity
  - Ensure the protection of the Special Protection Areas (SPAs)

## Discussion

- 9.4.2 Biodiversity is a key issue in Surrey Heath, given the borough’s close association with the internationally important Thames Basin Heaths Special Protection Area (TBHSPA).

- 9.4.3 The first point to note is that whilst all proposed sites are beyond the 400m **TBHSPA** buffer zone (albeit several are located not far beyond this zone) and there is confidence in the strategy for avoiding and mitigating effects. This matter is a focus of detailed consideration through a stand-alone Habitats Regulations Assessment (HRA). In particular, there is increased confidence regarding Suitable Alternative Natural Greenspace (SANG) capacity relative to 2022, with the latest situation:
- West of the borough – SANG capacity comprises current SANGs (Hawley Meadows, Shepherds Meadows, Swan Lakes, Blackwater Park) and the new SANGs coming forward (additional 850 capacity from Hart, 1,500 dwelling capacity from the new SANG site at St Catherines Road, and Diamond Ridge uplift for 350 homes). By the end of the plan period (2038) there will be 834 homes capacity remaining.
  - East of the Borough – SANG capacity comprises remaining capacity at Windlemere and Chobham. By the end of the plan period (2038) there will be 168 homes capacity remaining.
- 9.4.4 Matters are further discussed in a TBHSPA Topic Paper (2024). One point to note is an issue faced over recent years around SANG capacity being banked by applications that then do not come forward in practice (most notably Prior Approvals), although steps have now been taken to address this issue.
- 9.4.5 The next matter for consideration is then the risk of impacts to the nationally designated Basingstoke Canal **SSSI**, in the Deepcut sub-area. As discussed in Section 5.4, one SLAA site for 21 homes is near adjacent, and another nearby site (adjacent to the canal) was recently permitted for 65 homes. The SLAA site is proposed for a low density which serves to indicate good potential to maintain the mature trees onsite, and a design cue might be taken from the nearby committed Princess Royal Barracks strategic site, which is delivering a woodland buffer between new homes and the canal.
- 9.4.6 The next consideration is growth in proximity to a locally designated Site of Nature Conservation Importance (**SNCI**), and again attention focuses on the Deepcut area, particularly adjacent Sites 887 and 920, which are adjacent to the extensive woodland SNCI between Deepcut and Frimley (mostly MOD land), and it is noted that the site includes extensive tree cover. However, again the proposed density accounts for the woodland constraint. There is also a sensitivity along the Blackwater Valley at Mytchett, where there are two SLAA sites (23 homes in total) closely associated with the river corridor, including a site for 7 homes adjacent to an SNCI that also intersects woodland priority habitat.
- 9.4.7 Finally, there is a need to consider sites with tree cover, including woodland priority habitat or a tree preservation order (**TPO**). There are several such sites, including at Windlesham and at Bagshot. For example, Site 408 at Bagshot comprises woodland shown on the pre-1914 OS map, and around half is shown as priority habitat by the nationally available dataset. Also, at Camberley, Site 717 is covered by an area TPO, whilst Site 801 is described as being located in a “verdant” area with “*vigorous hedge boundaries.*” In general, Surrey Heath is clearly a heavily wooded / treed borough such that there is a need to explore ways of effectively integrating woodland and trees as part of development schemes.
- 9.4.8 Focusing on non-committed **proposed allocations**, the following are of particular note:
- Land East of Knoll Road, Camberley Town Centre (340 homes) – is sensitive on account of significant onsite mature trees and greenspace, including areas of priority habitat and a small area of TPO. Policy HA3 includes a very strong focus on green infrastructure / retaining greenspace (four separate criteria).
  - London Road Block, Camberley Town Centre (550 homes gross) – is a much less sensitive site, with site-specific policy requiring: “a green urban environment, including wildlife habitat creation.”
  - Sir William Siemens Square, Chobham Road, Frimley (170 homes) – the requirement is for: “urban greening... providing integrated amenity roof terraces and/or atrium courtyards...”
  - Camberley Station (150 homes) – again for urban greening, in this case to include “vertical greenery”.
  - Camberley Centre, Camberley (35 homes) – the requirement is to “*retain as far as practicable the existing abundance of trees and landscaping, which contributes to the local distinctiveness of the site.*”
- 9.4.9 With regards to **smaller sites** not formally allocated in the Local Plan, one site of note is Land east of Benner Lane, West End (16 homes), which comprises the remaining part of a reserve site dating from 2000. There is extensive woodland / forestry in this area, although not TPO or known to be priority habitat.

- 9.4.10 A further smaller site of note is **Land North of Guildford Road, Deepcut** (21 homes), which is sensitive on account of intersecting the TBHSPA buffer (also seemingly well linked by public right of way to the SPA, although the part of the SPA that is open access land is also MOD land with managed access), being located adjacent to the Basingstoke Canal SSSI and being heavily wooded, with the nationally available dataset suggesting that almost the entire site comprises priority habitat woodland (the site is shown as comprising wooded 'old gravel pits' on the pre-1914 OS map). It is recommended that consideration be given to drawing up site-specific policy in order to ensure that the anticipated number of homes can be delivered alongside measures sufficient to avoid and mitigate undue biodiversity impacts, also mindful of in-combination effects with nearby Land at Frimhurst Farm, which has planning permission for 65 homes. However, it is recognised that issues could and likely would be sufficiently considered under Policy EN2.
- 9.4.11 Finally, at Mytchett, there is a need to note **Mytchett Place Business Park**, which is located in the CBGB to the south east of Mytchett, within 400m of the SPA. There is an assumption of intensification of the site, in line with the findings of the Employment Supply Assessment (2023), but there are few concerns regarding impact pathways, given the employment uses involved.
- 9.4.12 With regards to **thematic policies**, none give rise to any notable tensions with biodiversity objectives, and the following should assist with mitigating growth related issues/impacts and realising benefits:
- Policy **E1** (Thames Basin Heaths Special Protection Area) – confirms the well-established arrangements for ensuring that development does not give rise to adverse effects on the SPA.
  - Policy **E2** (Biodiversity and Geodiversity) – includes an important focus on Biodiversity Opportunity Areas (BOAs) as a key geography, within which development proposals should take account of established conservation objectives. There will be a need to consider whether compensatory habitat enhancement / creation measures, necessary as part of the biodiversity net gain regime, should be directed to BOAs ahead of a Local Nature Recovery Strategy (LNRS) covering Surrey Heath.
  - Policy **E3** (Biodiversity Net Gain) – whilst the headline requirement for 20% BNG, rather than the nationally required 10%, is unchanged from the Draft Plan stage, there has been a considerable amount of work undertaken to evidence this policy approach, and set the foundations for its successful implementation, particularly in terms of well-targeted offsite habitat creation / enhancement (ahead of further guidance through the forthcoming [Surrey LNRS](#)).
- The Interim SA Report explained a need for “*detailed consideration [of] the potential to secure offsite biodiversity units within SANG, recognising the importance of not conflicting with the priority recreational function of SANGs*” and, in this respect, a considerable amount of work has been undertaken examining Windlemere SANG (a former golf course), concluding that there is potential to deliver a significant number of 'biodiversity units'. Importantly, work to understand the potential to generate biodiversity units in Surrey Heath has taken account of the specific types of habitat that are likely to be required, having accounted for the types of habitat likely to be lost through development.
- 9.4.13 The other key policy for consideration here is Policy **IN5** (Green Infrastructure), which includes a particular focus on the importance of securing a *network*, seeking to avoid “*loss or fragmentation of existing green infrastructure assets/components or compromise the integrity of the green infrastructure network...*”

## Conclusion

- 9.4.14 Several sites are in proximity to key designations, and a number of sites intersect woodland or contain extensive mature trees. However, on the other hand: there are some site-specific opportunities (albeit modest); the borough-wide proposal is to require that developments deliver 20% biodiversity net gain (with a considerable amount of good practice work undertaken in support of this proposal); and there is now a considerably improved situation in respect of SANG capacity within the west of the borough.
- 9.4.15 Overall, having accounted for DM policy (in contrast to the appraisal in Section 6) it is appropriate to predict a **neutral effect**, which is an improvement on the equivalent appraisal conclusion from 2022.
- 9.4.16 This conclusion is reached mindful that no comments were received in respect of biodiversity from any organisation through the consultation in 2022, despite the SA Report having said: “*The views of biodiversity focused organisations, including Natural England, the Wildlife Trust and the Woodland Trust, [are] sought through the current consultation... to ensure that the Local Plan growth strategy both minimises negative impacts on biodiversity and realises strategic opportunities as far as possible, ahead of a Local Nature Recovery Strategy (under the Environment Act) for Surrey...*”

## 9.5 Climate change adaptation

9.5.1 Sustainability objectives include:

- Minimise the risk of flooding
- Encourage reduced water consumption

### Discussion

9.5.2 The primary consideration here is **fluvial flood risk**, with other climate change adaptation considerations (see discussion in [Appendix 1](#) of the Climate Change Study, 2020) considered under other topic headings.

9.5.3 A number of sites intersect the flood risk zone, as discussed in Section 5.4, namely sites at Bagshot, Chobham, Mychett, West End and Windlesham. However, all of these sites are unchanged since the Environment Agency was consulted in 2022 (indeed, at one of the sites, namely a small site at Windlesham, the site capacity is now reduced). Key sites of note are:

- Mytchett – Site 912 significantly intersects flood zone 3, but the proposed capacity (16 homes) amounts to a low density (11 dph) accounting for the need to avoid development in the most constrained areas.
- Bagshot – one of the small SLAA sites to the south of the town (Site 317) is entirely within flood zone 2, and partially in flood zone 3. The SLAA capacity of 20 homes amounts to 133 dpa, with the SLAA explaining: “25 dwellings, as suggested by the site promoter, is considered high given character, context and flooding issues. However, flatted development may be appropriate as the site is adjoined by 3 storey flatted development.” It is recommended that consideration is given to a formal allocation and site specific policy, to ensure that steps are taken to avoid and mitigation (e.g. through design) flood risk, albeit borough-wide Policy E6 would be in place and apply.
- Windlesham – Site 834 comprises a collection of buildings at Broadway Green Farm, located between Lightwater and Windlesham. There is the potential for built form to avoid the Windle Brook flood risk zone, with only five homes proposed, but there is also a need to consider safe access/egress.
- Extension to Swift Lane Gypsy and Traveller Site – falls within flood zone 2.

9.5.4 A further consideration is **surface water flood risk**, with the primary consideration potentially surface water flood risk affecting Camberley town centre and land adjacent to the railway line that passes through the wider urban area. Another flood risk consideration can be development leading to increased surface water run-off and, in turn, increased downstream flood risk, but it is difficult to reach strong conclusions given potential to deliver sustainable drainage systems (SuDS).

9.5.5 With regards to **thematic policies**, none give rise to any notable tensions with climate change adaptation objectives, and a wide range of policies should assist with mitigating growth related issues/impacts and realising benefits, including:

- Policy **SS3b** (Climate Change adaptation) – supports a holistic approach to adaptation / resilience. Drawing a clear distinction between climate change mitigation and adaptation is strongly supported.
- Policy **E6** (Flood Risk and Sustainable Drainage) – is a detailed policy although there is limited local specificity. The policy incorporates detailed comments received from the Environment Agency and SCC.
- Policy **E7** (Watercourses and water quality) – has been added at the request of the Environment Agency, reflecting best practice nationally, although again there is limited local specificity.

### Conclusion

9.5.6 At this stage, it is appropriate to flag a **‘limited or uncertain’ negative effect** ahead of receiving detailed comments from the Environment Agency through the current consultation, albeit the current version of the plan does respond to comments on flood risk received from the EA and SCC at the Regulation 18 stage. Sites at Mytchett and Bagshot stand-out as larger sites (16 and 20 homes respectively) affected by flood risk. Flood risk can typically be addressed through borough-wide rather than site-specific policy, but river valley sensitivities at these sites potentially serve as reasons to consider preparing site specific policies.

## 9.6 Climate change mitigation

9.6.1 Sustainability objectives include:

- Reduce greenhouse gas emissions
- Increase energy efficiency and increase the use of renewable energy
- Encourage the use of more sustainable modes of transport and reduce traffic congestion

### Discussion

9.6.2 The primary consideration here is per capita built environment emissions, given the potential to cover matters relating to transport emissions under other topic headings.

9.6.3 As discussed in Section 5.3 and Section 6, strategic growth locations can give rise to an opportunity to minimise built environment emissions, hence the regeneration of Camberley town centre represents an opportunity. The proposed allocations are somewhat distributed across the town centre, and there are viability challenges, but consideration might still be given to a heat network linking two or more sites (although practice is increasingly focused on smaller scale low temperature heat networks). A recent example of a town centre heat network in Worthing, West Sussex, is discussed [here](#).

9.6.4 Elsewhere the focus is on smaller sites not likely to be associated with any particular economies of scale and, in turn, no particular net zero development opportunity. There is also a need to factor-in variation in development viability across the borough and between different types of site (notably flats versus houses).

9.6.5 Another consideration locally is understood to be the implications of grid constraints for EV charging and also electricity for heating (heat pumps). However, it is not possible to differentiate between sites in this respect. Another consideration is support for reuse of existing buildings, as opposed to demolition and rebuild, and it is recommended that opportunities for reuse are explored.

9.6.6 Decarbonisation is a focus of site specific policy for the two largest proposed allocations, namely London Road Block and Land East of Knoll Road in the Camberley town centre. Specifically, at both sites the requirement is to *“utilise net zero carbon design, including on-site renewable energy and/or decentralised energy generation.”* Also, schemes: *“... will be required to meet a net zero carbon output through either on-site renewable energy provision, decentralised energy generation, or a combination...”*

9.6.7 This approach is supported, given viability challenges at the site. However, it is recommended that there should be complete clarity on the requirement not being for onsite net zero, i.e. the policy approach does allow for offsetting (which should be undertaken as a last resort, in accordance with the energy hierarchy).

9.6.8 With regards to **thematic policies**, none give rise to any notable tensions with climate change mitigation objectives, and a wide range of policies should assist with mitigating growth related issues/impacts and realising benefits. In particular, there is an overarching strategic policy supported by two detailed policies in the ‘Environment’ and ‘Design and heritage’ sections of the Plan, as follows:

- Policy **SS3a** (Climate Change mitigation) – is broadly supported, and there is strong support for separating out climate change mitigation / decarbonisation and climate change adaptation / resilience.

In particular, there is strong support for the new proposed requirement that all ‘major’ residential schemes (i.e. schemes involving more than ten homes) achieve net zero development (where possible), which is a notable increase in stringency from the Draft Plan stage (2022).

However, there could potentially be a clearer and simpler requirement in respect of net zero development, with it stated clearly that this should be achieved in line with the energy hierarchy, which means ‘fabric first’ and with offsetting as a last resort.

Also, there is a notable requirement to ensure *“no net loss in the carbon storage capacity provided by the Borough’s trees”*, hence there may be a need to monitor loss of mature trees in development sites.

- Policy **E5** (Renewable and Low Carbon Energy and Heating Schemes) – amongst other things, requires that larger proposals *“incorporate measures to supply a minimum of 25% of the development’s energy needs from renewable and/or low carbon technologies...”* There is a need to carefully consider how this requirement aligns with the ‘fabric first’ approach and, in turn, the energy hierarchy.

- Policy **DH8** (Building Emission Standards) – elaborates on the net zero development requirement introduced under Policy SS3a. Considerations are:
  - Residential operational emissions – there is a clear case for setting a simple requirement for net zero development in line with the energy hierarchy, and then leaving the detail up to the discretion of individual applicants, including the specific balance between ‘fabric first’ versus onsite generation. As discussed in Section 6, a key question is how to report performance, namely A) the energy-based approach; or B) the Building Regulations approach. Many local authorities over recent years have sought to take approach (A), but this is now prohibited (see a recent presentation to [Uttlesford District Council](#)). With regards to (B), a recent good practice example is the [South Staffordshire Local Plan](#).
  - Residential non-operational (i.e. ‘embedded’) emissions – whilst there is a much greater focus on embedded emissions relative to the Draft Local Plan (2022), it is recommended that consideration is given to setting a quantified requirement. The Uttlesford Local Plan is one of many draft local plans that have recently set quantified requirements (see [slide 12](#) within the presentation discussed above).
  - Non-residential development – the proposal to require use of the BREAM standard is supported. Whilst use of various standards nationally can risk creating a confusing policy environment (such that there is a case for alternatively requiring clear quantified metrics), in the case of non-residential development and refurbishment schemes the BREAM standard is very well-established nationally.

## Conclusion

- 9.6.9 Focusing on minimising per capita built environment emissions, whilst it is difficult to conclude that realisation of decarbonisation opportunities has been a focus of spatial strategy and site selection, there is strong support for the changes to the DM policy framework since the Draft plan stage. This includes a new requirement for net zero development, although there is scope for a clearer/stronger emphasis on achieving net zero onsite (i.e. without having to resort to offsetting). Also, there is generally a need to maintain a watching brief in respect of latest best practice nationally, given the dual aims of: A) securing rapid decarbonisation, including via schemes delivering on the design intention; and B) ensuring a clear policy environment nationally, to the benefit of both those submitting and scrutinising applications.
- 9.6.10 Overall, and having accounted for the DM policy framework, and overall **neutral effect** is predicted. This reflects a view that the plan will result in an improvement on the baseline situation, but risks falling short of what is necessary if the target decarbonisation trajectory is to be realised (see discussion in Section 6).

## 9.7 Communities

- 9.7.1 Sustainability objectives include:
- Improve the population’s health
  - Improve the education and skills of the local population
  - Reduce crime, fear of crime and social exclusion
  - Encourage the enjoyment of the countryside, open spaces and local biodiversity
  - Sustain and enhance the viability and vitality of town, district and local centres

## Discussion

- 9.7.2 Aside from matters relating to access to community infrastructure and environmental quality/health, which have been discussed above, there are wide ranging other ‘communities’ related considerations. Section 6 has already presented a discussion of preferred strategy’s merits in terms of: Camberley town centre; loss / replacement of existing community uses; access to green space and play facilities.
- 9.7.3 The following bullet points consider settlements in turn:
- **Camberley** – town centre regeneration is a key opportunity, as has been discussed. There is a notable distinction between the two key allocations, with London Road Block proposed for mixed use (although there is less specificity relative to the Draft Plan stage) and Land East of Knoll Road proposed for residential plus extensive green infrastructure / public realm. The increased level of homes directed to the station redevelopment site is also of note, as it should assist with delivering upon infrastructure / community objectives and assist with stimulating further regeneration of the station area in the future.

Outside of the town centre the proposed allocations give rise to limited 'communities' implications, with it notable that there will be some loss of car parking, and sites proposed for older persons accommodation are also of note. There is also a clustering of sites along the Frimley Road, which could assist with realising walking and cycling (LCWIP) objectives, but this is not entirely clear.

- **Frimley** – an overall modest level of growth is modest, and it is important to note that Sir William Siemens Square (the sole allocation, and a large site) is coming forward for a residential-only scheme. Cycle connectivity to Camberley town centre may improve under the LCWIP, but growth is not directed to the priority LCWIP corridor. There is also a need to note that the future of the large SC Johnson employment site is somewhat uncertain, as has been discussed.
- **Bagshot** – is set to see a significant proportion of growth over the plan period, which is supported in a number of respects noting a district centre and a train station, plus there is existing cycle connectivity to Camberley that may be enhanced under the LCWIP, subject to funding. However, Bagshot is flagged by the Highways Assessment (2024) as a traffic hotspot and, given the small nature of the proposed sites, there is no clear potential for growth to deliver transport infrastructure or wider 'planning gain'.
- **Chobham** – is proposed to be inset from the Green Belt, which will bring the village into line with other villages in the borough, and the wider area. Linked to this, there is also a significant allocation within the proposed Green Belt inset boundary, namely Chobham Rugby Club, subject to the club relocating. There is a detailed site-specific policy for this sensitive site, which links very well to the local centre.
- **Deepcut, Frimley Green and Mytchett** – these settlements warrant being considered in combination, particularly given the proposed growth strategy, which includes a focus of growth in the CBGB between the settlements. There is a need for caution, although the Princess Royal Barracks development is delivering community infrastructure (also, there is a large new proposed SANG). At Mytchett the two proposed allocations are at sensitive locations associated with the Blackwater Valley, and there is also a need to consider intensification of Mytchett Place Business Park.
- **Bisley and West End** – are closely related villages, and both relate closely to Woking. Bisley is set to see a notably low growth strategy, whilst West End has seen notable recent growth at a long standing housing 'reserve sites', closely linked to a primary school. Bisley also has a primary school, but neither village benefits from a local centre, hence there is a need to caution against piecemeal growth.
- **Windlesham and Lightwater** – are quite closely linked settlements, linking closely to Bagshot and Camberley. Lightwater sees very low growth on account of constraints (it is also noted that the Highways Assessment flags Lightwater as a traffic hotspot, alongside Bagshot), whilst Windlesham has significant committed growth, plus some modest new proposed supply. Both villages benefit from a local centre, but there is no primary school at Windlesham (there are two infant schools), hence there is a need to caution against piecemeal growth. The LCWIP identifies the potential to enhance cycle connectivity between Windlesham and Bagshot, subject to funding, hence opportunities should be sought.

9.7.4 With regards to **site-specific policy**, there are numerous policy criteria that could be noted here as supportive of community objectives, for example:

- Camberley Centre, France Hill Drive, Camberley (35 homes) – amongst other things, the requirement is to *"implement a design-led development that is sympathetic to and integrates well with the scale, height, and character of the existing Adult Education Centre building; [and] retain as far as practicable the existing abundance of trees and landscaping, which contributes to the local distinctiveness..."*
- Chobham Rugby Club (91 homes) – amongst other things, sets out a need to consider *"the amenity of neighbouring residential areas and to enhance the green, open character of... open space to the east."*
- Numerous sites – there is a requirement for "high-quality, design-led re-development scheme that is sympathetic to the character of the area".

9.7.5 With regards to **thematic policies**, none give rise to any notable tensions with communities objectives, and wide ranging policies are supportive of communities objectives. As per the discussion above, under Accessibility, Policy **CTC1** (Camberley Town Centre) is arguably of particular importance, and one notable requirement for consideration here is the requirement for proposal to contribute to: *"delivery of a healthy and vibrant, experience based town centre [that] provides for all sectors of the community."*

9.7.6 The 'Infrastructure' focused policies also warrant consideration here, including Policy **IN4** (Community Facilities) and Policy **IN6** (Green Space), which set out the criteria that must be met in order for the loss of existing community facilities and green space respectively to be deemed acceptable.

- 9.7.7 There is also a need to consider Policy **DH1** (Design Principles), which covers a wide range of issues, such that it might be discussed under numerous topic headings. Amongst other things, there is a focus on 'access and inclusion', with measures specified to ensure that developments meet the needs of all users, and also a requirement to be "*flexible towards future adaptation in response to changing life needs.*"
- 9.7.8 Finally, Policy **DH2** (Making Effective Use of Land) is of note here (but again could also be discussed under numerous other headings). The policy sets out minimum density standards, relating to accessibility, but also includes flexibility for lower density schemes where necessary, e.g. on design grounds.

## Conclusion

- 9.7.9 Regeneration of Camberley town centre represents a significant place-making opportunity, including the creation of two new residential 'quarters' alongside new and relocated/upgraded community facilities. Proposed site-specific policy for the key town centre allocations is strongly focused on design and wider matters relating to place-making; and Chobham Rugby Club (91 homes) is another key site where site-specific policy is strong in place-making terms. However, sites below 25 homes are not assigned a site-specific policy, and as small sites will be associated with more limited place-making opportunity (but will need to come forward in line with borough-wide thematic development management policies including Policy DH1, Design Principles). A '**limited or uncertain positive effect**' is predicted.

## 9.8 Economy and employment

- 9.8.1 Sustainability objectives include:
- Support inclusive and diverse economic growth
  - Maintain stable levels of employment in the Borough
  - Support existing business structure and businesses
  - Sustain and enhance the viability and vitality of town, district and local centres

### Discussion

- 9.8.2 As discussed in Box 5.2, the proposal is not to allocate any new employment land, but rather rely on **intensification** of existing employment areas in order to meet residual floorspace needs over the plan period. The analysis within the Employment Supply Assessment (2023) supports this approach.
- 9.8.3 Key considerations are as follows:
- Whilst the employment policies aim to protect against loss of employment uses at designated sites, the ability to do so is limited, given the General Permitted Development Order ('**permitted development**'). This recently reverted to a more permissive approach in relation to conversion from office to residential uses and also change of use between various E use classes, which includes offices.
  - With regards to a reliance on the intensification of existing sites, there is also a need to factor-in potential concerns around **vehicle movements** (including HGVs) and related pollution / environmental health concerns. An example is the possibility of additional development at Mytchett Place which is within 400m of the TBHSPA although there is no indication in the employment evidence base that there would be a particular or over-reliance on Mytchett Place site for future growth, as a range and distribution of opportunities are identified, across a number of sites including Yorktown Business Park and SC Johnson, as well as intensification (office space to industrial/ logistics) at Watchmoor Business Park.
  - With regards to spatial strategy, the other key point to note is the discussion of **strategic warehousing** and **film studios** presented within the Employment Land Technical Paper (2023), also noting that data centres may also be argued by applicants to be Storage and Distribution (B8) uses. There is a national and regional demand for additional floorspace for these uses, but this demand could potentially be met as effectively in a less environmentally constrained area, outside of Surrey Heath. Policy ER1 and the designated employment sites policies (ER2,3,4) seek to support a broad and diverse range of employment uses and jobs, including floorspace for small and medium sized enterprises.
- N.B. in light of the bullet points above there is a clear need for ongoing close monitoring of employment floorspace issues, including in collaboration with neighbouring authorities.



- There is a need to state clear support for regeneration of **Camberley town centre** because, as discussed, it is a sub-regionally important hub of economic activity, including accounting for its close links to York Town Industrial Estate / Watchmoor Business Park. The Council has prepared a Strategic Vision for Camberley Town Centre, looking to 2032, which will inform future masterplanning and development along with the Local Plan, particularly policy CTC1 (Camberley Town Centre).
- Several SLAA sites will result in loss of **office space**, most notably Sir William Siemens Square, and at only one very small site (Site 320) is the intention for a mixed uses scheme to include employment land. At five sites the SLAA explains: “... *the site is currently in employment use... In accordance with Core Strategy Policy CP8, the loss of employment sites will only be permitted where wider benefits to the community can be shown. This can only be demonstrated through the planning application process.*” Also, it is noted that there is no longer a requirement to deliver new office floorspace at London Road Block (this was a requirement at the Draft Plan stage, 2022), although there is little reason to suggest any particular concerns in respect of office floorspace supply, in light of established needs.
- Finally, it is noted that there is a need to consider existing rural industrial / workshop / office space at Site 834 (Broadway Green Farm), although the proposal is only for five homes.

9.8.4 The following bullet points consider each of the employment focused policies in turn:

- **Policy ER1** (Economic Growth and Investment) – sets out the strategy of supporting intensification within existing employment areas. Also, planning permissions for new employment uses in these existing employment areas may be controlled by condition where appropriate, with a view to preventing future loss of employment floorspace under permitted development (as far as possible).
- **Policy ER2** (Strategic Employment Sites) – lists the strategic employment sites, and explains that there will be greatest support for Class B2 uses (general industrial) and E(g) uses, with less support for B8 (storage and distribution uses) due to the lower job ratios supported by these uses. There have been some adjustments to the list of sites since the Draft Plan stage, and the supporting text presents helpful background on specific sites. It is recommended that further clarity is provided regarding those sites expected to see significant intensification.
- **Policy ER3** (Locally Important Employment Sites) – includes the crucially important site SC Johnson (see Box 5.2). Employment use is in general protected, with loss only acceptable where specific criteria are met. Policy support for intensification of use applies to the Locally Important Employment sites by way of Policy ER1 being a consideration in relevant planning applications.
- **Policy ER4** (Yorktown and Watchmoor Business Park) – is supported as a detailed policy, but consideration might be given to supporting a move from office to industrial space, in line with the following finding of the Employment Supply Assessment (2023):

*“Further potential development opportunities could exist through the introduction of a greater mix of employment space to some existing primarily office-focused business parks, reflecting changes in working patterns and their impacts on the wider office market. The site assessments have identified a concentration of vacant space at both Watchmoor Park and Frimley Business Park.”*

- **Policy ER5** (The Rural Economy) – is supportive of economic land uses, subject to criteria being met. Also, it is noted that one SLAA site notably comprises a rural employment site, namely **Site 834**, between Windlesham and Lightwater, which comprises a collection of buildings associated with Broadway Green Farm, seemingly including older farm buildings and some more modern industrial units. The SLAA proposes delivery in years 6 to ten of the plan period, and explains:
 

*“... all current businesses would need to relocate if the site were to be developed for residential use. It is advised that although there are several business tenants, they are on short-term flexible leases and therefore this would not preclude vacant possession in the short-term.”*
- **Policy ER6** (Frimley Park Hospital and Healthcare Facilities) – is focused on supporting proposals for the retention and improvement of healthcare facilities, subject to criteria being met. The policy is simply a reflection of the hospital’s strategic importance and does not give rise to any issues or concerns.
- **Policy ER7** (Edge of Centre and Out of Centre Proposals) – this is an important policy, given some notable local areas of out of centre retail. However, it is mostly generic, such that it could potentially be a policy area covered by forthcoming National Development Management Policies.

- **Policy ER8** (District and Local Centres) and **Policy ER9** (Neighbourhood Parades) – identifying these areas on the policies map is very important, although again the policy requirements are somewhat generic. **Policy ER10** (Old Dean) presents detailed policy for one specific neighbourhood parade.

## Conclusion

- 9.8.5 Whilst the Interim SA Report published alongside the Draft Local Plan in 2022 predicted a 'limited or uncertain positive effect', it is now considered appropriate to predict a **neutral effect**. This is in light of the evidence of need, particularly for industrial land. The proposal is to meet residual need (i.e. after having accounted for completions and commitments) through intensification of existing employment sites, but this approach is inherently associated with an element of uncertainty. Having said this, it is recognised that calculations of residual need already take account of an element of non-delivery of permissions (specifically, 25% of permissions are assumed to not happen), so the conclusion is precautionary.

## 9.9 Historic environment

- 9.9.1 Sustainability objectives include:

- Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings

### Discussion

- 9.9.2 Camberley **town centre** is notably associated with few designated assets. However, the High Street retains elements of the original Victorian and Edwardian character of Camberley as a late 19th century settlement adjoining the Royal Military Academy.

- 9.9.3 As such, building heights and massing are an important consideration. Site-specific policy includes:

- London Road Block (550 homes gross) – there is a notable requirement for *“buildings on the High Street frontage, which complement the historic Edwardian and Victorian character of this part of the town centre”*. At the Draft Plan stage there was a specific requirement for buildings to be max 3 storeys.
- Land East of Knoll Road Site Allocation (340 homes) – a key aim is the protection and enhancement of the existing designated green space at Camberley Park including the wooded setting of the Grade II Listed Obelisk. There is also now a separate allocation for adjacent Former Portesbury School (36 homes), including specific requirements to *“protect and enhance of the setting of the Grade II Listed Obelisk within a wooded part of Camberley Park”* and *“respect, frame, and reinforce, the sightlines between the town centre and the Grade II listed Obelisk in Camberley Park.”*

- 9.9.4 Certain other proposed allocations are associated with notable historic environment sensitivities:

- Bagshot Depot and Archaeology Centre, London Road, Bagshot (50 homes) - proposals are required to *“demonstrate that the design of the scheme is genuinely conservation-led, having special regard to the retention and enhancement of the character of the **Bagshot Park Conservation Area** and its setting, in which the Grade II listed Bagshot Park forms the centre piece.”*
- Chobham Rugby Club, Chobham (91 homes) – is in close proximity to two **listed buildings**, but it is difficult to confidently suggest that the sports facility and pitches contributes to setting, also noting that the Chobham Club (which has planning permission for redevelopment) is potentially a detracting feature.
- Camberley Centre, France Hill Drive, Camberley (35 homes) – *“retain and reuse the existing Adult Education Centre building, a **local heritage asset**, including its landscape setting.”*

- 9.9.5 There are also several **smaller SLAA sites** associated with historic environment sensitivity, including:

- Bagshot – Sites 317, 320 and 714 are located at or close to the northern edge of the historic core, with Site 320 located to the west of the A30 and therefore adjacent to Bagshot Park. However, all are previously developed sites and therefore associated with limited sensitivity.

Also, to the south of Bagshot, three small sites appear to be mostly associated with intensification of late 19<sup>th</sup>C or early 20<sup>th</sup>C homes in large plots, and there is one Grade II listed building in the vicinity (potentially adjacent to the access for a 20 home scheme). There is also a non-designated milestone.

- Bisley – Site 236 was flagged in 2022 as comprising land to the rear of three or four homes potentially with a degree of historic character, although the site is now discounted in the SLAA as capacity has been reduced to less than five homes.
- Chobham – Site 548 is located outside of the proposed Green Belt inset boundary, but the site is partially PDL, such that some development could take place without the need for Green Belt release. The Conservation Area is adjacent, and the main building on the site is shown on the pre-1914 OS map.

There is also a need to consider the matter of inseting Chobham from the Green Belt, as discussed in Appendix IV. In short, inseting could lead to a degree of additional infill although design and heritage polices will protect the village's strong historic character.

- Deepcut – Site 757 is located adjacent to the Basingstoke Canal Conservation Area and is currently heavily wooded. As per the discussion above, under Biodiversity, it is recommended that this site warrants consideration of a formal allocation and site-specific policy; however, on the other hand, it is recognised that area-wide development management policies would apply.
- Windlesham – Site 834 comprises a collection of buildings associated with Broadway Green Farm, seemingly including older farm buildings and some more modern industrial units. The site is located in the Green Belt between Lightwater and Windlesham, but the SLAA explains the potential to deliver seven homes without impacting on the openness of the Green Belt. A collection of farm buildings is shown on the pre-1914 OS map, although none of the buildings are designated in any way.
- West End – Land East of Benner Land was a focus of site specific policy in 2022, including with reference to a nearby listed building, but the site is now significantly reduced in extent, such that it is no longer assigned a site-specific policy. The proposed allocation is unlikely to impact on the listed building.

9.9.6 With regards to **thematic policies**, none give rise to any notable tensions with historic environment objectives, and several are supportive, most notably Policy DH7 (Heritage Assets). There is limited local specificity, although the policy reflects detailed feedback received from Historic England, and there is a notable focus on two local-level designations that deal with areas of archaeological interest.

## Conclusion

9.9.7 A number of sites are associated with a degree of historic environment sensitivity, but this is largely unavoidable, and borough-wide thematic and site specific policy is proposed to ensure that necessary steps are taken to avoid and mitigate negative effects and potentially realise benefits. Few concerns were raised through the Draft Local Plan consultation in 2022, and so it is appropriate to predict a **'limited or uncertain' positive effect** at this stage, having taken account of proposed development management policy and recognising that the baseline situation is one whereby development will continue to come forward but in the absence of a local plan.

## 9.10 Housing

9.10.1 Sustainability objectives include:

- Meet identified housing need

## Discussion

9.10.2 As discussed in Section 6, there is support for the proposed strategy in that provision is be made for **housing need** in full over the plan period (once account is taken of a proportion of the supply coming forward in Hart District) although the plan period runs only to 2038.

9.10.3 Further considerations are:

- Supply buffer – the identified supply exceeds the identified housing requirement by ~8% in total (i.e. over the plan period as a whole), which is supported. A 'supply buffer' is typically considered necessary in order to avoid unforeseen dips in the supply trajectory leading to a risk of failing the Housing Delivery Test and, in turn, being subject to the presumption in favour of sustainable development in accordance with NPPF paragraph 11 (and, in turn, housing coming forward in a less plan-led manner).

- Mixed supply – numerous of the sites are associated with an element of delivery risk, e.g. relating to existing onsite employment uses, car parking or trees. However, the supply buffer reduces concerns, plus delivery challenges have factored-in to assumptions regarding when sites will deliver. On a positive note, the proposed supply is quite dispersed, as opposed to over-reliance on a small number of strategic sites, which can create a major delivery risk (such that a larger supply buffer is necessary).
- Flat / constant requirement – the supply trajectory is quite front-loaded, such that there is no requirement for a stepped housing requirement. The supply trajectory then falls below the housing requirement in the final years of the plan period, but there will be the potential to boost supply through a plan review.
- Locally arising needs – Lightwater stands out as a settlement set to see a low growth strategy over the plan period,<sup>28</sup> but this appears to be a largely unavoidable situation, given the extent of environmental constraints. The other village set to see a low growth strategy is Bisley, although Bisley relates very closely to both West End and Woking.
- Affordable housing – policy requirements are discussed below, but it is important to note the findings of the Viability Assessment (2024) in respect of limited potential to deliver affordable housing at the two strategic allocations in Camberley town centre. Also, the study explains that there may be a need for some “minor flexibility”, in respect of affordable housing, at other brownfield allocations in the western urban area in order to ensure scheme viability, having factored-in wider policy ‘asks’ including net zero.

Also, the 20 small SLAA sites below 10 homes will be unlikely to deliver affordable housing.

- Specialist accommodation – this has been examined through a recent Local Housing Needs Assessment (LHNA), which identifies six sites with planning permission that will (or should) deliver considerable supply, and then three allocations are made for either a care home or extra care accommodation.
- Family housing – there is a notable focus on sites in the urban area suited to flatted development. However, it is not clear that there is any concern regarding alignment with the LHNA.

- 9.10.4 Next there is a need to consider provision for **Gypsy, Traveller and Travelling Showpeople** accommodation needs. A dedicated consultation was held in late summer 2022, supported by an Interim SA Report. The preferred approach at the time was to allocate four sites; however, subsequent feasibility work has served to narrow this list considerably (as discussed in Box 5.2). As well as a worsened supply position, it is also the case that understanding of need for Gypsies and Travellers meeting the planning definition has increased since 2022. Specifically, following changes to the national ‘planning definition’ of Gypsies and Travellers whose need for pitches should be provided for, the borough need figure increased from 32 pitches to 35 pitches (plus there is a need for Travelling Showpeople Plots, which is understood to be unchanged since 2022). It is also recognised that there is no reason to suggest that the situation sub-regionally has improved since 2022 (this was a matter discussed within the Interim SA Report).
- 9.10.5 There is one proposed allocation for Gypsy and Traveller pitches, plus there is a dedicated criteria based policy (discussed below). Also, there are amendments to Policies H9 and GBC4 in support of sites.
- 9.10.6 With regards to the proposed allocation (Swift Lane extension), it should be noted that the site is subject to flood risk (and has also been closely examined in respect of contamination), and clearly the new pitches will be suited to meeting the need associated with the existing site (which is significant).
- 9.10.7 With regards to **site-specific policy** (on housing), criteria on housing mix are presented for the two key (non-committed) strategic allocations within Camberley town centre. In both cases previous references to including some townhouses are now removed, and the requirement is for an appropriate mix of new homes, having regard to the evidence in the most up-to-date housing need assessment, whilst recognising the town-centre location. For London Road Block this means “largely... flatted development.”
- 9.10.8 With regards to thematic policies, there are total of seven housing focused policies, plus there is a need to be mindful of many other policies that could lead to a cost burden on development with implications for development viability, including requirements around net zero development.
- 9.10.9 Taking policies in turn:

<sup>28</sup> The focus of discussion is on growth in dwelling stock over the plan period, i.e. from 2019, but there could also be merit to understanding which villages have grown more / less over the years preceding 2019, e.g. perhaps looking back to 2011.

- **Policy H5** (Range and Mix of Housing) – notably sets requirements for Accessible and Adaptable Homes and Self-Build and Custom Housebuilding for sites of 20 or more net new dwellings. There is also support for community-led housing via self-build which may contribute to additional affordable housing.
- **Policy H6** (Specialist Housing) – is supportive of specialist accommodation, including C2 older persons accommodation, provided certain criteria are met, for example, proposals should “*not result in the over-concentration of specialist housing in a particular locality, leading to a material change in character.*”
- **Policy H7** (Affordable Housing) – there have been some key changes since the 2022 Draft Plan stage. In particular, whilst the headline requirement remains delivery of 40% affordable housing, there is a now a key caveat that 20 to 30% is the requirement for flatted development in Camberley town centre.

There is also a notable adjustment to the required tenure split, which is a key consideration given recent very low delivery rates for social housing.

- **Policy H8** (Loss of Housing) – notably sets out that: “*Where evidenced by local needs the Council will support the retention of housing designed to meet the needs of the Borough’s older population and people with disabilities, such as single storey homes.*” A blanket presumption is an alternative option.
- **Policy H9** (Rural Exception Sites) – is supportive of small scale developments of affordable housing which are outside defined rural settlement boundaries, provided certain criteria are met, including in respect of connectivity, accessibility and settlement/landscape character.

Importantly, the policy would support provision of small scale developments of affordable pitches for Gypsies and Travellers.

- **Policy H10** (First Homes Exception Sites) – is similar to Policy H9 but deals specifically with First Homes exception sites. First Homes exception sites cannot come forward in areas designated as Green Belt.
- **Policy H11** (Gypsies, Travellers and Travelling Showpeople) – this is a key policy, in light of the discussion above regarding limited identified new supply, such that there is a need to support windfall sites. The policy has been notably expanded since 2022, for example with a new focus on Travelling Showpeople yards. The policy includes a range of detailed criteria, which is important noting the range of site-specific issues discussed within the Interim SA Report published as part of the consultation on providing for Gypsy, Traveller and Travelling Showpeople accommodation needs in 2022.

## Conclusion

- 9.10.10 The proposal is to provide for identified needs in full to 2038, and there is strong support for the proposed development management policies. However, there are arguments for additional supply, as discussed in Part 1 of this report. This is particularly the case given affordable housing needs and Gypsy and Traveller accommodation needs. It is considered appropriate to predict a **‘limited or uncertain’ positive effect**.

## 9.11 Land, soils and resources

- 9.11.1 Sustainability objectives include:

- Make the best use of previously developed land (PDL) and existing buildings
- Reduce contamination and safeguard soil quality and quantity
- Reduce generation of waste and maximise re-use and recycling

### Discussion

- 9.11.2 The proposed strategy is largely focused on **previously developed land**, and hence performs very well, particularly as the effect would be to minimise loss of productive agricultural land.
- 9.11.3 With regards to the three small SLAA sites in the **Green Belt**, the proposal is to support housing only on the previously developed parts of the site, such that there is no need for Green Belt release.
- 9.11.4 With regards to sites in the CBGB, several sites are greenfield comprising **woodland or forestry**, as discussed above, with none thought to comprise productive agricultural land; whilst others comprise the private grounds/curtilage/gardens of existing homes/buildings in large plots.

- 9.11.5 One site of note is **Site 178** (Land east of Benner Lane, West End), which is the remaining part of a long-standing housing reserve site. Whilst the majority of the site currently comprises woodland/forestry, the nationally available 'provisional' agricultural land quality dataset (which is very low resolution) shows an area of better quality (grade 3) agricultural land in the West End / Bisley area. Also, detailed survey work has also been completed in the vicinity (see the 'post 1988 classification' dataset at [www.magic.gov.uk](http://www.magic.gov.uk)), which indicates the presence of some grade 2 agricultural land.
- 9.11.6 The rest of the borough is shown by the national dataset to mostly comprise lower quality agricultural land.
- 9.11.7 A final consideration here is loss of **greenspace** within settlement boundaries, whether in the form of sports pitches, accessible greenspace or amenity grassland. A key site in this respect is Chobham Rugby Club, Windsor Road (Site 447, 91 homes), where the SLAA explains "*there is scope for the retention of green space and possible incorporation of additional green infrastructure on site.*"
- 9.11.8 Also, in this regard, it is noted that Site 837 is now discounted, having previously been supported. The 2021 SLAA had explained that a solution to the existing greenspace designation would be required.
- 9.11.9 With regards to **thematic policies**, none give rise to any notable tensions with 'land' objectives, and it is noted that Policy E2 (Biodiversity and Geodiversity) sets out that: "*Development will be expected to avoid the best and most versatile agricultural land. Areas of lower quality agricultural land should be used for development in preference to the best and most versatile agricultural land.*" The key consideration is that BMV agricultural land feeds-into spatial strategy and site selection at the local plan-making stage.

## Conclusion

- 9.11.10 The plan performs well notably well from a perspective of making good use of previously developed land and avoiding loss of BMV agricultural land. Several sites are greenfield comprising woodland / forestry or the private grounds/curtilage/gardens of existing buildings in large plots, but overall it is fair to predict a **'limited or uncertain' positive effect**, noting that the baseline scenario involves ongoing development.

## 9.12 Landscape

- 9.12.1 Sustainability objectives include:
- Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
  - Maintain and enhance the quality of countryside, Green Belt and open space areas

## Discussion

- 9.12.2 With regards to **landscape**, a range of relevant considerations have already been explored. The borough benefits from extensive woodland and forestry, which serves to screen and contain growth locations in the landscape and leads to relatively limited concerns regarding piecemeal expansion or 'sprawl' over time.
- 9.12.3 The first point to note is that the SLAA supports three small sites in the **Green Belt** where the proposal is for development without impacting on openness such that the sites will stay washed over by the Green Belt designation. All of the sites have limited containment in landscape terms, but the Green Belt designation should reduce any risk of problematic long term development creep.
- 9.12.4 Focusing on the two sites at West End, the sites are in quite close proximity, and both sites are associated with the **Trulley Brook corridor**, however there is no footpath along the brook linking the two sites. Land North of Old House Lane, which is located to the south of the village, appears to have a greater degree of existing built form on parts of the site, although there is possibly a sensitivity relating to the bridleway along the site's southern edge, plus land here falls within the landscape gap between West End and Bisley.
- 9.12.5 Further sites of note, in respect of landscape sensitivities, are at:
- **Bagshot** – there is a collection of small sites along the A30 between Bagshot and Camberley. The proposal is for an intensification of built form in a sensitive part of the countryside between settlements; however, it is noted that a low density is proposed for all three sites (albeit a primary aim is to buffer the railway line, more so than the road). Also, the extent of woodland and SANG in this broad area serves to suggest limited risk of problematic sprawl in the long term.

- **Mytchett** – Site 912 (16 homes) appears to be associated with an open river valley landscape, although it is not clear that there are any sensitive public view points into or across the site, and the scheme would be contained by the flood zone.
- **Deepcut** – several sites are associated with the landscape gap between settlements, as discussed in Section 5.4. However, this is a heavily wooded area, plus road infrastructure, the railway, the canal corridor and a proposed SANG assist with providing a landscape framework and avoiding the risk of problematic sprawl or settlement coalescence.
- **West End** – Site 178 is the remaining part of a long-standing housing reserve site. At the Draft Plan stage with was a larger allocation with a site specific policy requiring that proposals *“incorporate a significant landscape buffer along the eastern edge of the site that adjoins the Green Belt, helping to preserve the rural character of the area and providing a soft transitional edge...”*

9.12.6 With regards to **townscape**, as discussed under other topic headings above, there is a considerable focus on matters relating to urban design within the site specific policies, including with a focus on protecting valued trees / treescapes. In total five allocation policies refer to protecting “treed character”, plus there are numerous smaller sites where onsite trees and/or woodland is discussed within the SLAA.

9.12.7 With regards to **thematic policies**, none give rise to any significant tensions with landscape objectives, and several should assist with mitigating growth related issues/impacts and realising benefits. It could be suggested that various policies that are supportive of development (including potentially away from settlement boundaries, notably Gypsy and Traveller sites, or in the Green Belt, notably rural exception sites) give rise to a tension with landscape objectives, but there is no reason to suggest significant concerns. Policy protecting landscape character (etc) would apply, including Policy E7 (Landscape Character), which sets out that: *“Development proposals will be permitted which respond to and wherever possible enhance the special character, key positive landscape attributes, value and landscape setting of settlements.”* There is limited local specificity, but there is reference to taking account of the Surrey Landscape Character Assessment and the Surrey Heath Landscape Sensitivity Assessment.

9.12.8 Also of note are Policies GBC1-4, which set out the criteria under which proposals for development in the Green Belt and CBGB will be considered. With regards to GBC1 (Development of new buildings within the Green Belt), there have been some notable changes since the Draft Plan stage, including:

- The ‘materially larger’ percentage has been lowered from 30% to 15%. This reflects that the Council considers that the ‘materially larger’ test is a significantly more restrictive test in terms of the increase that may be found acceptable than the ‘disproportionate’ test (which relates to extensions and is set at 30% under Policy GBC2).
- A new paragraph is introduced to reflect that in order to be assessed against the ‘substantial harm’ test for the redevelopment of previously developed land,<sup>29</sup> schemes would need to demonstrate the need for the affordable housing and would be expected to comply with affordable housing policy.
- A new paragraph is introduced setting out that very special circumstances will need to be demonstrated in cases where development is proposed for the purposes of land management for nature recovery and/or enhancements to green infrastructure.

9.12.9 Finally, there are also some notable changes to Policy DH5 (Trees and Landscaping):

- A revised criterion in respect of the avoiding the loss of any tree, in order to avoid an unduly high bar. The revised criterion takes better account of the varying significance of different trees, by indicating that the loss of trees with the highest value (ancient woodland or ancient and veteran trees) should be wholly exceptional (in line with the NPPF), and that development involving the felling or significant pruning of other trees should be demonstrated to be necessary, with the public benefits of the loss of the trees demonstrably outweighing the wider value of the trees.
- A new requirement that replacement planting should be on a greater than 1:1 basis (rather than seeking to ensure no net loss of biomass, which would be difficult to calculate).
- A new criterion setting out that landscaping schemes should avoid provision of invasive species and should allow sufficient soil volume to enable new trees to survive into maturity.

<sup>29</sup> The NPPF indicates that the limited infilling or redevelopment of previously developed land should not have a greater impact upon the openness of the Green Belt than the existing development, or in the case of development that contributes to meeting an identified affordable housing need, should not cause substantial harm to the openness of the Green Belt.

## Conclusion

- 9.12.10 The proposal to maintain the current extent of the Green Belt (bar the inseting of Chobham village and removal of two areas for specific reasons) is supported from a landscape perspective. The corollary is a need to focus growth in the CBGB, and the outcome is a need to support certain sites that potentially give rise to a degree of tension with landscape objectives, notably at Bagshot and Deepcut. However, it is difficult to predict impacts of any significance, given that the landscapes in question are not known to be sensitive, and also given the potential to mitigate impacts through site layout, landscaping and design.
- 9.12.11 Overall, at this stage it is fair to predict a **'limited or uncertain positive effect'** given proposed thematic policies and recalling that the baseline situation is one whereby development continues to come forward.

## 9.13 Transport

- 9.13.1 Sustainability objectives include:

- Encourage the use of more sustainable modes of transport (public transport/cycling/ walking) and reduce traffic congestion

### Discussion

- 9.13.2 Beginning with **Scenario 1**, there is much to commend the proposed approach to distribution from a transport perspective, as discussed above, and noting the conclusion of the Highways Assessment (2023), as set out in Box 9.1, below. It is noted that 'exporting' unmet need is never something to be supported from a transport perspective, but the reality is that quantum of unmet need from Surrey Heath being provided for in Hart District is modest, and that the two local authorities share or have closely linked housing market areas.
- 9.13.3 A key point to note is that a Highways Assessment (2024) flags few concerns – see Box 9.1. Progress on the LCWIP since the 2022 Draft Plan stage is also encouraging. However, there is also a need to note that the Highways Assessment flags that there may be a need for localised highways mitigation tied in with specific developments as well as walking and cycling infrastructure upgrades. A strategic involving many smaller sites somewhat dispersed can create challenges in respect of securing infrastructure upgrades, but there are not particular concerns, including given ongoing consultation with SCC and CIL.

#### **Box 9.1: Conclusion of the Highways Assessment (2024)**

The proposed Surrey Heath Local Plan site allocations have been modelled using Surrey's strategic transport model SINTRAM, and an associated Local Model to assess their impact... in 2038.

Overall, the developments are reasonably small and dispersed, and the largest sites are located in areas with relatively high amenity, such as the sites in Camberley where shops, jobs and/or access to public transport is a walk away. Furthermore, many sites result in a loss of commercial activity which leads to a lower net increase in vehicle trips. As a result, the impacts tend to be local to the developments and the cumulative impact is in general tolerable. Nevertheless, there are some cumulative impacts in Bagshot and Lightwater. It is not considered that any of the cumulative impacts would be considered severe in terms of the [NPPF].

There may be a need for localised highway mitigation... This is to ensure there are high quality pedestrian and cycle links linking the developments with where people want to travel to in order to limit travel by private vehicle... Improvement of facilities to accommodate more movement on foot, by bicycle and on public transport may mean that motorised traffic will experience some increase in delay and congestion. As such, care will need to be taken to ensure there is no significant impact on the local environment including air quality.

Surrey County Council's newly adopted Local Transport Plan (LTP4) focuses on the principle of 'avoid, shift and improve' to achieve its objectives of: • Net zero carbon emissions • Sustainable growth • Well-connected communities • Clean air and excellent quality of life.

There is an opportunity at this stage to contribute to avoiding travel by reducing the number and length of trips needed through improved land use and travel planning... Planning places for people and liveability leads to less travel overall and makes travel by non-car modes an easier, more attractive option. More local services within walking and cycling distance can help to reinvigorate local communities and achieve health benefits, whilst benefitting local economies and reducing trip generation of motorised traffic.



The opportunity to implement liveable neighbourhoods is currently being explored for some of the more urban areas of Surrey Heath, subject to funding and community support. These plans are currently in development.

The Local Transport Plan... also emphasises the need to support increased use of sustainable forms of travel for local journeys via a new travel hierarchy to prioritise sustainable modes. This is particularly relevant in town centre locations such as Camberley where walking cycling and public transport should be prioritised...

A Local Cycling and Walking Infrastructure Plan (LCWIP) is also in development for Surrey Heath. LCWIPs... provide a strategic approach to providing walking and cycling improvements at the local level.

- 9.13.4 The other key matter for consideration here is around safe access for cars, larger vehicles, pedestrians and cycling, with the SLAA reporting that some sites are associated with issues and potential challenges that will require further investigation. For example, with regards to site 757 at Deepcut: *“The highways authority, SCC, would be consulted as part of any forthcoming application at the site, in relation to access. At this stage... SCC have advised that for one of the possible accesses, visibility is likely to be achievable in both directions on Guildford Road which would probably require the removal of trees and vegetation along the frontage of the site. There are other opportunities for access, but at this time they were considered less favourable by the highways authority.”* One other site seemingly with an access constraint, as has been discussed, is Site 834 south of Windlesham. There is a footpath along the road to Lightwater, but this is narrow and near non-existent over the bridge crossing the Windle Brook.
- 9.13.5 With regards to **site specific policy**, as has been discussed walking links and permeability through sites is a clear focus of the proposed approach at several sites, for example Land East of Knoll Road: *“Knoll Road currently acts as a barrier between the site and the rest of the town centre. Required streetscape upgrades will need to ensure that Knoll Road becomes more permeable for those crossing between the central core of Camberley and the site. This should be achieved using hard landscaping materials, pedestrian and cyclist crossings and traffic calming measures based on shared space principles. Such measures will help encourage visitors to use the site’s adjoining green resources, providing access to an attractive green enclave within Camberley Town Centre...”*
- 9.13.6 With regards to **thematic policies**, the primary policy for consideration is Policy IN2 (Transportation), which is mostly unchanged since the Draft Plan stage, bar new reference to the LCWIP. There is limited local specificity, but one of the requirements is that developments are: *“... located where travel can be minimised and the use of sustainable transport modes is maximised... improve transport capacity and opportunities for travel by rail or bus transport... [and provide] safe, convenient access... for all potential users including those with disabilities, giving priority to walking and cycling routes over vehicular traffic and maximising catchment areas for bus or other public transport...”*

## Conclusion

- 9.13.7 The Highways Assessment (2024) flags few concerns regarding problematic traffic congestion as a result of the proposed growth strategy, given a proposal to direct growth to Camberley town centre and also to disperse growth across smaller sites. However, there is also a need to recognise ‘transport’ arguments for supporting concentrations of growth (clusters and along corridors) in order to realise strategic transport objectives. A **‘limited or uncertain’ positive effect** is predicted, as per the Draft Plan stage. It will be important to take account of representations received from Surrey County Council on the current proposed submission version of the plan, including in terms of alignment with the Surrey LTP4.

## 9.14 Water

- 9.14.1 Sustainability objectives include:
- Maintain and improve the quality of water resources
  - Encourage reduced water consumption

## Discussion

- 9.14.2 With regards to **strategy/sites**, there is little potential to elaborate on the discussion of the preferred growth scenario (Scenario 1) presented in Section 6, which focuses on WwTW capacity. The Interim SA Report (2022) flagged a need to confirm capacity at Camberley WwTW, but no concerns regarding WwTW capacity were raised by either Thames Water or the Environment Agency through the consultation in 2022.

- 9.14.3 With regards to **site-specific policy**, whilst the proposal in 2022 was to reference the need for “*rainwater management through SuDs integrated with landscape design to visually and environmentally enhance the public and private realm*” at London Road Block, this text has now been removed. This aligns with a general approach of seeking to avoid being overly prescriptive / allow flexibility at this challenging site.
- 9.14.4 With regards to **thematic policy**, there is clear support for:
- Policy E7: Watercourses and water quality – has been developed in collaboration with the Environment Agency. It is mainly a generic policy, as opposed to one tailored to the Surrey Heath context.
  - Policy IN1 (Infrastructure Delivery) – confirms the need for applicants to demonstrate “*adequate wastewater capacity and surface water drainage both on and off the site to serve the development and evidenced engagement with Thames Water and Surrey County Council as Lead Local Flood Authority.*”
  - Policy DH4 (Sustainable Water Use) – all new homes are required to meet the water efficiency standard of 110 litres per person per day, to be achieved through compliance with the Building Regulations. As discussed in Section 6, there can be the potential to achieve higher standards.

## Conclusion

- 9.14.5 Whilst the Interim SA Report (2022) flagged a possible negative effect ahead of consultation, it is now appropriate to predict a ‘**limited or uncertain positive effect**’ given few concerns having been raised through the consultation in 2022 and given only very modest changes to the proposed strategy since that time (early certainty on growth strategy is very important from a perspective of effective planning for strategic infrastructure, including WwTW capacity). However, it is recognised that capacity at WwTWs has risen up the agenda nationally and locally since that time, and that the WCS is now somewhat dated.

## 9.15 Overall conclusions

- 9.15.1 In conclusion, the appraisal predicts a ‘limited or uncertain positive effect’ in respect of nine objectives, a neutral effect in respect of three objectives and a ‘limited or uncertain’ negative effect in respect of one objective, namely climate change adaptation. Key findings are as follows:

- **Positive effects** – the plan performs broadly well in **numerous respects**, but ‘planning gain’ is limited outside of Camberley town centre, given a focus on smaller sites, which limits the potential to conclude ‘significant’ positive effects. With regards to **housing**, the proposal is to provide for identified needs in full to 2038, but there are arguments for additional supply, as discussed in Part 1 of this report. This is particularly the case given affordable housing needs and Gypsy and Traveller accommodation needs.
- **Neutral effects** – the first topic is **biodiversity**, where the predicted ‘neutral’ effect reflects a precautionary approach given local sensitivities; it could easily be argued that the effect is positive, given the importance of a plan-led approach to growth and given detailed work on biodiversity net gain.

The second topic is then **climate change mitigation**, where there is an argument for concluding a negative effect, as measured against an ambitious net zero trajectory (e.g. net zero by 2030, which is a very common target amongst local authorities nationally). However, the policy requirement around net zero development has been notably strengthened since the Regulation 18 Draft Plan stage.

The third topic for which the appraisal predicts neutral effects is **economy and employment**. This is because of the uncertainties involved with relying solely on intensification of existing employment areas in order to meet residual employment floorspace needs (particularly industrial). However, again, this conclusion reflects a precautionary approach, as considerable intensification opportunity exists.

- **Negative effects** – no ‘significant’ negative effects are predicted, which is quite rare (local plan-making will often involve significant trade-offs). However, there is a clear need to flag the risk of a somewhat negative effect in respect of climate change adaptation, and specifically **flood risk**. The Environment Agency raised very limited concerns through the consultation in 2022, but it is expected that the EA will wish to re-examine all sites (allocations with a policy, allocations without a policy and other SLAA sites) through the current consultation. There is a clear site-specific case for growth at most of the sites affected by flood risk, plus there is a need to consider strategic factors, including the challenge of providing for development needs in the context of very limited options outside of the Green Belt.

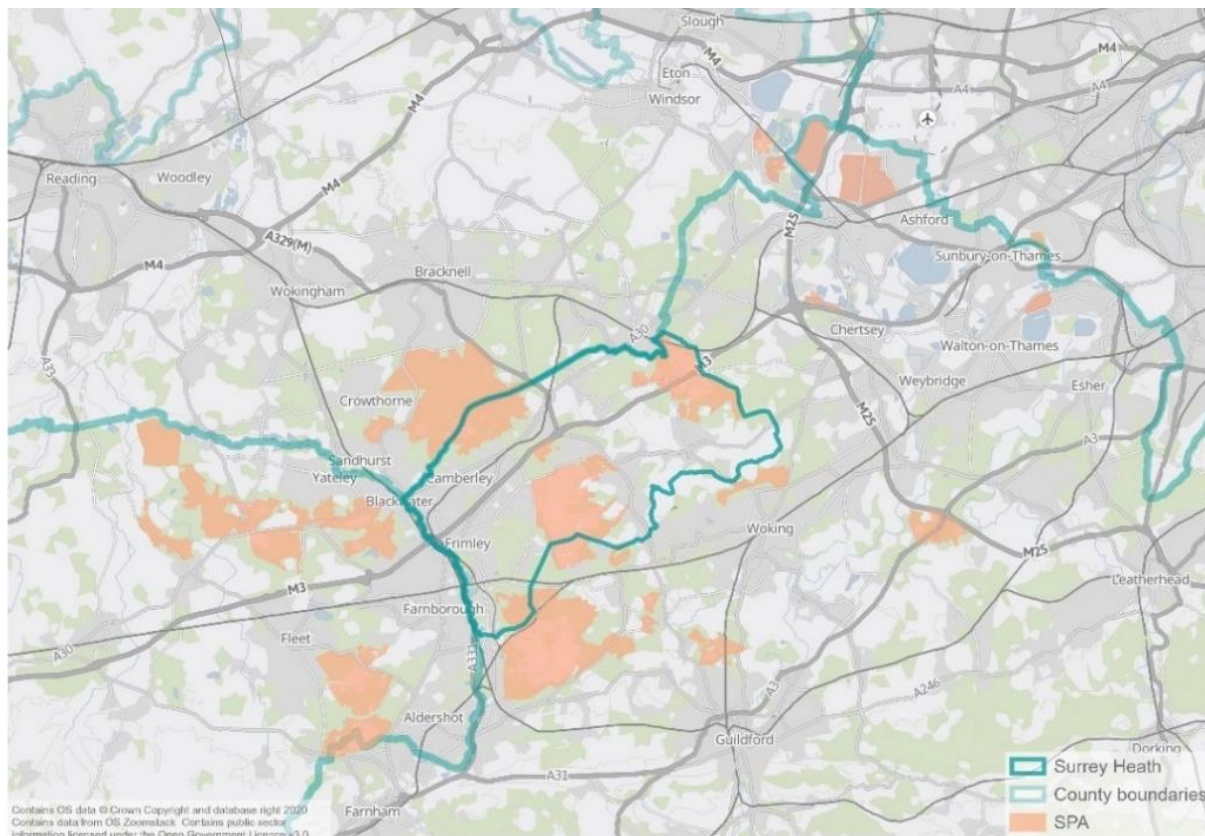
- 9.15.2 There will be the potential to make improvements to the plan through the forthcoming examination in public. Improvements to the plan might seek to further bolster positive effects identified through this appraisal, and there will certainly be the potential to further explore tensions with sustainability objectives.

- 9.15.3 A small number of specific recommendations are discussed. However, it is inherently difficult to make specific recommendations because actioning them will inevitably have implications that are difficult to foresee and account for here. For example, it would be very easy to recommend further detailed policy in respect of net zero development, following the best practice examples that are emerging nationally, but this would have cost/viability implications such that there could be a need to accept trade-offs – i.e. less stringent policy in respect of one or more wider objectives (e.g. affordable housing) – and/or there would be a need to undertake detailed work with time and resource implications. Equally, it would be very easy to recommend further site-specific policy, but there is always a risk of being overly prescriptive, such that there is reduced flexibility at the development management stage, potentially leading to delivery risk.
- 9.15.4 Finally, it should be noted that the current version of the Local Plan was prepared taking account of the appraisal presented within Section 9 of the Interim SA Report (2022) and, indeed, there was also an iterative step prior to that, i.e. a working draft version was appraised in 2021. There is no requirement for SA to be iterative in this way, but it helps to demonstrate a robust and sound plan-making process.

#### Cumulative effects

- 9.15.5 There is a need to give separate consideration to ‘cumulative effects’, i.e. effects of the plan in combination with other plans and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential ‘larger than local’ effects. The following bullet points cover some key considerations:
- **Housing needs** – the proposed strategy involves unmet needs from Surrey Heath provided for within Hart District and does not make any provision for the risk of unmet needs arising from elsewhere in the sub-region. However, this is an appropriate strategy because: A) the matter of unmet needs provision in Hart is agreed and set out in an adopted Local Plan, such that it does not need to be revisited at the current time; and B) the environmental constraints affecting Surrey Heath mean that the borough is not suited to providing for unmet needs from Woking or elsewhere in Surrey, plus there is a need to recognise that Surrey Heath shares a housing market area with the North East Hampshire / Blackwater Valley authorities to the southwest (from where there is little or no risk of unmet needs arising). Work has been undertaken to appraise higher growth scenarios (see Sections 5 and 6), but only because of the need to explore the possibility of providing for locally arising housing needs (including affordable) more fully and/or providing for a larger ‘supply buffer’ over-and-above the housing requirement. It is recognised that unmet need across Surrey is a major issue; however, making provision for unmet need within Surrey Heath is clearly unreasonable, on the basis of the discussion above.
  - **The economy** – given links to the M3 corridor, West London and the A322 / Blackwater Valley, there is a clear need for Surrey Heath to provide for locally arising needs in full, and also consider supporting footloose industries that need to be accommodated in the sub-region, notable strategic warehousing and film studios. As discussed in detail above, including within Box 5.2, the proposal is to provide for locally arising needs in full through intensification of existing employment sites only, which leads to an element of risk. However, there is strong support for the Camberley town centre regeneration strategy.
  - **MOD operations** – this is a clear ‘larger-than-local’ consideration. The appraisal does not highlight any issues or risks, but the views of the MOD are sought through the current consultation.
  - **Transport corridors** – the appraisal does not highlight any major growth-related issues or opportunities, in respect of either rail or strategic road corridors (also mindful of cross-border cycle connectivity) but this could well be a focus of ongoing scrutiny moving forward, e.g. alignment with the Surrey LTP4.
  - **Thames Basin Heath SPA** – the matter of in-combination impacts to the SPA is a focus of a stand-alone Habitats Regulations Assessment (HRA), noting that eleven authorities manage the SPA in partnership. Key considerations include management of Horsell Common in collaboration with Woking Borough, and Chobham Common in collaboration with Runnymede District and RB Windsor and Maidenhead.
  - **Landscape scale nature recovery** – there is a need to focus efforts on achieving conservation and ‘net gain’ objectives, in respect of biodiversity and wider natural capital and ecosystem services, at functional landscape scales, including landscape character areas and river corridors. A Local Nature Recovery Strategy (LNRS) for Surrey is forthcoming, but steps must be taken in the interim. Aside from matters relating to the TBHSPA and its associated heathland and former heathland landscapes, a primary consideration is potentially realisation of opportunities along the Blackwater Valley corridor in collaboration with Rushmoor Borough and Guildford Borough and other partner organisations. Views on constraints and growth-related opportunities are sought from key partner organisations.

**Figure 9.1: Surrey Heath within Surrey and linking closely to Berkshire and Hampshire**



**Figure 9.2: Camberley town centre – an important centre in the sub-region**



## **Part 3: What are the next steps?**

## 10 Plan finalisation

- 10.1.1 Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. The Council will also submit the SA Report.
- 10.1.2 At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness. 'Mods' will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 10.1.3 Once found to be 'sound' the Local Plan will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) "the measures decided concerning monitoring".

## 11 Monitoring

- 11.1.1 The SA Report must present "measures envisaged concerning monitoring".
- 11.1.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- Air quality – it will be important to consider adjustments to the air quality monitoring regime in response to the growth strategy, particularly with a focus on the western urban area.
  - Agricultural land – this is not a major issue for the plan but could lend itself to more detailed monitoring.
  - Biodiversity – there will be a need to establish a regime for ensuring that decision making in respect of biodiversity net gain as part of planning applications is undertaken under a strategic spatial framework – informed by the forthcoming Local Nature Recovery Strategy – and then monitor effectiveness.
  - Climate change adaptation – this is a **key issue** for monitoring. There can be confusion around flood zones, once account is taken of expanded zones under climate change scenarios, but there is a need for complete clarity. It would be useful to monitor not only the number of homes that come forward in a flood risk zone, but also the nature of the schemes (e.g. PDL) and mitigation measures implemented.
  - Climate change mitigation – built environment decarbonisation is a rapidly evolving policy area, and so it will be important to monitor the sufficiency of policy. Also, it is again the case that this can be a confusing policy area, but there is a need for complete clarity, including so that the interested public can effectively scrutinise planning applications, applications can be compared and trends understood.
  - Communities – there is a clear need to monitor progress in respect of the regeneration of Camberley town centre, including with a view to considering how current proposed schemes might link most effectively with other schemes that come into consideration in the near future. There are major opportunities to be realised through a strategic and coordinated approach with a long term perspective.
  - Economy and employment – this is another **key issue** for monitoring. It will be important to closely monitor whether existing employment sites are coming forward for intensification as anticipated, plus there is a need for close monitoring of employment land losses through permitted development.
  - Historic environment – Historic England are well placed to recommend monitoring measures that may be proportionate and achievable. Chobham could be a focus of efforts, in light of Green Belt inseting.
  - Housing – this is clearly a **key issue** for monitoring, as reflected in the Council's existing Authority Monitoring Report regime. It is strongly recommended that there is an improved focus on monitoring affordable housing delivery by tenure split, including due to very limited recent social housing delivery. There is also a clear need for regular monitoring of Gypsy, Traveller and Travelling Showpeople accommodation needs, potentially in collaboration with neighbouring authorities.
  - Transport – understanding of strategic transport infrastructure issues and opportunities changes significantly over time, hence there is a need to consider local plan implications on an ongoing basis.
  - Water – ongoing consideration should be given to any risk of capacity breaches at WwTWs and other risks to the status of water courses.

# Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

**Table A:** Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
<b>Introduction</b>		What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
		What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What's the SA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
<b>Part 2</b>	What are the SA findings at this current stage?		<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
<b>Part 3</b>	What happens next?		<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

**Table B: Interpreting Schedule 2 and linking the interpretation to our report structure**

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> <b>[Part 1 of the Report]</b>
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> <b>[Part 2 of the Report]</b>
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> <b>[Part 3 of the Report]</b>



**Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.**

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	Key issues and objectives are also presented within Appendix II.
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. Also, key issues and objectives are discussed in Appendix II.  With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios.  Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal.  Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This SA Report is published alongside the Draft Plan in order to inform consultation and plan finalisation.  Also, note that Interim SA Reports accompanied previous consultations under Regulation 18 (see Section 4).
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising over the course of the examination in public (see Section 10).  Also, note that previous Interim SA Reports naturally fed in to SA work in 2023/24, i.e. preparation of this SA Report.

# Appendix II: The SA scope

## Introduction

The aim here is to elaborate on Section 3, which presents the SA framework. In particular, under each of the sustainability topic headings (that are at the core of the SA framework) the aim is to:

- List the sustainability objectives defined at the scoping stage.
- Give a brief overview of the issues that are a particular focus in practice, given the scope of the emerging local plan and reasonable alternatives.
- Present a selection of key maps, particularly with a view to providing insights into three recent evidence studies, namely the Viability Assessment, Local Housing Needs Assessment and Employment Land Technical Update.

N.B. the information presented below is a departure from that presented within the equivalent section of the Interim SA Report (2022), which sought to summarise information on the SA scope as previously presented within the Interim SA Report (2018). At this advanced stage of the plan-making / SA process there is a clear need to present targeted information on the SA scope, i.e. targeted in the context of the plan and reasonable alternatives.

## Accessibility (to community infrastructure)

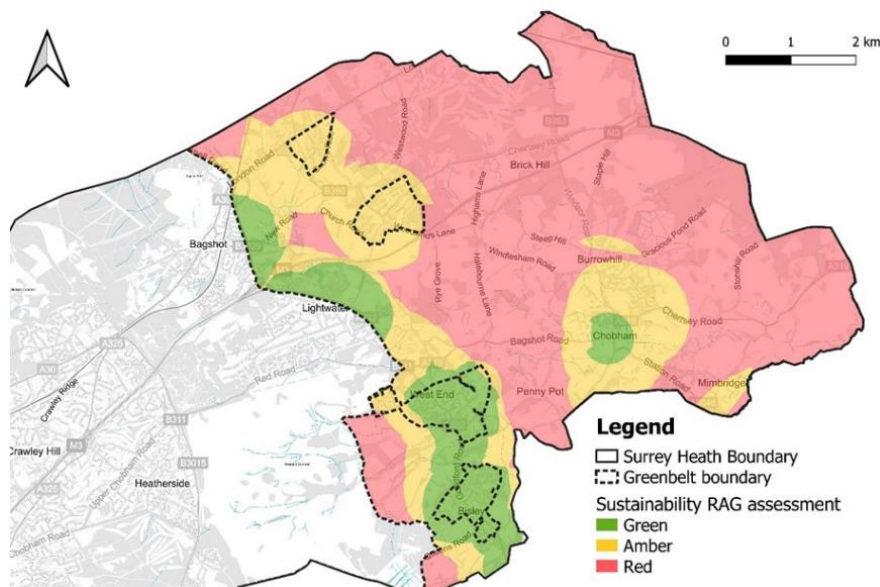
Sustainability objectives include:

- Improve opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community
- Sustain and enhance the viability and vitality of town, district and local centres
- Improve the education and skills of the local population
- Maintain and improve cultural, social and leisure provision

Discussion under this topic heading allows the opportunity to focus on a specific communities-related sustainability objective that is often, or even invariably, a key issue for local plan-making, namely ensuring accessibility to community infrastructure. As well as a clear need to direct growth to more accessible locations, growth can be directed in such a way that opportunities are realised to deliver targeted new or upgraded community infrastructure. This might not only be to the benefit the new community but also the existing community ('planning gain').

Figure A is taken from the Green Belt Review Sustainability Assessment (2022) and accounts for distance to: a bus stop (also bus frequency); a railway station; a primary school; retail; and a doctors surgery. Whilst a clear limitation is its focus only on the Green Belt, it is nonetheless helpful and relevant given that accessibility levels are generally higher in the countryside beyond the Green Belt and (in particular) the western urban area.

Figure A: Green Belt accessibility heat map



## Air quality

Sustainability objectives include:

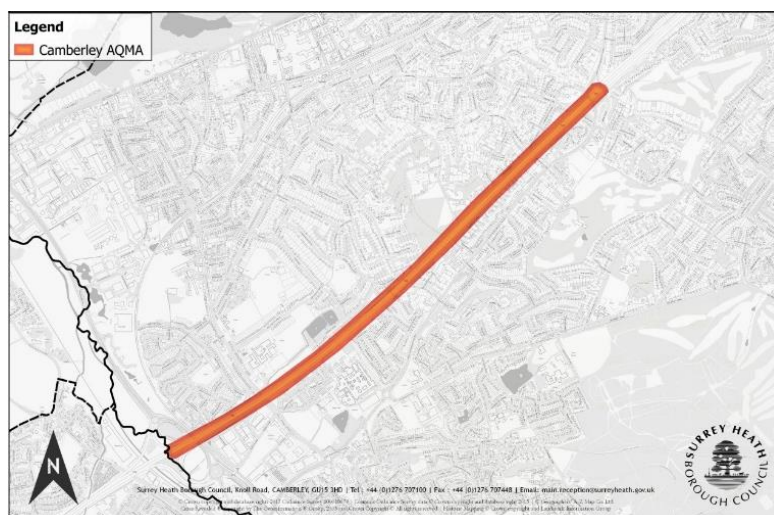
- Ensure air quality continues to improve in line with national and/or WHO global targets
- Reduce noise pollution

A key issue is the need to minimise car movements through air pollution hotspots; however, knowledge of air pollution hotspots is limited. There is only one Air Quality Management Area (AQMA) in the borough, although there are several others in neighbouring areas that must also be a consideration. The location of AQMAs can be seen at <https://uk-air.defra.gov.uk/aqma/maps/> and further important evidence comes from the Council's 2023 Air Quality Annual Status Report (ASR). Evidence from these sources is discussed in Section 9, above. One further key point to note is that electric vehicles tend to be heavier than ICE vehicles such that particulates pollution from road and tyre wear and brake dust are likely to continue to be a significant issue over the coming years.

Aside from air quality, there are also wider environmental quality considerations, most notably noise pollution. There can be a tendency to direct growth to locations in proximity to main roads and railway lines, as these can be more accessible locations or locations associated previously developed or otherwise lower quality land.

The figure below shows the extent of the borough's one AQMA, which is associated with the M3 motorway.

Figure B. Approximate boundary of Camberley AQMA



## Biodiversity

Sustainability objectives include:

- Conserve and enhance the Borough's biodiversity
- Ensure the protection of the Special Protection Areas (SPAs)

Biodiversity is a key constraint locally, given the extent of the Thames Basin Heaths SPA. Impacts to the SPA are a focus of a standalone Habitats Regulations Assessment (HRA), but it is also appropriate to explore SPA matters within this SA Report. Aside from the TBHSPA, there is also one nationally important SSSI, namely the Basingstoke Canal, and there are many locally designated Sites of Importance for Nature Conservation (SINCs).

There is also extensive priority habitat (of various types), which is not formally designated, but shown by a national dataset (maintained by Natural England) to likely have biodiversity value (albeit recognising that the dataset has its limitations). Deciduous woodland priority habitat is a particular consideration, but the borough is also associated with significant heathland and wood pasture priority habitat outside of designated sites.

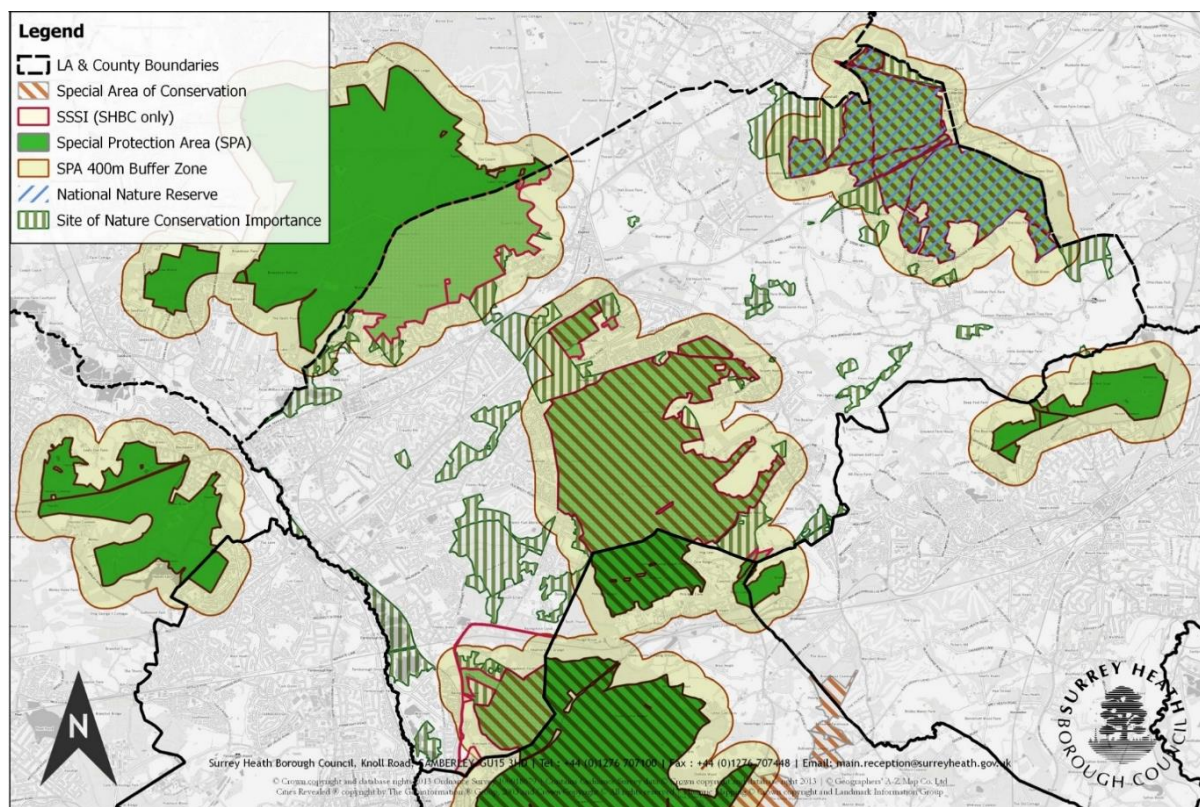
Beyond known priority habitat, it is also possible to identify areas likely to comprise habitat of value or note, including areas of woodland, forestry and scrub, plus of course hedgerows are of biodiversity importance (historic mapping can be interrogated to understand more) as are copses and individual trees, particularly veteran trees, and there is also a need to take note of individual and area Tree Protection Orders (TPOs).

Finally, looking beyond known areas of valued habitat, there is a need to consider intervening areas of land that could – now or in the future - have a value in terms of supporting landscape-scale habitat connectivity. This is an important factor in general, in support of healthy species populations, and supportive of climate change resilience.

Another factor is the national requirement for development to achieve 10% biodiversity net gain, and the emerging local policy approach of requiring 20%. This is clearly a positive step, from a biodiversity perspective; however, there remains a need to ensure a clear focus on the mitigation hierarchy, i.e. avoiding impacts in the first place ahead of seeking to mitigate or compensate for impacts. There naturally remains a degree of uncertainty around the efficacy of the new biodiversity net gain regime, particularly ahead of the forthcoming Surrey Local Nature Recovery Strategy (LNRS) which will ensure a strategic approach is taken to directing offsite interventions, i.e. steps taken to generate biodiversity credits that are then available to be purchased by developers, where it is the case that the developer is unable to demonstrate that the requisite BNG can be achieved onsite.

The figure below shows the key local biodiversity designations.

Figure C: Biodiversity designations in Surrey Heath



## Climate change adaptation

Sustainability objectives include:

- Minimise the risk of flooding
- Encourage reduced water consumption

There are very wide ranging climate change adaptation / resilience considerations that are somewhat of relevance to the local plan, but in terms of the great majority it is difficult to envisage the local plan leading to 'significant effects', with key decisions associated more with subsequent masterplanning and design work. A review of relevant climate change adaptation considerations was presented in [Appendix 1](#) of the Climate Change Study (2020).

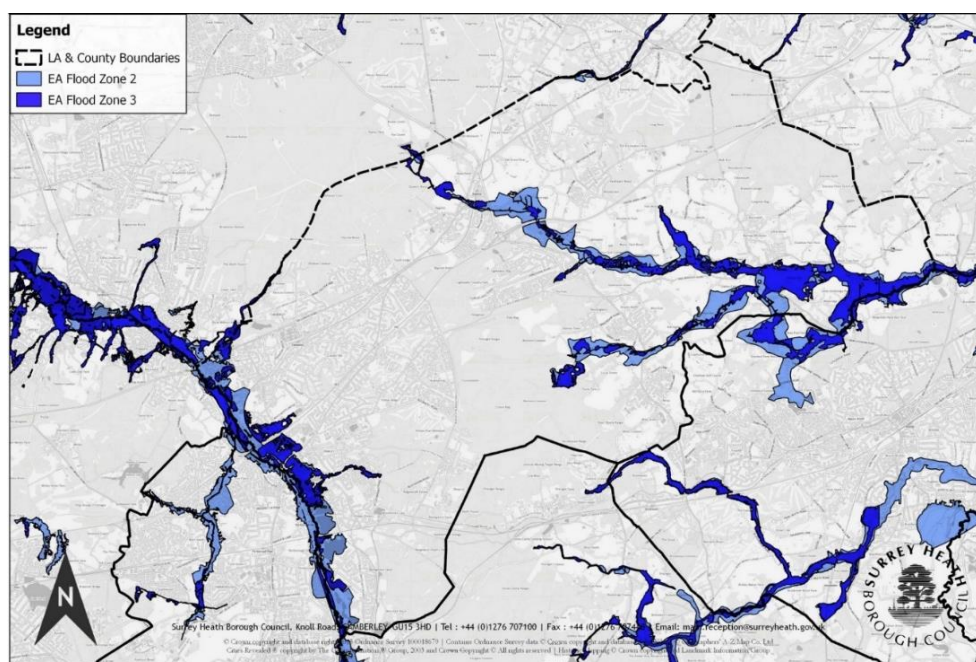
In this light, it is appropriate to focus on flood risk, as a key climate change adaptation consideration. Known flood zones are predicted to expand under climate change scenarios, and the frequency and intensity of flooding within flood zones could also worsen. Fluvial flood risk is a key consideration, but there is also a need to consider a range of other types / sources of flood risk, most notably surface water flooding. Also, it should be noted that there can be something of a grey area when distinguishing between fluvial and surface water flood zones.

Flood risk issues are explored within a Strategic Flood Risk Assessment (SFRA, 2021) and there is also a need to take close account of any concerns raised by the Environment Agency through consultation. There is essentially a need to ensure that a sequential approach is taken whereby development is directed to areas outside of flood zones ahead of areas within flood zones unless there is strong evidence to depart from this approach, accounting for the potential for mitigation (e.g. non-residential ground floor uses) and/or wider sustainability arguments for supporting the development, e.g. contributing to established objectives for the settlement in question.

Finally, it should be noted that there can be the potential for local plans to direct growth in support of natural flood management schemes, e.g. conversion of an area of arable land in a flood plain upstream of a settlement to accessible open space that is allowed to flood in the winter months, thereby reducing downstream flood risk.

The figure below shows fluvial flood zones in the borough.

Figure D. Flood risk in Surrey Heath



## Climate change mitigation

Sustainability objectives include:

- Reduce greenhouse gas emissions
- Increase energy efficiency and increase the use of renewable energy
- Encourage the use of more sustainable modes of transport and reduce traffic congestion

There is a need to take a systematic and structured approach to consideration of climate change mitigation / decarbonisation through local plan. This means firstly distinguishing between emissions from A) the built environment; and B) transport. The latter is likely the primary issue for local plans but can be a focus of discussion under other topic headings, notably Accessibility, Air quality and Transport. The former is also a key issue, and warrants being a stand-alone focus of attention under this Climate change mitigation heading.

Efforts to minimise built environment emissions often tend to focus on development management policy requirements, e.g. this was a focus of a Written Ministerial Statement released on 13<sup>th</sup> December 2023, and is a focus of considerable debate nationally at the time of writing. However, a focus on development management policy risks overlooking opportunities to minimise per capita emissions through spatial strategy / site selection (N.B. it is per capita emissions that must be the focus, as opposed to total emissions within the borough, albeit there is also a need to consider total emissions within the borough, given an ambition to achieve net zero by 2030).

There are a number of ways to minimise per capita built environment emissions through spatial strategy / site selection, although it is generally the case that there is limited guidance, and generally limited understanding nationally in respect of key issues and opportunities. Strategic sites can give rise to an opportunity over-and-above smaller sites, but this will not always hold true. Another factor is development viability, with it clearly being the case that there is the potential to achieve higher 'emission standards' where development viability is strong.

When considering built environment decarbonisation there is a need to differentiate between: A) operational (or ‘in use’) emissions; and B) non-operational emissions, which are typically referred to as embodied or embedded emissions. There is typically a focus on (A), and this is what is a focus of Building Regulations (Part L), but there is increasingly a national focus on (B), including with a focus on taking a ‘whole lifecycle carbon’ approach and aligning with ‘circular economy’ principles. In practice, (B) most significantly translates as a need to explore reuse of buildings ahead of demolition (and, in turn, design buildings for ease of reuse / refurbishment etc).

Focusing on operational built environment emissions, at any given development site there is a need to minimise emissions in line with the energy hierarchy, which means a focus on efficiency measures first and foremost (‘fabric first’), with residual energy use / emissions then minimised through onsite renewable energy generation (i.e. heat and power generation) as far as possible, and then with offsetting (i.e. offsite interventions) only as a last resort. Ideally these steps should lead to ‘net zero’ development, and net zero should ideally be achieved onsite (i.e. onsite renewable energy generation is at least equivalent to onsite energy use over the course of a year). However, if net zero development cannot be achieved then there is a need to set out clearly the extent to which emissions standards will be achieved that exceed the required standards set out in Building Regulations (which, it should be noted, are in the process of being tightened to a ‘Future Homes Standard’).

Finally, it should be noted that there is currently a live debate nationally regarding the approach that should be taken to reporting the performance of buildings / developments in respect of operational built environment emissions. The Buildings Regulations approach has well understood shortcomings, including as it involves calculating performance relative to a Target Emissions Rate (TER), and many industry specialists advocate an alternative approach, which involves calculating energy use in absolute terms (Energy Use Intensity, EUI).

Figure E: Two alternative approaches to measuring operational built environment emissions<sup>30</sup>

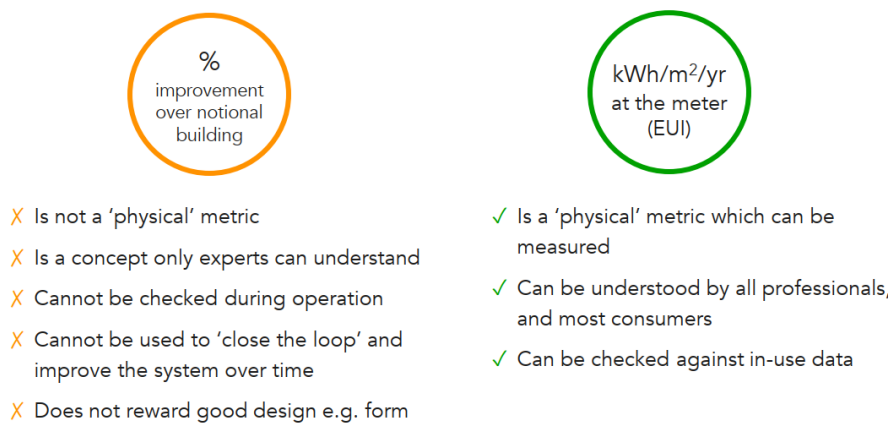
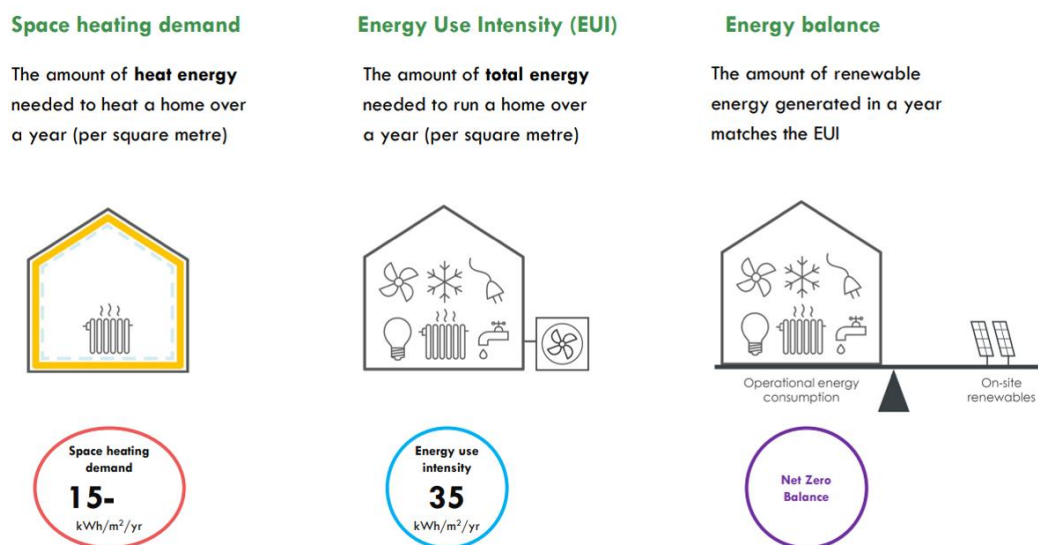


Figure F: An overview of the energy based / EUI approach to operational net zero (Source: LETI)



<sup>30</sup> Source: Delivering Net Zero: An evidence study to support planning policies which deliver Net Zero Carbon developments

## Communities

Sustainability objectives include:

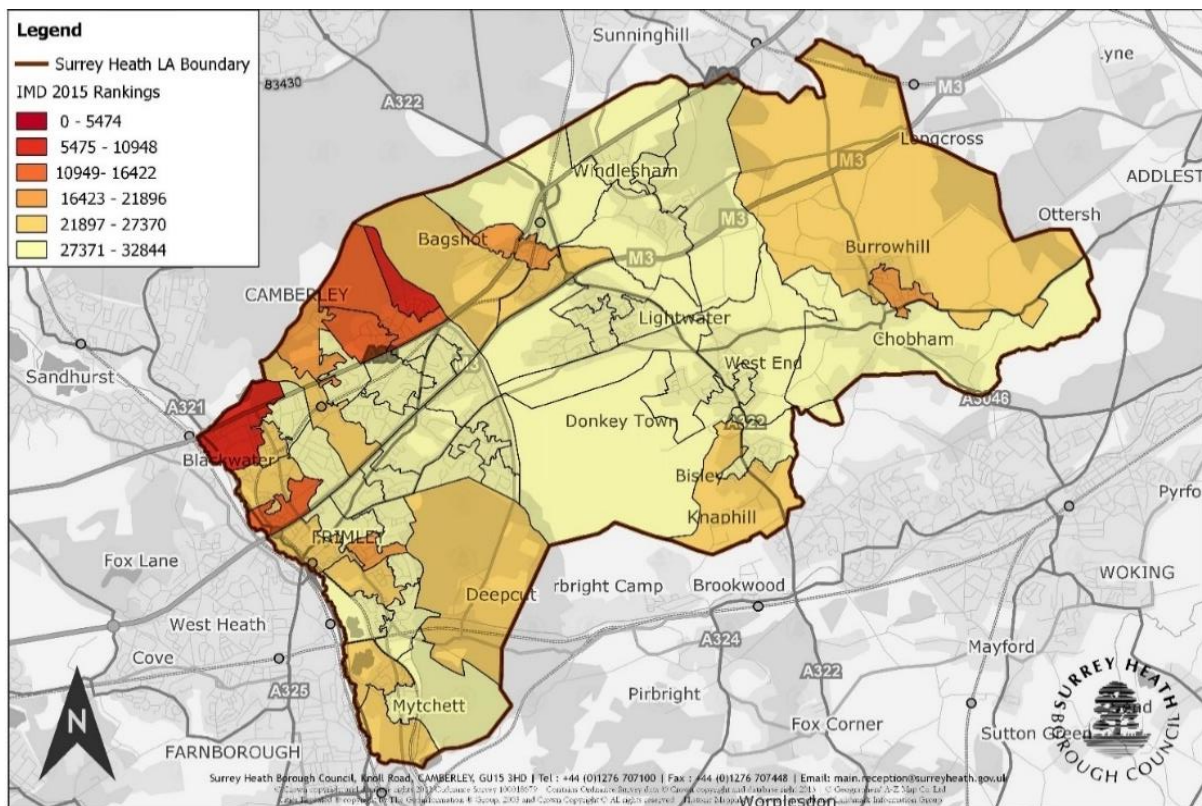
- Improve the population’s health
- Improve the education and skills of the local population
- Reduce crime, fear of crime and social exclusion
- Encourage the enjoyment of the countryside, open spaces and local biodiversity
- Sustain and enhance the viability and vitality of town, district and local centres

Discussion under this heading is an opportunity to consider wide-ranging communities-related issues and opportunities over-and-above those relating to access to community infrastructure, air / environmental quality, homes / accommodation and traffic / transport (all of which can be a focus under other topic headings). Access to green and blue infrastructure is another cross cutting issue that warrants mention here, but equally can clearly be suited to being a focus of discussion under the Accessibility, Biodiversity and Landscape topic headings.

One key consideration is reducing spatial inequalities across the borough. There are a wide range of factors in terms of which there can be spatial inequalities, but a key issue for local plans is relative deprivation, as understood from the Government’s Index of Multiple Deprivation (IMD). This is because local plans can direct growth so as to address relative deprivation, including by targeting delivery of employment, infrastructure and public realm improvements (including through ‘regeneration’ of existing urban areas or neighbourhoods that are performing poorly against indicators, and are potentially facing ongoing decline). Also, it is simply the case that the IMD shows clear spatial trends across the borough that the local plan can seek to respond to.

The figure below shows the IMD from 2015. There is now a more recent version available, dating from 2019, but the broad spatial trends are unchanged; see: [dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html).

Figure G: IMD Distribution for Lower Super Output Areas in Surrey Heath (2015 Rankings)



## Economy and employment

Sustainability objectives include:

- Support inclusive and diverse economic growth
- Maintain stable levels of employment in the Borough
- Support existing business structure and businesses
- Sustain and enhance the viability and vitality of town, district and local centres

Under this heading it is appropriate to focus on the key issues / opportunities highlighted through the Employment Land Technical Update (2023) also accounting for the accompanying Employment Supply Assessment (2023). These are a focus of discussion in the main report, such that they need not be elaborated upon further here. However, it is appropriate to present two supplementary figures – see below. The first shows trends in respect of office floorspace whilst the latter shows trends in respect of industrial floorspace. One point to note is recent trends across the South East in respect of increasing industrial floorspace that have not been seen in Surrey Heath (although it is important to note that this is an evolving picture, with significant new industrial land supply having gained planning permission since the work underpinning the figures below was undertaken).

Figure H: Indexed office floorspace change (2000/01 – 2020/21)

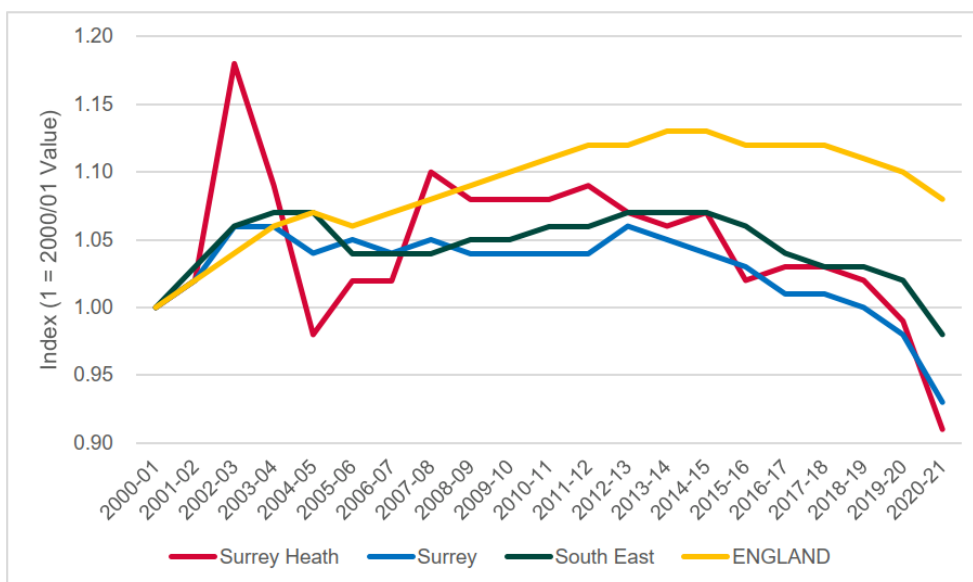
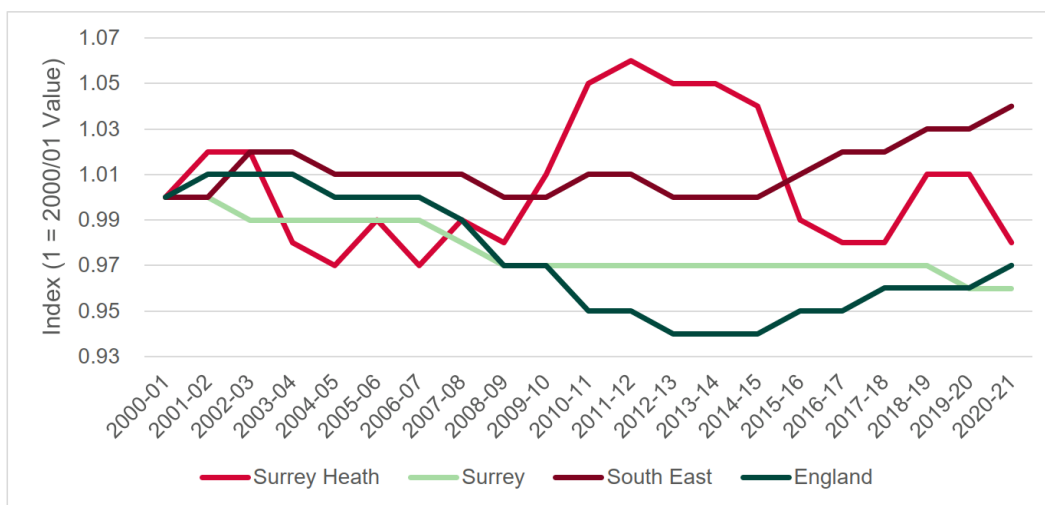


Figure I: Indexed industrial floorspace change (2000/01 – 2020/21)





## Historic environment

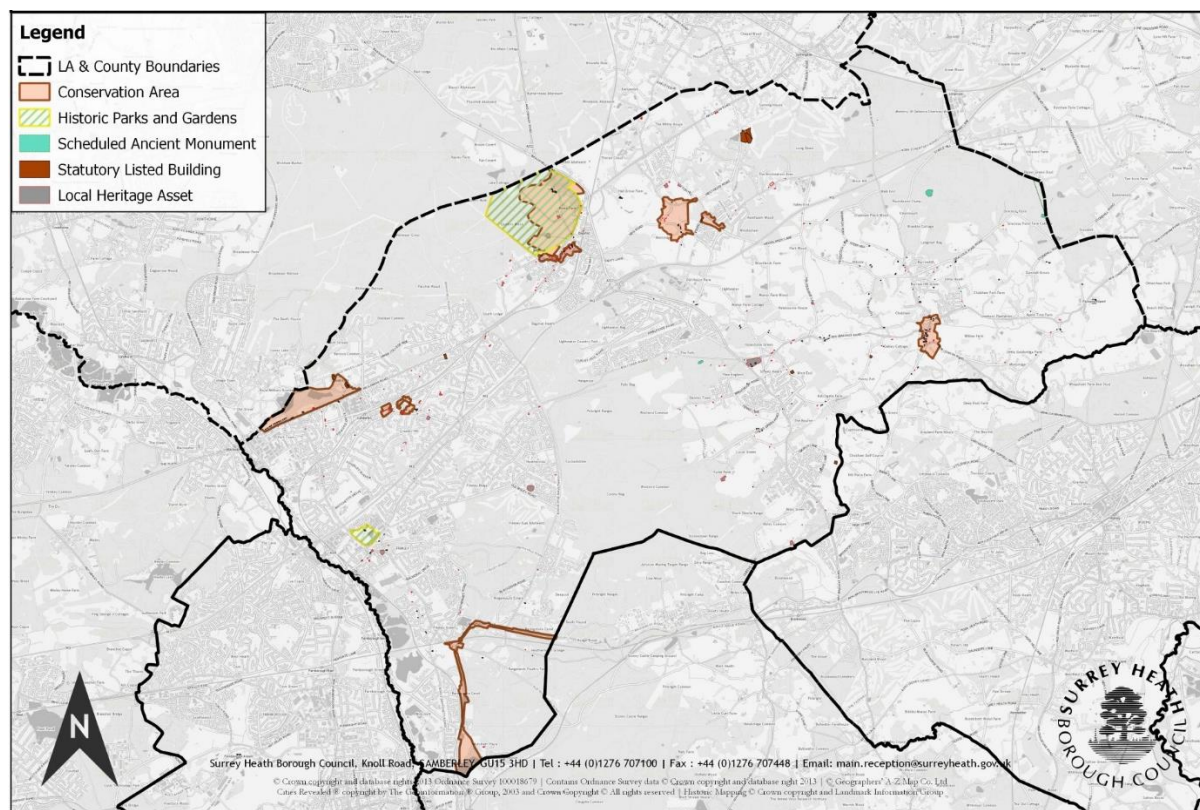
Sustainability objectives include:

- Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings

Key issues and objectives in respect of the historic environment are quite well understood, including on the basis of guidance and bespoke advice provided by Historic England. There is a need to both conserve and enhance the historic environment, with a focus on designated assets, but also non-designated assets (including archaeology). As part of this, there is a need to account for specific factors that make an asset or area valuable in historic environment terms, and the setting of historic assets is often a key consideration. There is a need to consider clusters of assets and the reasons for clustering (e.g. along historic transport corridors or reflecting historic land uses) and more broadly consider links between assets and the wider landscape. In turn, there is a need to consider historic character at landscape scales, and this can link to objectives around sense of place and place-making.

The figure below shows key designated assets (including designated areas), and it should also be noted that the Council recently [consulted](#) on a Draft Local List, i.e. a proposed list of locally designated assets.

Figure J: Cultural heritage designations in Surrey Heath



## Housing

Sustainability objectives include:

- Meet identified housing need

Under this heading it is appropriate to focus on the key issues / opportunities highlighted through the Local Housing Need Assessment (LHN, 2023), which gives consideration to: overall housing need; affordable housing need, the private rented sector; housing mix; older and disabled persons housing needs; and the needs of other specific groups. Also, there is a need to focus here on providing for Gypsy and Traveller Accommodation needs.

Issues and opportunities are a focus of discussion in the main report, and LHNA Executive Summary also provides an accessible overview, such that there is no need to elaborate further here. However, it is appropriate to present a series of supplementary figures – see below. This is simply a selection of key figures from the LHNA.

Figure K: Annual net housing completions in Surrey Heath (2011-23)<sup>31</sup>

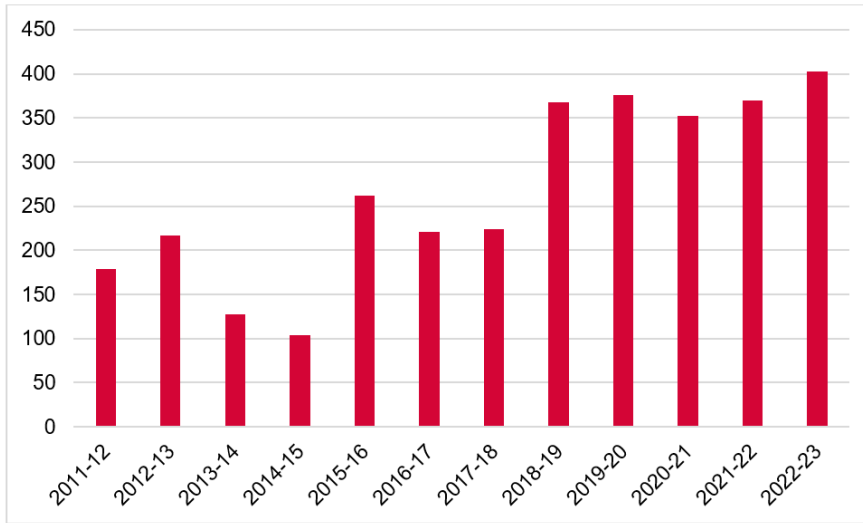


Figure L: Median affordability ratio (1997-2022)<sup>32</sup>

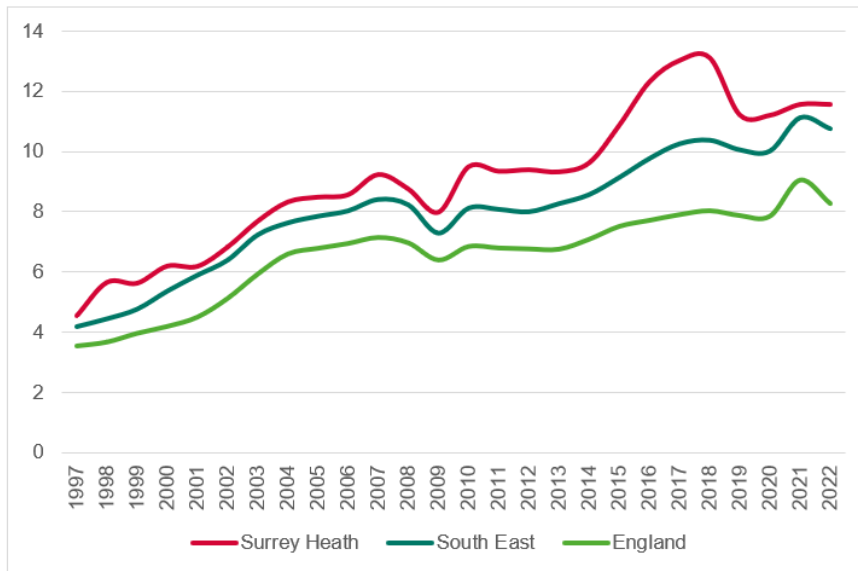
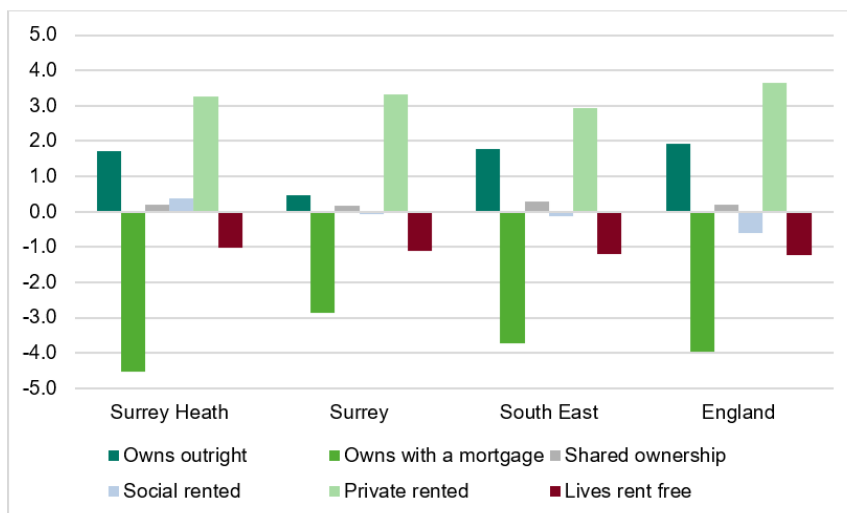


Figure M: Changing tenure profile 2011-2021



<sup>31</sup> For context, housing need is currently understood to be 321 dwellings per annum (dpa)

<sup>32</sup> This is the ratio of house prices to local salaries

Figure N: Change in household spaces by bedrooms (2011-2021)<sup>33</sup>

	2011	2021	Change	% of Total Change
1 bedroom	2,686	3,136	450	18.3%
2 bedrooms	6,260	6,865	605	24.6%
3 bedrooms	12,252	12,323	71	2.9%
4 or more bedrooms	12,348	13,684	1,336	54.3%
Total	33,546	36,008	2,462	100.0%

Figure O: Bedroom based occupancy rating (2021)<sup>34</sup>

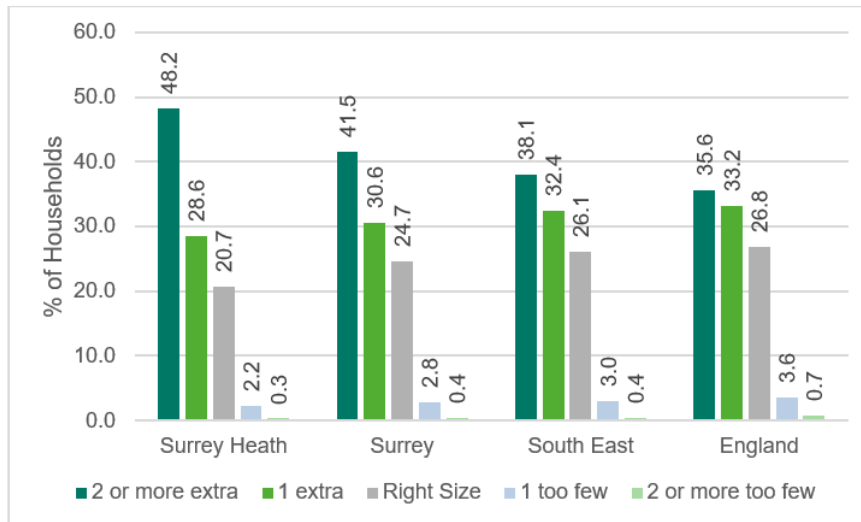
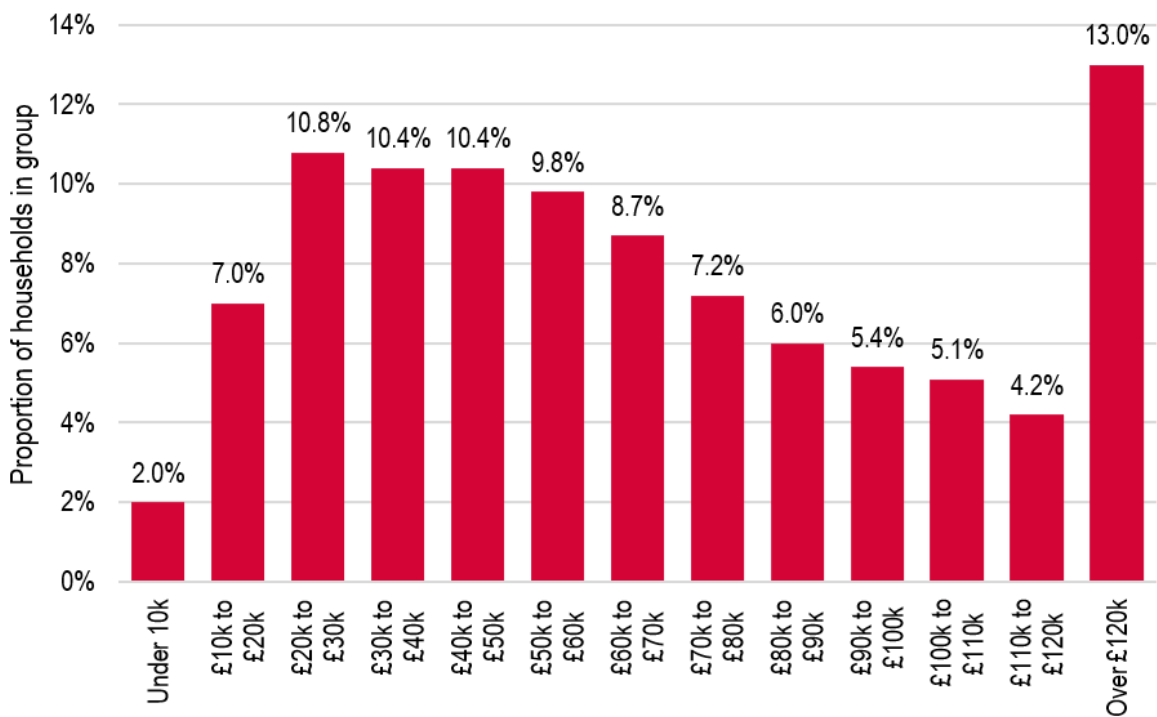


Figure P: Distribution of household income in Surrey Heath (2022)<sup>35</sup>



<sup>33</sup> This suggests a possible need to support more small family homes (three bedrooms).

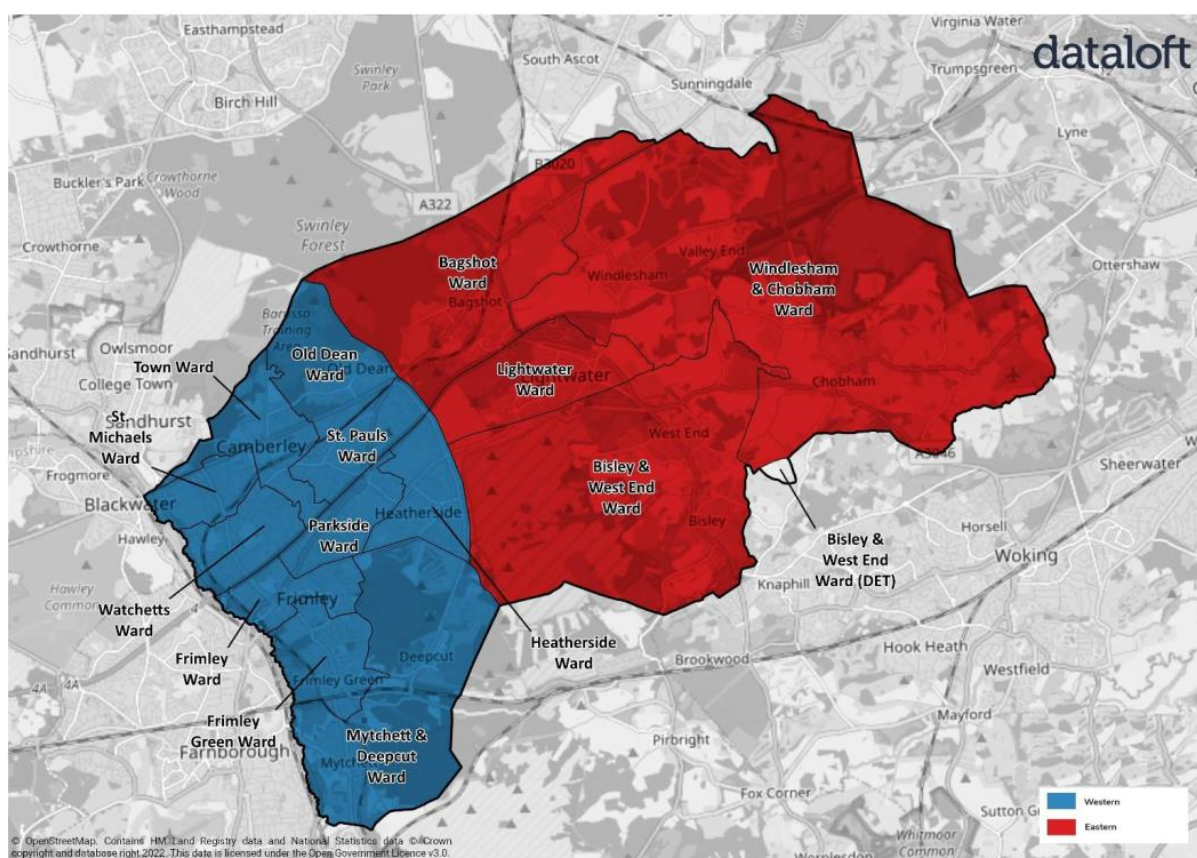
<sup>34</sup> A high proportion of homes are under occupied, suggesting a need to support downsizing.

<sup>35</sup> This is presented as context to consideration of affordable housing needs.

Figure P: Households in need of affordable housing by category<sup>36</sup>

	Western Urban	Rest of Borough	TOTAL
Concealed and homeless households	467	162	629
Households in overcrowded housing	719	248	966
Existing affordable housing tenants in need	56	20	75
Households from other tenures in need	506	237	743
<b>TOTAL</b>	<b>1,691</b>	<b>646</b>	<b>2,338</b>

Figure Q: Two distinct development viability zones (from the Viability Assessment, 2024)<sup>37</sup>



## Land, soils and resources

Sustainability objectives include:

- Make the best use of previously developed land (PDL) and existing buildings
- Reduce contamination and safeguard soil quality and quantity
- Reduce generation of waste and maximise re-use and recycling

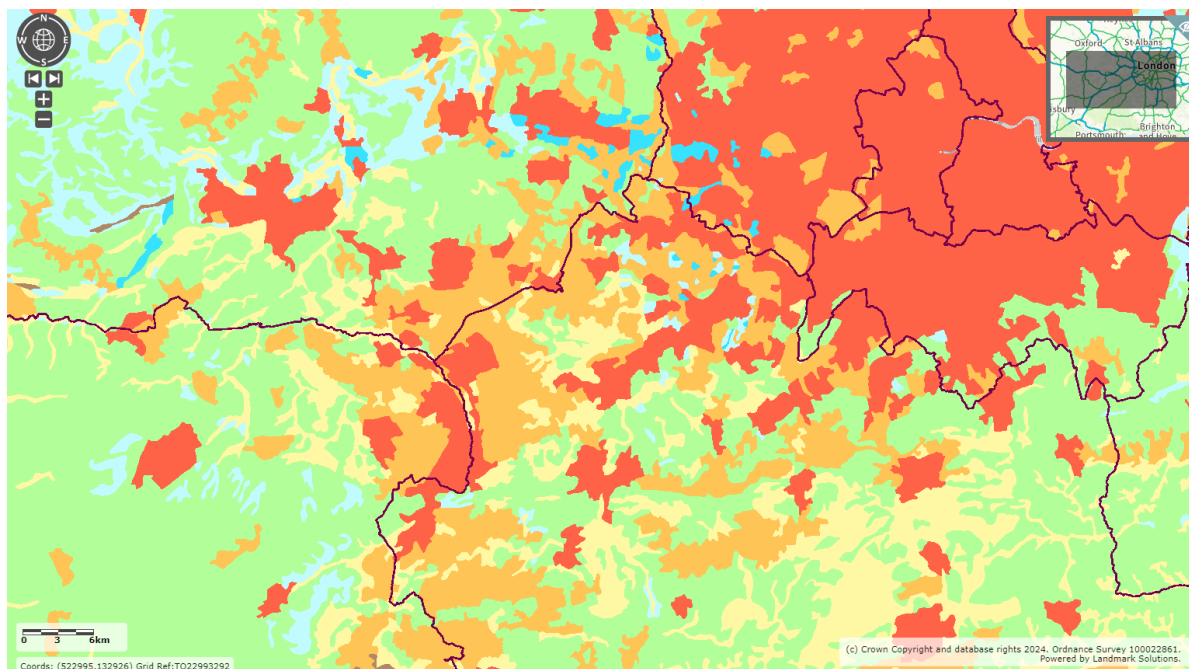
A key issue for local plans is often avoiding the loss of productive agricultural land, particularly best and most versatile land, which is that classified as Grade 1, 2 or 3a. However, there are also wider issues for consideration, including avoiding the sterilisation of minerals resources, and another factor can potentially be taking steps to support sustainable waste management, including by supporting the objectives of the Surrey Minerals and Waste Local Plan. It is also clearly the case that there is a need to make more effective use of brownfield land, and avoiding issues in respect of contaminated land, and supporting land remediation, can be another consideration.

<sup>36</sup> This is presented as context to consideration of affordable housing needs.

<sup>37</sup> Affordable housing need is highest in the western urban area, but viability is a challenge to affordable housing delivery.

The figure below is a screenshot taken from [www.magic.gov.uk](http://www.magic.gov.uk) showing agricultural land quality to the west of London. County boundaries are shown, with Surrey Heath located at the northwest extent of Surrey. The extent of amber/beige as opposed to green/blue shows that agricultural land quality is generally poor in the vicinity of Surrey Heath, reflecting the surface geology that gives rise to the Thames Basin Heaths. However, there is some Grade 3 quality land to the west of Chobham.

Figure Q. Agricultural land quality to the west of London (also showing county boundaries)



## Landscape

Sustainability objectives include:

- Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
- Maintain and enhance the quality of countryside, Green Belt and open space areas

There are no nationally designated landscapes intersecting the borough, but there is notably varying landscape character and sensitivity, which must inform spatial strategy and site selection, informed by the Landscape Sensitivity Assessment (2021).

Another clear consideration is the extent of woodland, forestry and other mature trees, including extensive areas with Tree Protection Orders (TPOs). On the one hand, this can serve to screen and contain growth locations in the landscape. However, on the other hand, integrating trees within development sites is a widespread issue.

Finally, there is a need to not the extent of the Green Belt, which whilst not a landscape designation, is indicative of land that is valued for its openness, and where there are sensitivities around the encroachment of development into the countryside and maintaining clear separation between settlements.

The same can also be said for much of the Countryside Beyond the Green Belt (CBGB), as established through the Green Belt and Countryside Study (2017).

The figures presented below are from the Study and show contribution to two key Green Belt purposes across both the Green belt and the CBGB. However, it is important to note that subsequent work has been undertaken to examine more detailed parcels, showing that there are some detailed parcels that perform less strongly.

Figure R. Landscape sensitivity within broad character areas

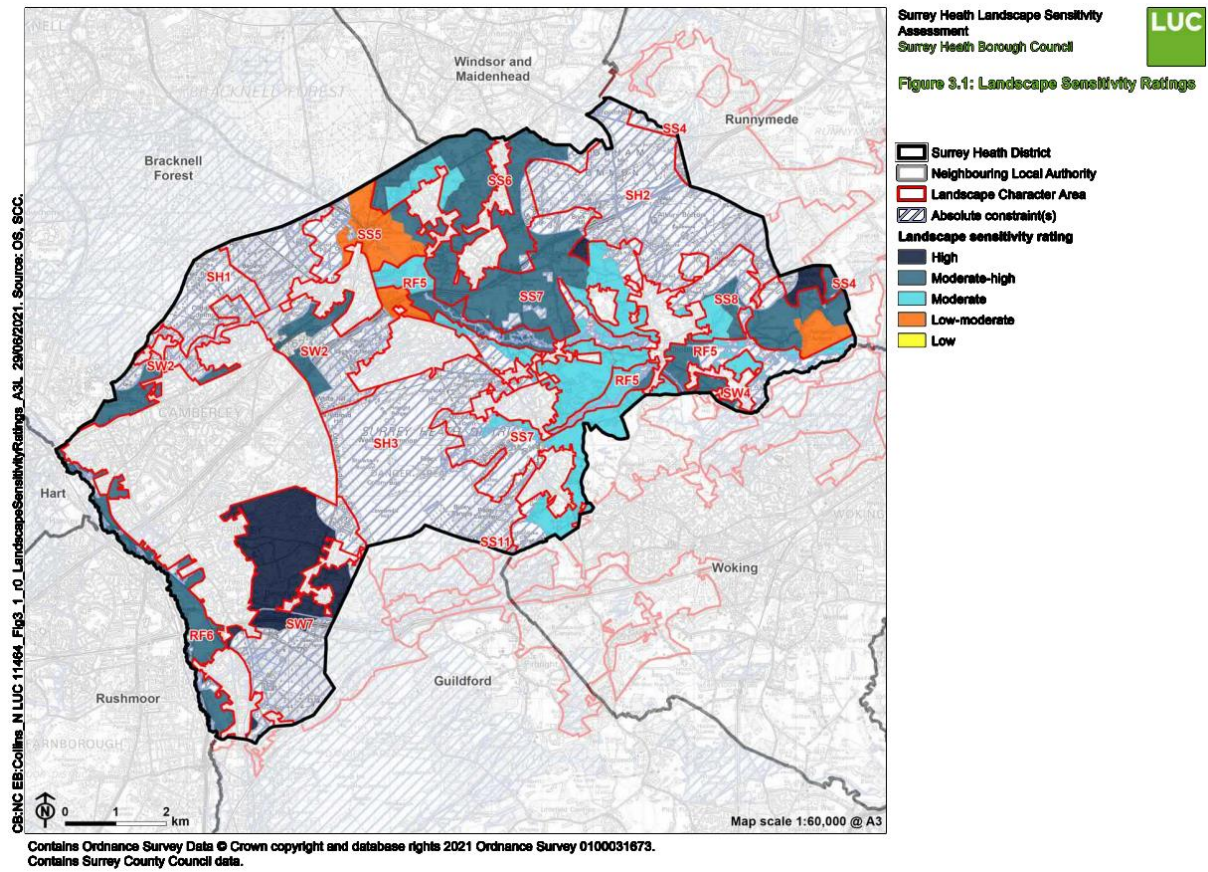


Figure S. Contribution of broad parcels within the Green Belt and CBGB to 'towns merging' GB purpose

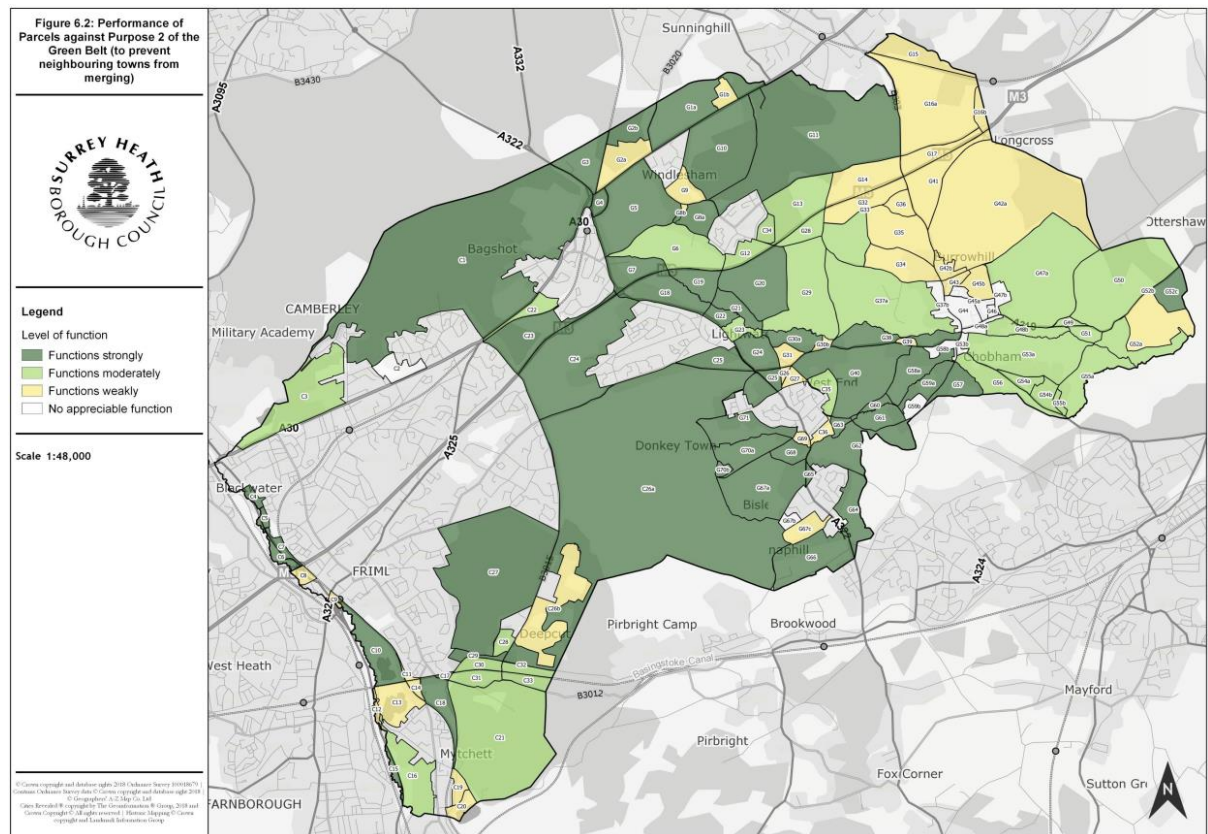
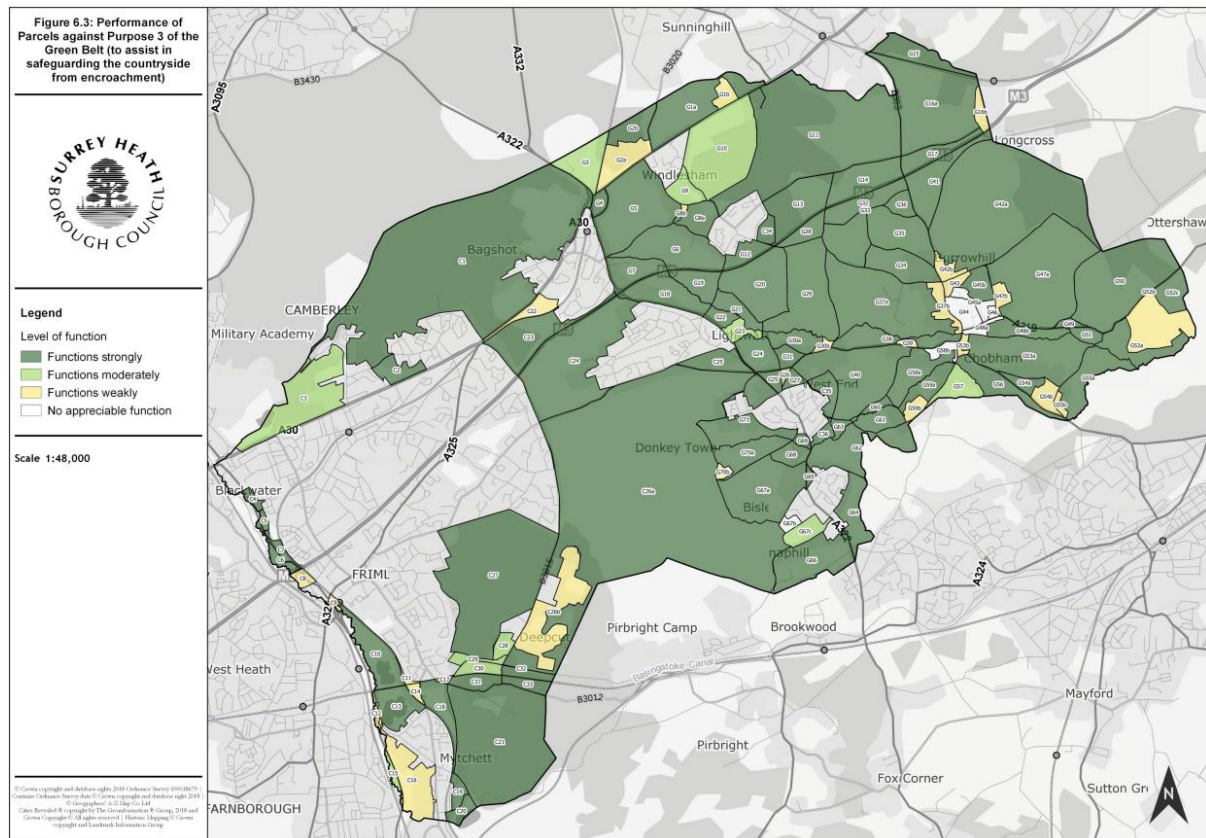


Figure T. Contribution of broad parcels within the Green Belt and CBGB to ‘countryside encroachment’ GB purpose



## Transport

Sustainability objectives include:

- Encourage the use of more sustainable modes of transport (public transport/cycling/ walking) and reduce traffic

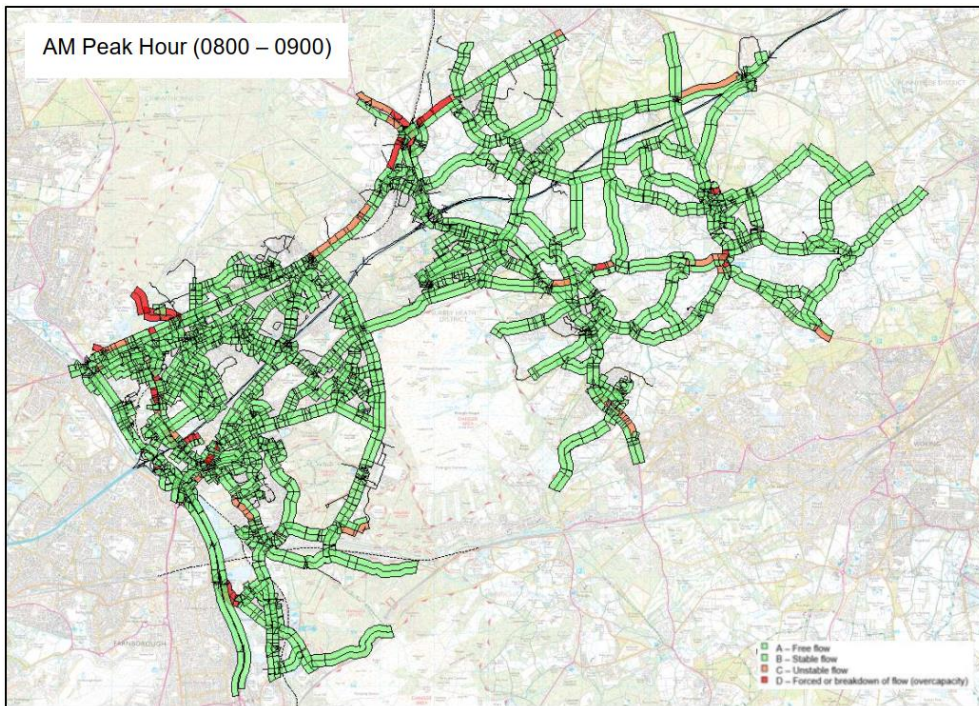
Transport is clearly a key issue for any local plan. There is a need to be guided by latest:

- National policy – e.g. DfT Circular 01/2022, which places a major emphasis on ‘sustainable transport’ interventions ahead of delivering upgrades to the strategic road network (as managed by National Highways).
- Regional policy – a Transport for the South East Strategy was published in 2020 and is now being updated.
- Surrey County Council policy – most notably Local Transport Plan 4, plus SCC is working with districts and boroughs to deliver Local Cycling and Walking Infrastructure Plans (LCWIPs).

Key evidence comes from the Highways Assessment (2024), which is quoted extensively in the main body of this report. It identifies limited concerns associated with the emerging growth strategy, but there remain uncertainties ahead of further work on mitigation schemes and then securing funding to deliver the schemes in practice.

The figure below is one of several figures within the Assessment that examine capacity along roads and at junctions at either the AM or PM peak times under a ‘do something’ scenario, i.e. assuming the local plan is adopted with a strategy as per the emerging preferred approach. The looks at flow on roads in the AM peak, but the PM peak shows a very similar pattern. It can be seen that Bagshot is a notable hotspot.

Figure U. Flow along roads under a do something scenario in the AM peak



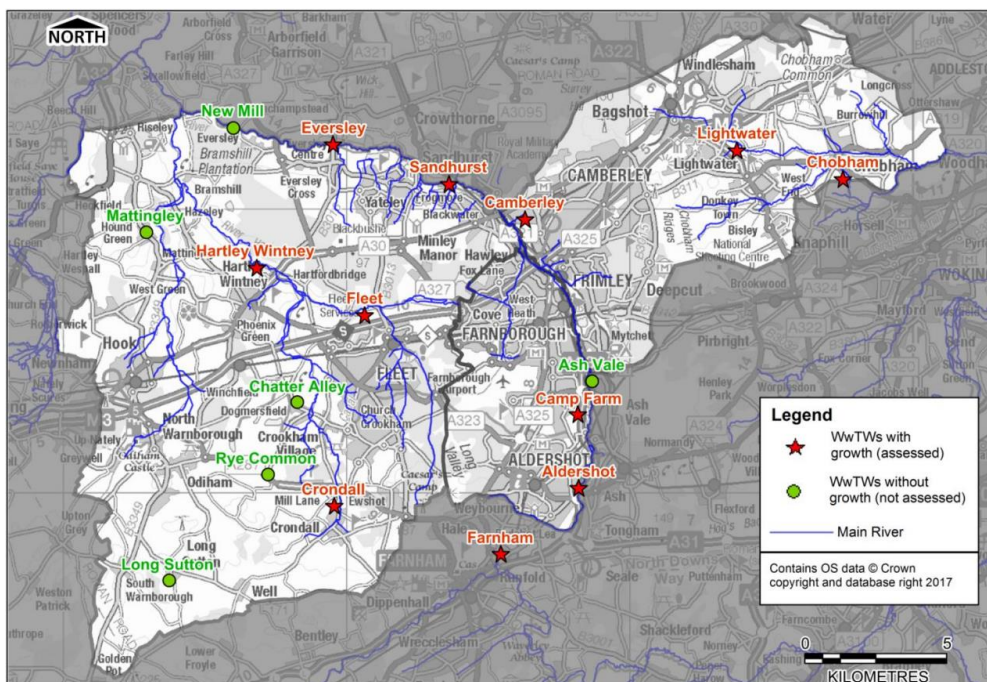
## Water

Sustainability objectives include:

- Maintain and improve the quality of water resources
- Encourage reduced water consumption

A Water Cycle Study (WCS) was published for Surrey Heath, Hart and Rushmoor in 2017, but is now somewhat dated, given assumptions made regarding likely growth locations. A key issue is invariable capacity at Wastewater Treatment Works (WwTWs), but WCS also typically look at: water resource availability (e.g. abstraction leading to low flows); wastewater collection (i.e. the sewer network); and wider issues relating to water quality (including relating to SuDS, and accounting for the status of waterbodies under the Water Framework Directive).

Figure V. WwTWs across the area covered by the WCS (2017)





# Appendix III: DM policy alternatives

## Introduction

As discussed in Section 4, whilst work to explore reasonable alternatives has mainly focused on the matter of the spatial growth strategy ('growth scenarios'), consideration has also been given to reasonable alternatives in respect of other, more specific aspects of the plan, including specific development management (DM) policy areas / issues. It is inherently challenging to identify DM policy reasonable alternatives (RAs); however at the Regulation 18 Draft Plan stage the decision was taken to formally define, appraise and consult upon two sets of DM policy RAs, namely: 1) Built environment decarbonisation; and 2) Biodiversity Net Gain (BNG).

Appraisal findings were presented in Appendix III of the Interim SA Report (2022).

At the current time the decision has been taken to focus on BNG RAs only. With regards to built environment decarbonisation, this is a fluid and fast evolving policy area nationally, and the situation has moved on considerably since 2022. Detailed discussion is presented in appraisal sections of this report (Sections 6 and 9), but it is no longer clear that there are reasonable alternatives for appraisal and consultation.

## Biodiversity net gain

### Introduction

The aim here is to discuss "outline reasons for selecting the alternatives dealt with", present an appraisal of reasonable alternatives and then present SHBC officers' reasons for supporting the preferred option.

### Selecting reasonable alternatives

There is now a national requirement to achieve 10% BNG under the Environment Act (2021), but it is quite common for local authorities to seek a higher requirement – typically 20% – through policy in the local plan. As of January 2024, it was reported that 20 local authorities had adopted or were seeking to adopt a policy requirement for >20% BNG. However, in February 2024 the Planning Practice Guidance (PPG) was updated to explain that local plans:

*"... should not seek a higher percentage than the statutory objective of ten per cent biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified".*

*... To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented."*

The Council proposed a 20% BNG requirement through the Draft Plan consultation in 2022. The decision to take this approach was informed by an appraisal of reasonable alternatives (RAs), which simply highlighted that, whilst a 20% BNG requirements is clearly supported from a biodiversity perspective, there would be development viability implications that could impact on affordable housing delivery and feasibly even lead to developments being made unviable, such that a 10% requirement was preferable from a 'housing' perspective (N.B. the 10% national requirement had not yet come into force). There were some concerns raised by the development industry through the consultation, including by the Home Builders Federation (HBF), who highlighted the viability implications and also sought to emphasise the importance of a clear and consistent policy environment nationally.

In this light, the Council has undertaken a considerable amount of work with a view to evidencing and ultimately justifying a 20% BNG requirement. This includes a Viability Assessment (2024), which assumes that a 20% requirement would lead to an additional cost of £1,187 per home on greenfield sites and £259 on brownfield sites, but states that these figures are conservative estimates.

The Viability Assessment does not flag any concerns with a 20% BNG requirement; however, that is not to say that the additional viability 'headroom' created by a 10% requirement would not lead to benefits, e.g. increased scope for affordable housing. It would also lead to a degree of increased certainty in respect of being able to deliver net zero developments, albeit quite possibly marginal. The Viability Assessment notably explains:

*"No costs have been allowed in our appraisals to meet [net zero development] requirements, but we instead comment on headroom to meet these policy costs. This is because there is on-going research being carried out by Surrey County Council on the technical and economic viability implications of achieving net zero carbon..."*

As well as the question of development viability, there is also a need to consider “how the policy will be implemented” (see PPG quote). As part of this, there is a need to note that the emerging proposed strategy is broadly one of small / modest sized sites (also two large town centre regeneration schemes) and, as explained within the Viability Assessment: “*Larger (in land area) typologies and strategic allocations would be expected to deal with BNG on site, with the response designed in at the outset.*”

The Council has undertaken a considerable amount of work around this, and the work undertaken is considered to be at the forefront of emerging good practice nationally. The emerging proposed allocations have all been scrutinised to establish the number of biodiversity credits that will need to be delivered off-site, after having taken steps to minimise impacts (i.e. habitat loss or deterioration) and generate credits onsite (i.e. habitat creation or enhancement) onsite. This work has also sought to take account of the types of habitats involved.

Armed with this understanding, the Council has then considered the potential to deliver offsite credits locally, and specifically within the borough (although in practice there can be flexibility to generate offsite credits at a wider landscape scale, informed by the emerging Surrey Local Nature Recovery Strategy, LNRS). This has served to highlight significant opportunities, most notably at Windlemere SANG, where detailed work has been undertaken to evidence the potential to deliver the requisite biodiversity credits (a ‘habitat bank’) to allow the emerging proposed strategy to be delivered with 20% BNG, despite the fact that many sites will be unable to deliver 20% BNG onsite.

In this light, it is arguably the case that there is now very little to be gained from formally appraising 10% versus 20% BNG. This is also the case recognising that the equivalent appraisal presented in the Interim SA Report (2022) essentially was able to go little further than stating the obvious (i.e. BNG is good for biodiversity, but has viability implications, which could have knock on effects for sustainability objectives, particularly housing-related).

However, on balance it was considered reasonable and appropriate to present an appraisal of the options as per the Interim SA Report (2022). Specifically, the appraisal table below presents an appraisal of:

- **Option 1** – 10% BNG (i.e. simply defer to the legal requirement)
- **Option 2** – 20% BNG

### Alternatives appraisal findings

The aim of this section is to present an appraisal of the alternatives introduced above. With respect to methodology, for each of the topics that together comprise the SA framework (i.e. across each of the rows in the table below), the aim is to: 1) rank the scenarios in order of preference; and 2) categorise the performance of each scenario in terms of significant effects (**red** / **amber** / **light green** / **green**).<sup>38</sup>

### Selecting the preferred option

The following text is provided by SHBC officers:

**Option 2** is the preferred option. The 20% requirement exceeds the 10% national requirement, but is evidenced and justified in the Surrey Heath context, accounting for the Viability Assessment (2024), detailed work undertaken to examine the proposed local plan allocations and the potential to deliver offsite biodiversity credits (particularly at Windlemere SANG) and also in the context of the State of Surrey’s Nature report (2017), which shows that loss of biodiversity in Surrey is a particular issue, i.e. the local picture is worse than the national.

It is recognised that 20% BNG will result in an additional cost being imposed on developers, but this is relatively modest, and is not likely to have a significant bearing on overall development viability or lead to arguments for comprising on wider sustainability / planning objectives, e.g. in respect of affordable housing or net zero development. However, it is recognised that there will be a need to maintain a watching brief, including accounting for latest understanding of the costs involved.

Looking beyond viability considerations, there is no reason to suggest that a 20% BNG requirement will lead to a significant burden on developers, including because the Council is committed to working closely in support of effective implementation of the policy, including in respect of ensuring that offsite credits are easily available.

<sup>38</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

Table A: BNG alternatives appraisal

Topic	Option 1	Option 2	Discussion
Accessibility	=	=	<p><b>Pros of 20% BNG</b></p> <p>There are clear biodiversity arguments for seeking to go beyond the nationally prescribed minimum approach. Firstly, this is on the basis of rates of biodiversity loss in Surrey.<sup>39</sup> Secondly, there are naturally concerns regarding the BNG approach failing to achieve stated biodiversity objectives, and perhaps even resulting in perverse long-term effects that are currently difficult to foresee or fully appreciate, because approaches and methods are in their infancy, and recognising that a focus on BNG will be, to some extent, at the expense of a focus on more traditional approaches to biodiversity conservation and enhancement. For example, <a href="#">CIEEM</a> have discussed a concern that a 10% BNG requirement could be “within the margin of error”, such that it doesn’t deliver “real benefits” in practice. <a href="#">Also, ze Ermgassen et al. (2021)</a> highlight some significant concerns, including around a piecemeal approach to implementation of BNG through planning applications whereby the combined effect is less than the sum of its parts. Also, whilst the Government is regularly releasing new versions of the <a href="#">Biodiversity Metric</a>, e.g. looking to address methodological challenges such as around accounting for additionality (any gains that are accounted for must be in addition to what would have happened in any case), there is uncertainty about the timing of the <a href="#">Surrey Local Nature Recovery Strategy</a>, which will be crucial to ensuring that offsite habitat creation / enhancement is strategically targeted. At the time of writing no LNRS has been published nationally.</p> <p>Also, there is a need to recognise that an ambitious approach to BNG will translate into additional ecosystem service benefits to communities, for example in terms of recreation and flood risk.</p> <p><b>Cons of 20% BNG</b></p> <p>A 20% BNG requirement does not give rise to any notable tensions with sustainability objectives other than in the sense that it will result in a burden on developers, in terms of cost and potentially also administration (particularly for sites being taken forward by an SME developer / house-builder). This could feasibly result in development being delayed or not coming forward (in short, not coming forward as anticipated by the local plan housing trajectory) or could lead to development coming forward with compromises made in respect of wider sustainability objectives, e.g. affordable housing or net zero. It is fair to flag a possible risk, particularly in terms of housing objectives. However, there is no evidence to suggest a significant concern. The Viability Assessment (2024) does not highlight any concerns, the Council has undertaken detailed work to confirm the ability to deliver the requisite offsite biodiversity credits and the Council is committed to working with developers to ensure that they are able to easily access these credits.</p> <p>One other feasible consideration is a tension between SANG objectives (focused on access) and BNG objectives (focuses on biodiversity), recognising that the main proposed location for delivering offsite credits (i.e. the main proposed ‘habitat bank’) is also a SANG. However, there are no significant concerns, in light of the work that has been undertaken.</p> <p><b>Conclusion</b></p> <p>In conclusion, an ambitious approach to BNG is supported in respect of the majority of objectives, although there is an element of risk in respect of housing objectives. With regards to effect significance, it is possible to predict likely significant positive effects under Option 2 in respect of biodiversity, with other effects uncertain and likely of lower significance.</p>
[to community infrastructure]			
Air / env quality	=	=	
Biodiversity	2	1	
Climate change adaptation	=	=	
Climate change mitigation	=	=	
Communities and health	=	=	
Economy and employment	=	=	
Heritage	=	=	
Housing	1	2	
Landscape	=	=	
Land, soils and resources	=	=	
Transport	=	=	
Water	=	=	

<sup>39</sup> This is a key reason why a [Surrey Nature Partnership Position Statement](#) recommends 20% BNG. However, a preferable approach would be to undertake a national study to identify hotspot areas for biodiversity loss more suited to 20% BNG.

# Appendix IV: Chobham Green Belt RAs

## Introduction

As discussed in Section 4, whilst work to explore reasonable alternatives has mainly focused on the matter of the spatial growth strategy ('growth scenarios'), consideration has also been given to reasonable alternatives in respect of other, more specific aspects of the plan, including the question of inseting Chobham from the Green Belt.

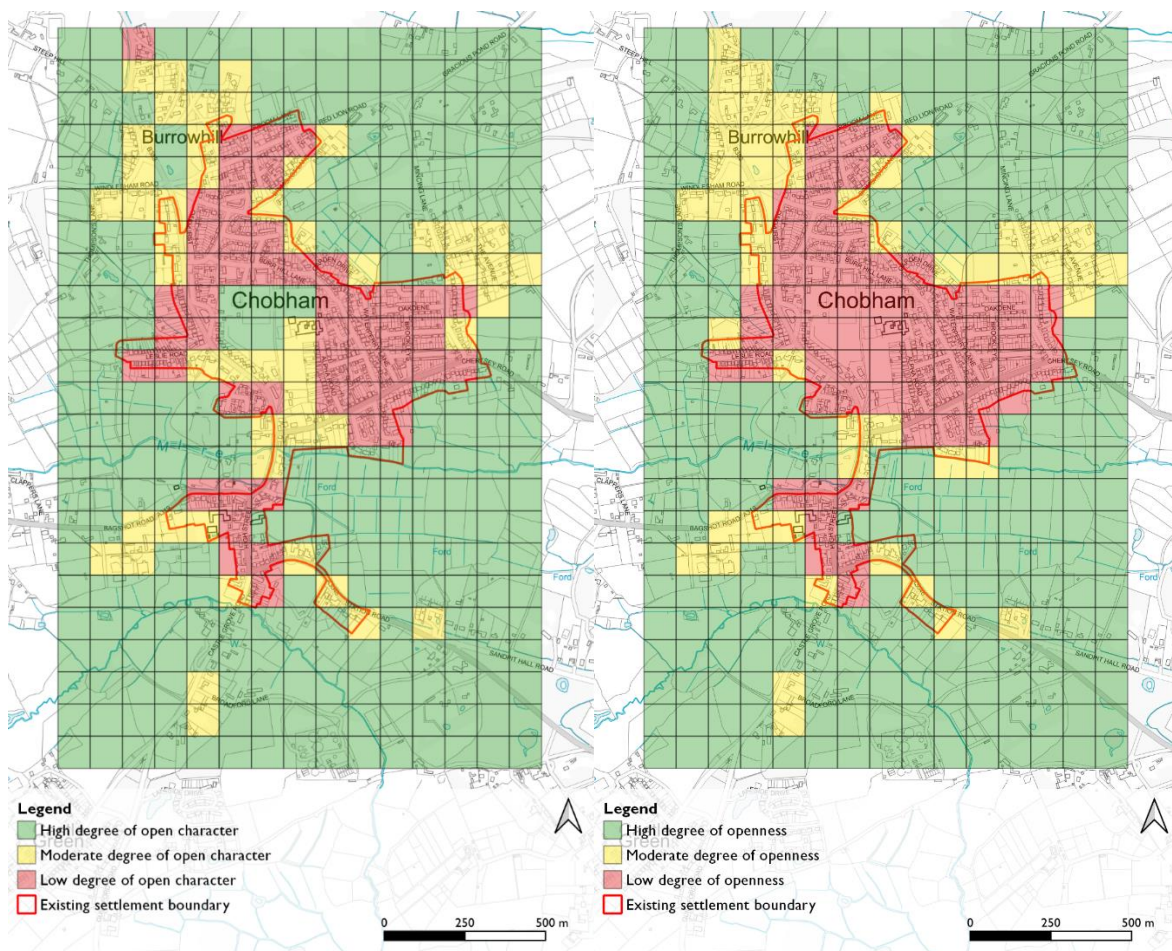
Appraisal findings were presented in Appendix III of the Interim SA Report (2022) and the appraisal findings from that stage broadly still hold true at the current time.

The aim of this appendix is to discuss "outline reasons for selecting the alternatives dealt with", present an appraisal of reasonable alternatives and then present SHBC officers' reasons for supporting the preferred option.

## Background

Chobham is currently 'washed over' by the Green Belt, as shown in Figure 2.1, at the start of this report, although it does have a defined settlement boundary. However, a Green Belt Village Study has now been completed, and concludes that much of the settlement does not exhibit an open character and does not contribute significantly to the openness of the Green Belt – see Figure A. As a result the Study sets out that the settlement should be excluded, or 'inset', from the Green Belt, as per the other villages in the east of the borough.

Figure A: Conclusions of the Green Belt Village Study



## Selecting reasonable alternatives

With regards to the question of whether or not Chobham should be inset from the Green Belt, there is a strong argument to suggest that there is only one reasonable option, in light of the available evidence, which is to inset.

However, because the issue is understood to be potentially somewhat contentious, the decision was made to appraise two reasonable alternatives:

- **Option 1** – leave Chobham village washed over by the Green Belt
- **Option 2** – inset Chobham village from the Green Belt

## Alternatives appraisal findings

The aim of this section is to present an appraisal of the alternatives introduced above. With respect to methodology, see discussion above, in Appendix III. Please note that Option 1 is essentially the baseline situation and so cannot give rise to significant effects (on the baseline).

Table A: Chobham village Green Belt – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Accessibility	=	=	It is difficult to differentiate between the alternatives with any degree of certainty, because whilst it is fair to assume that there would be some infilling / intensification of the built form, in the fullness of time, under Option 2, it is not possible to foresee where, or to what extent, this would occur in practice. N.B. the aim of this appraisal is not to consider the merits of specific sites, or any given specific approach to growth at Chobham through the local plan. Rather, the assumption, under Option 2, is that additional windfall development would come forward. The appraisal is undertaken mindful of growth at Chobham proposed through the draft Local Plan, including the proposed Rugby Club allocation for 91 homes. However, it is fair to highlight that Option 2 gives rise to tensions with historic environment objectives, over-and-above Option 1. There is no reason to suggest that there would be a 'significant negative effect' under Option 2, given that policies would be in place to guide development, but it is fair to highlight a degree of concern. This is because Chobham is notably sensitive in the local context (Surrey Heath and also looking a considerable way further afield), with a high density of listed buildings, complete with a Grade 1 listed parish church. Another potentially relevant SA topic is 'biodiversity', given the inherent sensitivity of Chobham's position in the landscape, closely associated with Chobham Common. However, there is very little if any priority habitat located within the proposed settlement / Green Belt boundary, hence Option 2 is not judged to give rise to any notable concern over-and-above Option 1. In <b>conclusion</b> , Option 2 is clearly a positive step in respect of housing delivery, which is an important consideration given that Surrey Heath is 'exporting' unmet housing need to Hart District, and also given that there may be some locally arising housing needs at Chobham. Option 2 gives rise to a modest tension with historic environment objectives only.
Air / env quality	=	=	
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	=	=	
Communities and health	=	=	
Economy and employment	=	=	
Heritage	★1	2	
Housing	2	★1	
Landscape	=	=	
Land, soils and resources	=	=	
Transport	=	=	
Water	=	=	

### Selecting the preferred option

The following text is provided by SHBC officers:

**Option 2** is the preferred option. The NPPF sets out that Green Belt should not be used to afford protection to a settlement unless warranted from a Green Belt perspective. Chobham has an attractive and valued historic core, but this is not sufficient reason in itself to warrant the retention of the Green Belt designation in this location. Local Plan policies as drafted are considered sufficiently robust in order to ensure that development coming forward across the plan period within Chobham is suitable from a character perspective, however there is an opportunity to develop an up to date Conservation Area Character Appraisal and Management Proposals document to further ensure that future development within the settlement is appropriate.

# Appendix V: Green Belt Review maps

As discussed in Section 5.2, a Green Belt Review has been undertaken in a series of stages, with the most recent stage of work involving preparation of the Green Belt Review Addendum (2023).

The three figures below show summary findings of the Green Belt review, specifically:

- The level of function of parcels (three maps)
- The level of risk that would arise to the wider Green Belt if parcels were to be released.

Figure A: Level of function map 1: Bagshot, Lightwater and Windlesham

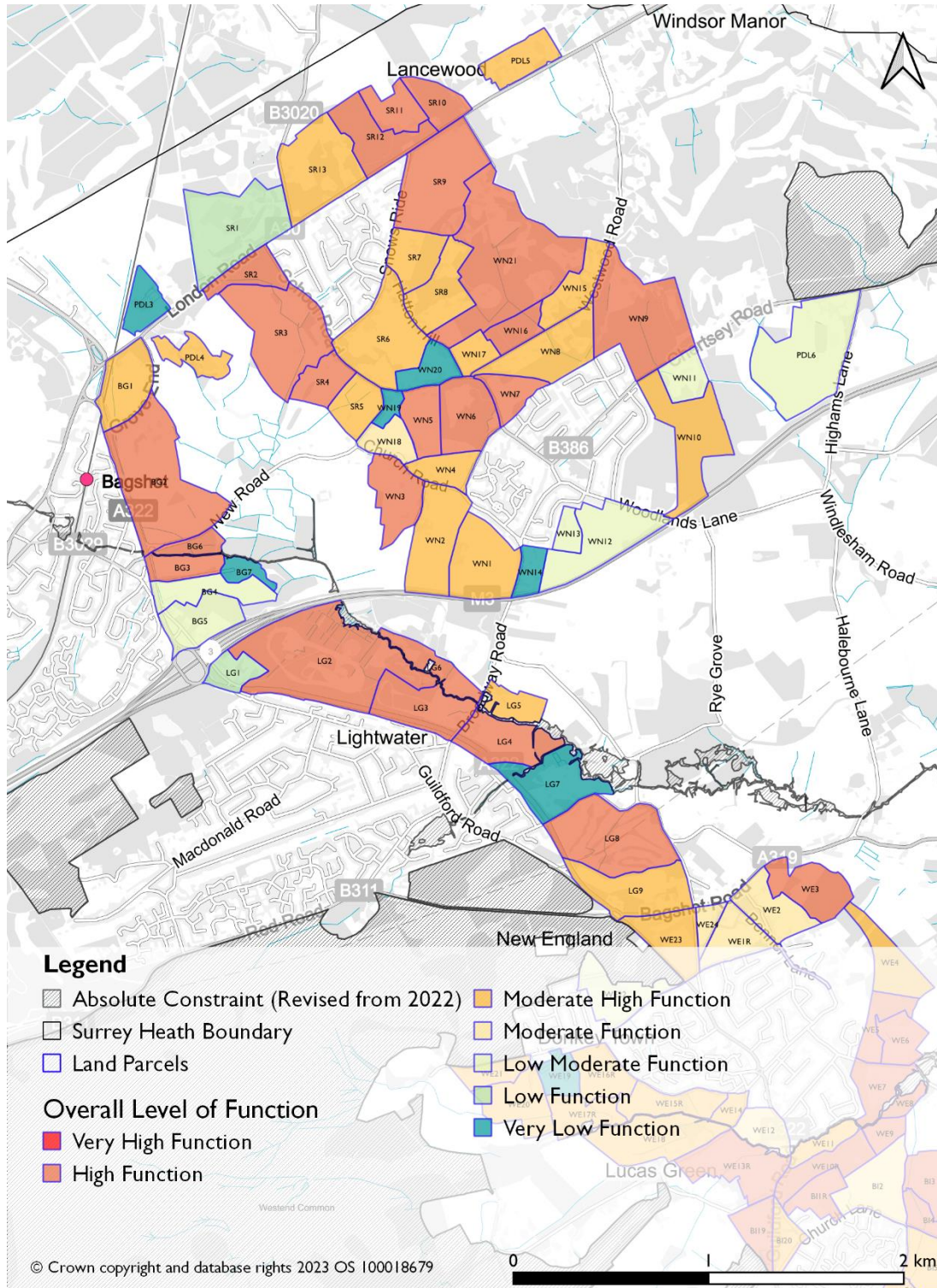


Figure B: Level of function map 2: West End and Bisley

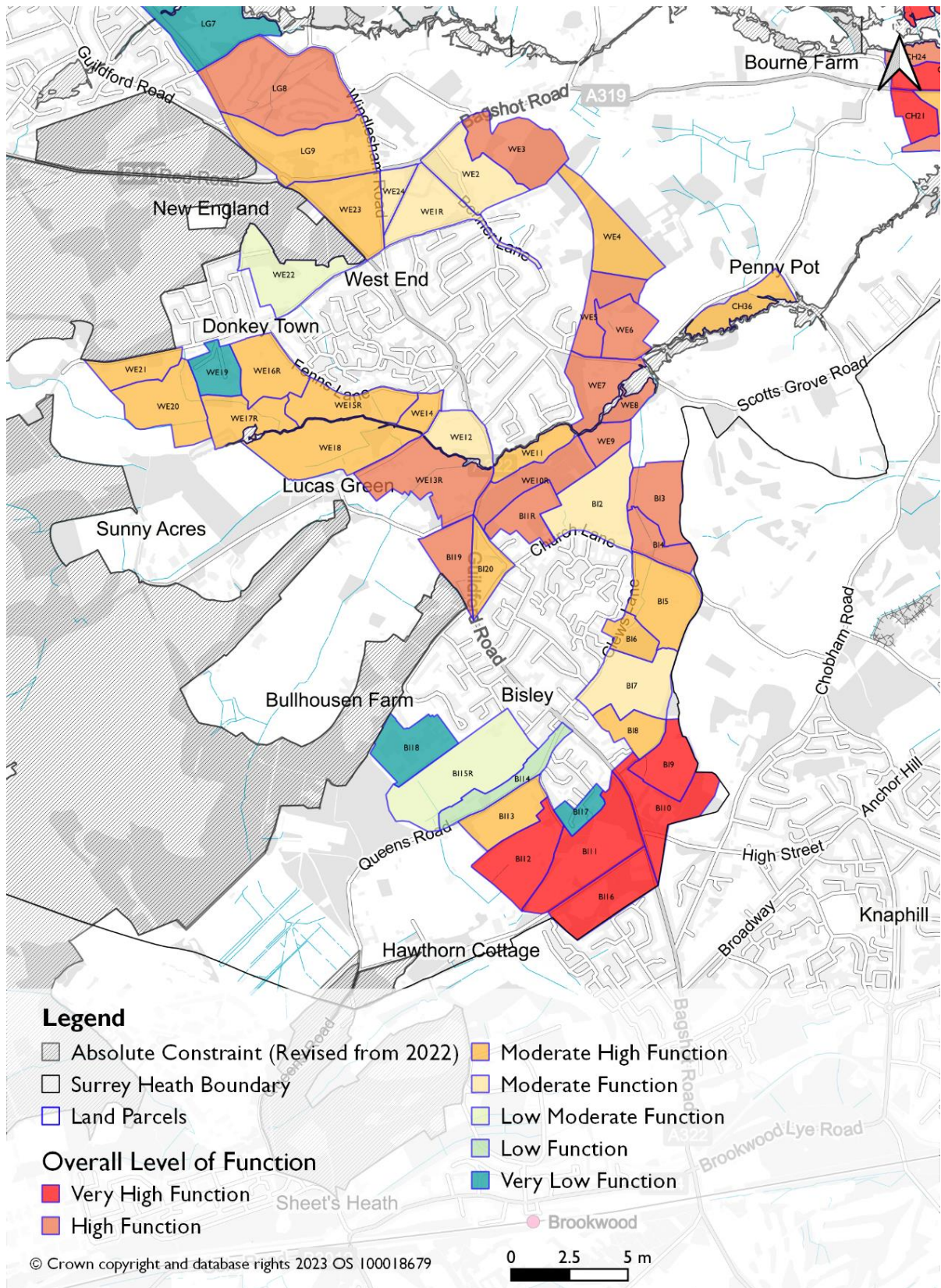


Figure C: Level of function map 3: Chobham

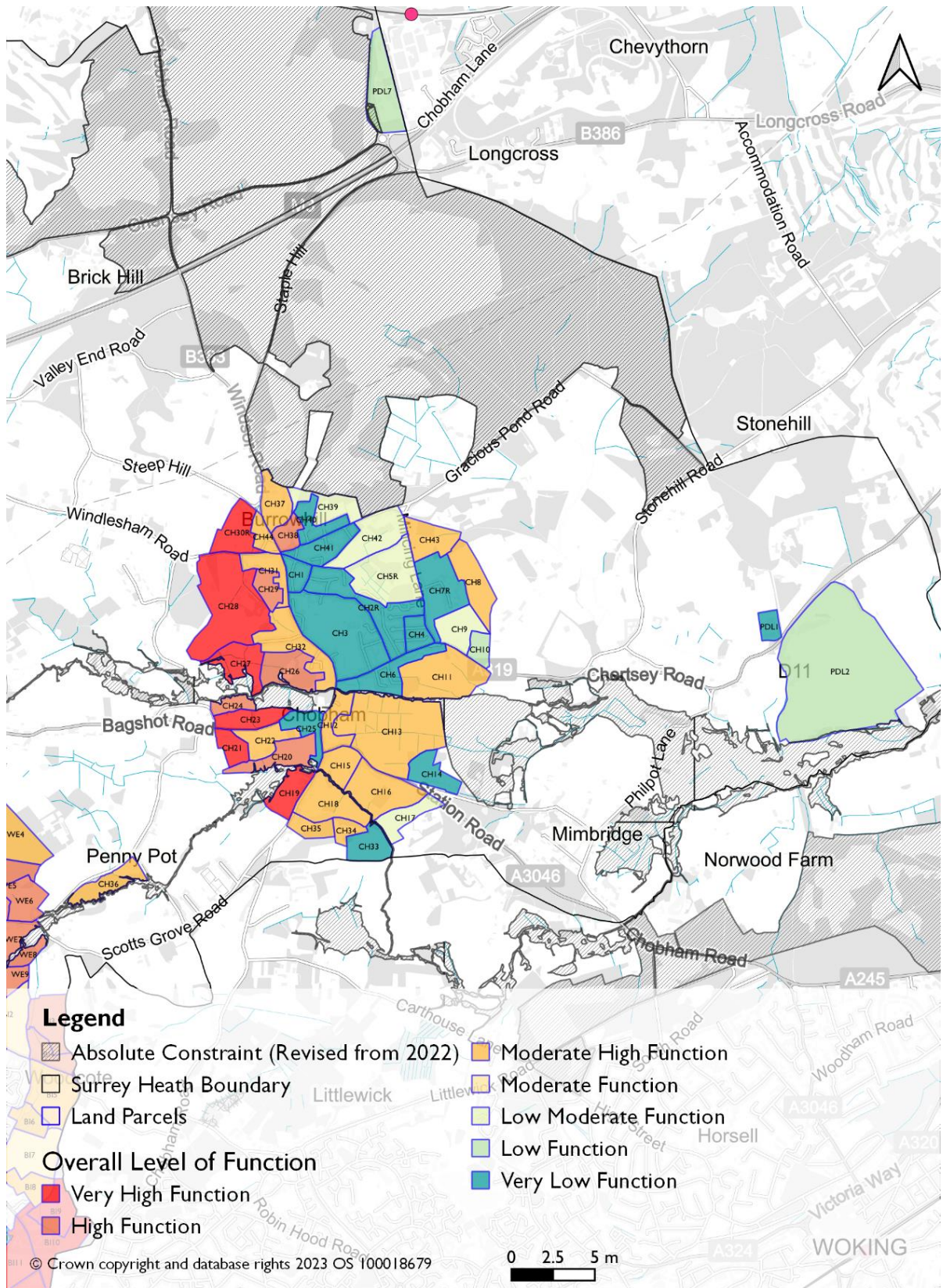
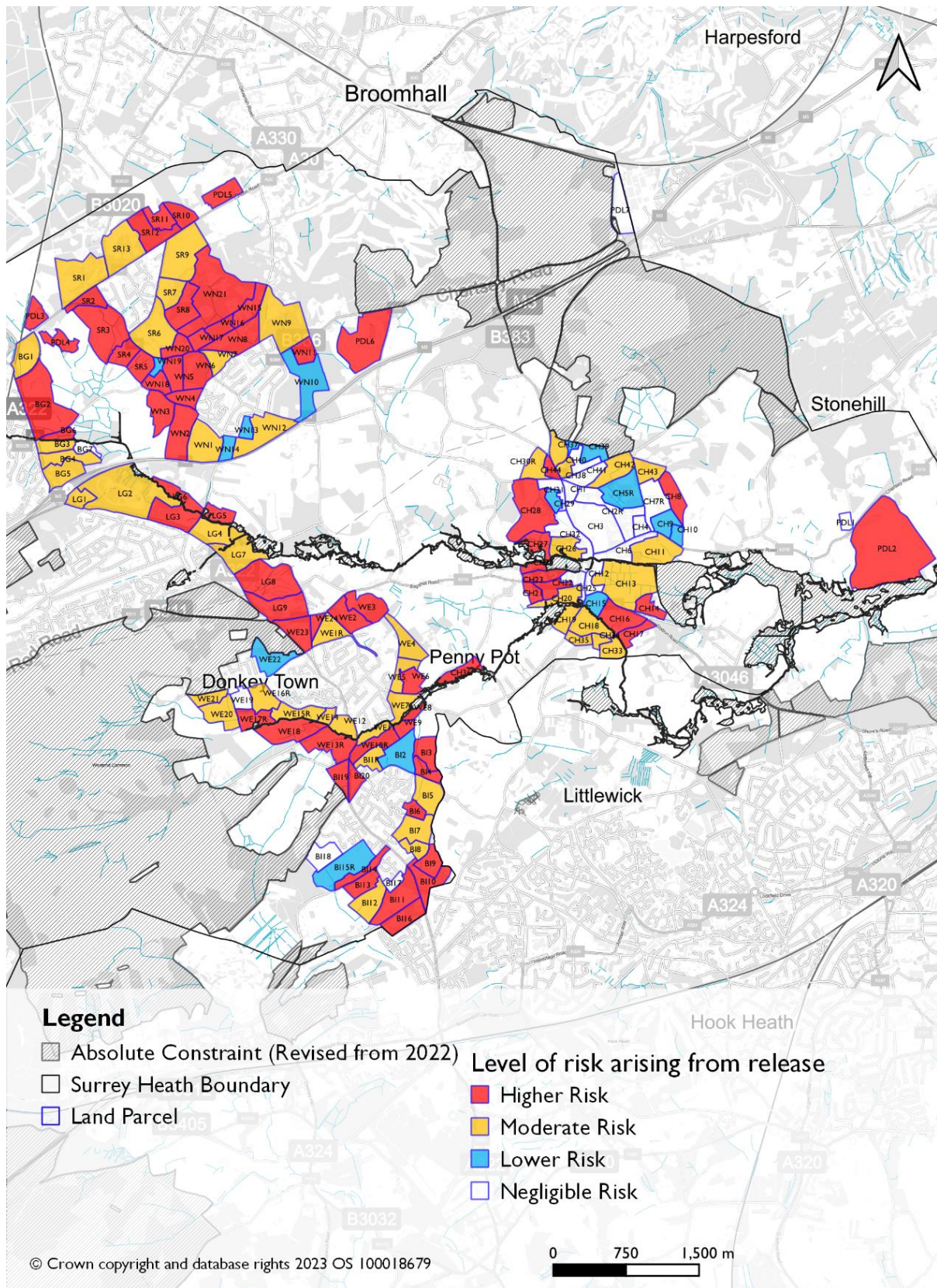




Figure D: The level of risk that would arise to the wider Green Belt if parcels were to be released



# Appendix VI: Site options GIS analysis

## Introduction

As discussed in Section 5.3, as a relatively minor step in the process of arriving at reasonable growth scenarios (see Figure 5.1) all site options were subjected to GIS analysis in 2021. The outcome of the analysis is in the form of a large spreadsheet of data, with over 100 rows – one for each site option – and around 50 columns, where each column presents performance data (e.g. percentage intersect with a flood zone), supplementary data (e.g. the name of the nearest school) or other attribute information (e.g. the proposed use, or uses, for the site in question).

The aim of this section is to present summary insights, considering the data both:

- within each column of the spreadsheet – i.e. information on the spread of data for each performance measure, including site options that stand-out as performing notably well and notably poorly; and
- across each row of the spreadsheet – i.e. considering how each site option performs, in respect of various locational metrics, both in absolute terms and relative to other site options.

### When was this work undertaken?

GIS analysis of site options was run in 2021 ahead of the Draft Plan / Interim SA Report consultation in early 2022. The decision was taken not to re-run the analysis in 2023/24, with a view to ensuring proportionate analysis, and recognising the very limited role that GIS analysis plays in the overall process reported in Section 5 of this report.

The drawback to this approach is that the analysis does not include several new site options that have emerged since 2021/22, and also does not account for several amendments to site boundaries. However, this is not considered to be a significant drawback, and efforts are made below to mitigate any concerns (see the table below).

There are two other theoretical drawbacks that are not thought to apply in practice. Firstly, there are not known to be any new or updated key datasets (e.g. showing the location of constraints, or community infrastructure) that need to feed into the analysis. Secondly, the wider methodological approach taken in 2021, including the approach taken to communicating / differentiating the performance of site options against criteria, is considered to be robust.

### Inherent limitations of GIS analysis

GIS analysis of the spatial relationship between site options and various constraint/push (e.g. historic environment designations) and opportunity/pull (e.g. schools) features cannot be considered sophisticated analysis, in that:

- it will rarely serve to highlight an issue or an opportunity associated with any given site option that would not otherwise be readily apparent; and
- many of the issues and opportunities that the analysis does highlight are only 'theoretical', in that they can be discounted, or assigned limited weight in decision-making, upon closer inspection, including after taking into account what the development would involve in practice. For example, where a site is distant from accessible greenspace this can sometimes be addressed by delivery of new accessible greenspace onsite.

As such, GIS analysis of site options should not be overly relied upon, at the expense of a focus on qualitative analysis informed by wide ranging evidence, including the views of stakeholders, and professional judgement.

The analysis should certainly not be used as a primary means for arriving at overall conclusions on site options. Any attempt to utilise the analysis in this way would necessitate a process of Multi Criteria Analysis (MCA) whereby a degree of importance is assigned to each of the performance metrics, and this process is fraught with challenges.

### Structure of this appendix

Set out below is:

- further discussion of methodology;
- insights into the data for a series of key metrics in turn; and then
- insights into the data for each of the site options in turn.

## Methodology

The **first step** was to gather GIS data. With regards to data for site options, the Council holds collated data of all sites submitted for consideration as part of the local plan-making process (including by the Council itself). One of the issues/limitations is that land-owners sometimes submit multiple overlapping sites over time, leading to uncertainty regarding whether certain site options have become superseded. Another challenge is that large land-holdings sometimes get submitted, within which might be contained realistic site options.

With regards to data for constraint/push and opportunity/pull features, considerations include:

- Much data is available nationally, including data for air quality management areas, national biodiversity and historic environment designations and the nationally defined flood risk zones.
- There is no regional or sub-regional data repository (e.g. as there is for [London](#)).
- Much data is held by the Council, including as shown at: <https://www.surreyheath.gov.uk/about-council/about-surrey-heath/maps>. There is a need to focus on data that is held for the borough as a whole.

The **second step** was then to run the analysis, i.e. query the spatial relationship between each site option and each push/pull feature. This involved using a GIS tool developed by AECOM, and there are two points to note:

- Distance was measured “as the crow flies” (it can also be possible to calculate distance by road, footpath etc).
- Distance was calculated from the nearest point of each site option (there can also be arguments to calculate distance from the centre point, or from known or likely access points).

Having generated the spreadsheet, the **third step** was then to interrogate and report the data – see below.

## Analysis outcomes by metric

The aim here is to present concise insights into trends across the data for a range of key metrics.

N.B. the analysis below is slightly out-of-date on account of the GIS analysis dating from 2021 (as discussed). For example, the analysis refers to permitted sites, but this is permitted sites as of 2021.

### Air quality

#### Air quality management area (AQMA)

Just one site intersects an AQMA, namely Site 904 (Land at Kings International College, Watchetts Drive, Camberley), which is discounted. This site stands out as **performing poorly**. The next closest site is 272m.

17 sites are beyond 4km from an AQMA, at which distance it is fair to say that proximity to an AQMA is likely to be a ‘non-issue’. These sites stand-out as **performing well**.

The table below summarises the performance of the various categories of SLAA site, serving to suggest that distance to an AQMA was not a major factor influencing the process.

#### Average distance to an AQMA

Category of site	Distance (m)
Permitted	2,741
Deliverable/developable	2,159
Discounted but shortlisted in 2021/2022 <sup>40</sup>	3,208
Discounted	2,554

#### Strategic Road Network (SRN)

In addition to proximity to an AQMA, it is appropriate to consider proximity to the SRN, as major roads can be a source of both air and noise pollution.

<sup>40</sup> i.e. the 13 discounted Green Belt small/modest-sized urban extension options explored under ‘Growth Scenario 2’ in 2022.

13 sites are within 50m, and so are judged to stand out as **performing poorly**. Of these sites, four are deliverable or developable (closest being 8m) and two are discounted SLAA sites that were shortlisted in 2021/22,<sup>40</sup> with the remaining six being discounted SLAA sites.

77 sites are beyond 500m, at which distance it is fair to say that proximity to the strategic road network is likely to be a 'non-issue'. These sites stand-out as **performing well**.

### Biodiversity

There is good availability of data to show areas of varying biodiversity value/sensitivity and, in turn, good potential to highlight site options that potentially give rise to a degree of concern due to intersect (which can suggest a risk of habitat loss) or proximity (e.g. woodlands in proximity to new homes can be at risk of recreational impacts).

The key consideration here is the Thames Basin Heaths Special Protect Area (SPA), designated under the European Birds Directive, which is an internationally important complex of linked sites constraining large parts of the borough, as well as neighbouring boroughs. There are four main components of the SPA in the borough, of which three are also designated as a Special Area of Conservation (SAC), under the European Habitats Directive.

#### Special Protection Area (SPA)

16 sites are within 400m, which is a well-established 'buffer zone' surrounding the SPA, within which housing growth is not suitable. These sites stand out as **performing poorly**.

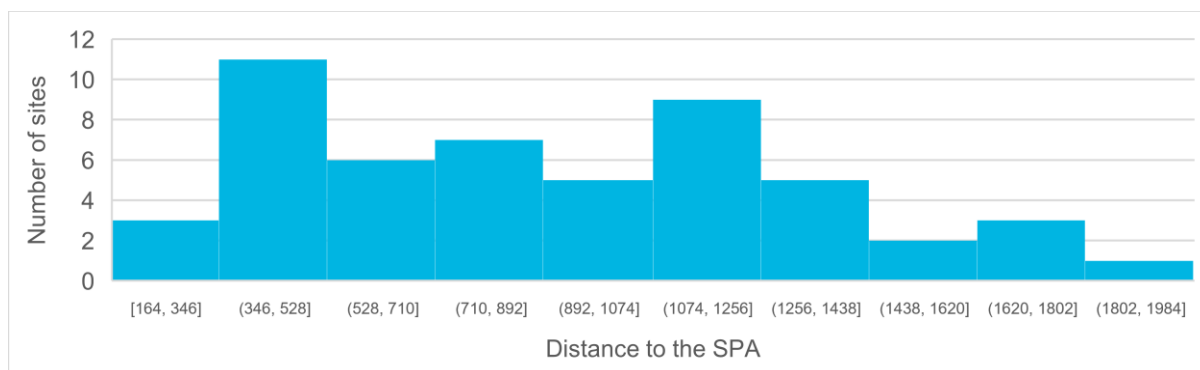
Beyond 400m there are well-established mechanisms in place to ensure that impacts on the SPA are avoided or suitably mitigated, including by ensuring sufficient Suitable Alternative Natural Greenspace (SANG) to avoid worsened recreational pressure on the SPA. Specifically, there is a requirement to provide SANG alongside new housing within 5km of the SPA, with all of Surrey Heath falling within this zone.

However, there is nonetheless a need to avoid reliance on mitigation measures where possible, i.e. there is a preference for avoiding issues/impacts in the first place (the mitigation hierarchy). For example, Natural England define a series of Risk Impact Zones surrounding all SPA components, to guide work at the planning application stage (as opposed to local plan-making) which extend well beyond 400m.

On this basis, it is appropriate to differentiate the remaining 100 sites, which are beyond 400m from the SPA, on a light red / amber / yellow / light green colour scale – see the large table at the end of this section. The 'least constrained' site option is 2.5km distant from the SPA.

The histogram below serves to suggest that, outside of the 400m buffer zone, distance to the SPA was not a major factor influencing the SLAA.

*Distance of non-permitted deliverable / developable SLAA sites to the SPA*



#### Site of Special Scientific Interest (SSSI)

All of the land designated as SPA is also nationally designated as SSSI. Additionally, the Basingstoke Canal, at the south west extent of the borough, is designated as a SSSI.

It is difficult to know how best to categorise the performance of site options in respect of distance to a SSSI. On balance, it is considered appropriate to highlight the 12 sites within 50m of a SSSI as **performing poorly**, which includes four (housing) sites in proximity to the Basingstoke Canal SSSI, which includes two sites identified as deliverable or developable by the SLAA, and one site discounted by the SLAA but shortlisted in 2021/22.<sup>40</sup>

36 sites are beyond 1km from a SSSI, such that they stand-out as **performing well**. Of course, for the great majority of these sites (all bar five) the nearest SSSI is also designated as SPA, hence the sites are constrained in SPA terms, but it is fair to highlight these sites as performing well on the basis of being relatively distant.

#### Site of Nature Conservation Importance (SNCI)

Three sites intersect an SNCI, of which one is permitted (Princess Royal Barracks), one is identified as deliverable or developable by the SLAA (although only 3% of the site intersects) and another is discounted. A further nine sites are then adjacent or near adjacent (10m) to an SNCI, of which two are identified as deliverable or developable by the SLAA and the others are discounted. These sites stand-out as **performing poorly**.

37 sites are beyond 400m from an SNCI, such that they stand-out as **performing well**, e.g. on the basis that 400m is a well-established easy walking distance (and given that recreational pressure is often a key issue).

#### Ancient woodland

There is relatively little ancient woodland within the borough, but there are several notable patches that are not nationally designated (SSSI) or locally designated (SNCI).

One site intersects ancient woodland (Fairoaks) and another is 24m distant (discounted by the SLAA but shortlisted in 2021/22).<sup>40</sup> These site stand-out as **performing poorly**.

105 sites are beyond 200m from an ancient woodland, such that they stand-out as **performing well**.

#### Priority habitat

22 sites significantly intersect priority habitat (>20%) and are judged to stand-out as **performing poorly**. Of these sites, one site is permitted, six are identified as deliverable by the SLAA and a further five are discounted by the SLAA but shortlisted in 2021/22.

74 sites do not intersect priority habitat, such that they stand-out as **performing well**.

The table below serves to suggest that intersect with priority habitat was a factor influencing the SLAA.

#### Tree Preservation Orders

N.B it is recognised that this is not strictly a biodiversity designation, but it warrants consideration, nonetheless.

15 sites significantly (>20%) intersect land with TPO designation and are judged to stand-out as **performing poorly**. Focusing on the ten sites with more than 50% coverage, it is notable that one site is permitted and a further four are identified as developable by the SLAA.

96 sites do not intersect a TPO, such that they stand-out as **performing well**.

#### Summary of average distance / intersect with biodiversity designations

	Avg distance to biodiversity designations (m)			Avg % intersect with biodiversity designations	
	SPA	SSSI	SNCI	Priority habitat	TPO
Permitted	637	615	260	7.4	20
Deliverable/developable	992	826	318	9.6	7.6
Discounted but shortlisted in Section 5.4	748	702	315	21.2	8.5
Discounted	926	874	311	21	11.1

#### Historic environment

There is good availability of data for designated assets/areas, and so sites in proximity can be flagged as potentially constrained. However, it is important to recognise that proximity is a very crude indicator of historic environment impact risk. For example, there is a need to take account of topography, recognising that assets such as churches and stately homes are often located on raised land. There is also a need to consider impacts aside from direct impacts to setting, notably impacts associated with increased traffic through historic centres and along historic lanes. For these reasons, GIS analysis of site options is only a relatively minor input to the SA process (specifically the process of defining reasonable growth scenarios for appraisal in Section 5 of this report), as discussed.

### Conservation area

30 sites are within 200m and are judged to stand-out as **performing poorly**. Of these sites nine either intersect or are adjacent (within 10m), of which six are identified as deliverable or developable by the SLAA.

16 sites are more than 2km distant, and so stand-out as **performing well**.

### Listed building

It has only been possible to measure distance to 'a listed building', as opposed to measuring distance to each of the three categories of listed building in turn. At the next stage it will be possible to rectify this.

7 sites are within 20m of a listed building and are judged to stand-out as **performing poorly**.

57 sites are more than 200m distant, and so stand-out as **performing well**.

### Registered park or garden (RPG)

Two sites are within 50m of an RPG and are judged to stand-out as **performing poorly**. Specifically, both sites are within 20m of Bagshot Park, which is grade 2 listed, and both sites are identified as developable by the SLAA.

Eight further sites are within 400m, and so are flagged as **relatively poorly**.

### Scheduled monument

No sites are in proximity to a scheduled monument, with the closest site 392m distant (discounted by the SLAA).

### Locally listed buildings

Four sites intersect a locally listed building and are judged to stand-out as **performing poorly**. Three of these sites are identified as developable by the SLAA.

20 further sites are adjacent or within 20m, and so are flagged as performing **relatively poorly**.

### Archaeology area

Six sites intersect or are adjacent and so are flagged as performing **relatively poorly**.

## Flood risk

Ten sites are identified as **performing poorly** on the basis of intersecting flood zone 3 by more than 20% or flood zone 2 by more than 50%. Of these sites, four are identified as developable by the SLAA.

A further 11 sites intersect the flood zone and so are flagged as performing **relatively poorly**.

## Communities

There are a range of relevant GIS datasets; however, there is no available dataset showing the location of GP surgeries. Efforts will be made to gather further data to inform future plan-making and SA.

### Town centre

19 sites are either within Camberley town centre (four sites) or within 800m such that they stand-out as **performing well**. A further ten sites are then within 2km, and so are judged to perform **relatively well**.

### District or local centre, or neighbourhood parade

40 sites are within 400m such that they stand-out as **performing well**.

19 sites are more than 1km and are judged to stand-out as **performing poorly**. However, it is important to note that several of these sites perform well in respect of proximity to Camberley town centre.

### School

It has only been possible to measure distance to 'a school', as opposed to measuring distance to various categories of school (for example, and notably, secondary versus primary). At the next stage it will be possible to rectify this.

30 sites are within 400m such that they stand-out as **performing well**.

6 sites are more than 1.5km and are judged to stand-out as **performing poorly**.

### Train station

28 sites are within 400m such that they stand-out as **performing well**.

The remaining 80 sites are placed on a light red / amber / yellow / light green colour scale according to distance – see the large table at the end of this section. Nine sites are beyond 4km from a train station, with the worst performing site 4.5km distant.

### Bus stop

There is a need to treat the available dataset showing the location of bus stops with caution, because the level of service can vary greatly and change over time (indeed, it is not uncommon for services to cease entirely).

Three sites are more than 800m and are judged to stand-out as **performing poorly**.

A further 18 sites are beyond 400m and judged to perform **relatively poorly**.

### Greenspace

40 sites are within 100m, but do not intersect, such that they stand-out as **performing well**.

69 sites intersect, and so must be flagged as potentially **performing poorly**, and 16 other sites perform poorly on the basis of being located beyond 400m.

### Nature reserve

20 sites are within 800m of a National Nature Reserve (Chobham Common; 8 sites) of a Local Nature Reserve (12 sites) and are flagged as **performing well** in that these sites are managed for access, albeit it is recognised that NNRs are also highly sensitive in biodiversity terms (Chobham Common is designated SPA and SAC).

### Index of Multiple Deprivation (IMD)

All Super Output Areas (SOAs) nationally are assigned an Index of Multiple Deprivation (IMD) score, and the results can be viewed at: [dclgapps.communities.gov.uk/imd/iod\\_index.html](https://dclgapps.communities.gov.uk/imd/iod_index.html).

16 sites intersect a Super Output Area (SOA) that is associated with a degree of relative deprivation, specifically not within the top 20% of least deprived SOAs nationally. These sites are flagged as **performing well** in that there could be an opportunity for development to support regeneration.

### Green Belt

40 sites intersect the Green Belt and so are flagged as performing **relatively poorly**.

## Analysis outcomes by site option

The table below includes a row for each of the site options subjected to analysis. The aim is to provide an insight as to the performance of each site in respect of the metrics discussed above, both in absolute and relative terms.

### Structure of the table

Sites are firstly grouped by **sub-area**.

Secondly, within each sub-area, sites are sorted according to their 'SA status' as follows:

- **Deliverable or developable** SLAA sites (with sites >10 homes and so allocated highlighted).
- Discounted SLAA sites progressed to the reasonable growth scenarios (i.e. **'shortlisted'**), with a distinction between A) those that were progressed in 2021/22 and B) the one site that is now progressed (Fairoaks).
- **Discounted** SLAA sites

With regards to the columns on the right-hand side of the table:

- Sites that stand out as performing well / poorly are assigned a **green or red** in line with the methodology set out in the section above.
- Sites that do not stand-out as performing well / poorly are either assigned a colour on a light-red to light-green **colour scale** (using the 'conditional formatting' function in MS Excel) or assigned **no colour**.

Finally, with to reiterate the analysis below is **somewhat out of date**. Specifically the GIS analysis itself dates from 2021, and so a small number of new sites have not been subjected to the analysis (these sites have blank cells in the right hand columns of the table). However, the information in the left hand columns in the table is up-to-date, specifically the information relating to the status of sites and the proposed capacity of sites.

Site options GIS analysis

Ref	Name	Status	Area (ha)	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt	
<b>Bagshot</b>																												
247	Bagshot Highway Depot, London Road	Developable	1.0	50	Green	Red	Red	Green	Green	Orange	Green	Green	Red	Green	Red	Red		Green		Green	Orange	Green	Yellow		Green			
408	Land rear of 192-210 London Road	Developable	1.3	20	Yellow	Green	Red	Orange	Red	Green	Red	Green	Orange	Red				Green		Red	Green	Green			Green			
317	The Deans, Bridge Road	Developable	0.2	20	Green	Green	Red	Green	Green	Green	Green	Green	Red	Orange	Yellow	Yellow	Yellow	Red		Green	Green	Green			Orange	Green		
320	Tanners Yard, London Road	Developable	0.3	9	Green	Green	Red	Orange	Yellow	Green	Green	Green	Red	Orange	Red			Yellow		Green	Green	Green			Green	Green		
407	Highways Farm, 226 London Road	Deliverable	0.4	8	Yellow	Green	Red	Orange	Red	Green	Green	Green	Orange	Green				Green		Red	Yellow	Green			Green			
901	212 London Road	Developable	0.4	5	Yellow	Green	Red	Orange	Orange	Green	Green	Green	Orange	Red				Green		Red	Yellow	Green			Green			
736	Grove End	Shortlisted 2022	4.3	-	Green	Red	Red	Green	Green	Green	Green	Green	Red	Green	Yellow			Green		Yellow	Yellow	Green	Yellow		Green		Yellow	
446	Land at Notcutts, London Rd & west of Hawkesworth Dr	Discounted	7.4	-	Yellow	Green	Red	Orange	Red	Green	Green	Green	Orange	Orange				Green		Yellow	Green	Green			Red			
798	Land at Pennyhill, London Road	Discounted	7.3	-	Yellow	Green	Red	Orange	Green	Green	Red	Red	Orange	Orange	Yellow			Green		Yellow	Green	Green			Red			
<b>Bisley</b>																												
573	317-319 Guildford Road	Developable	0.3	17	Orange	Red	Red	Green	Orange	Green	Green	Green	Green	Orange				Green		Orange	Green	Green			Green			
763	Land at Elder Road	Developable	0.2	5	Orange	Green	Red	Orange	Green	Green	Green	Green	Green	Yellow				Green		Green	Green	Yellow			Green	Green		
740	Land East of Clews Lane	Shortlisted 2022	8.2		Orange	Red	Red	Green	Green	Red	Green	Green	Green	Orange				Green		Green	Green	Green			Green	Green		Yellow



Ref	Name	Status	Area (ha)	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt
800	The Miles Green Nursery	Shortlisted 2022	4.7		Orange	Yellow	Red	Yellow	Orange	Green	Light Green	Green	Green	Green				Green		Yellow	Light Green	Light Green		Green	Green		Yellow
902	Former Bisley FC	Shortlisted 2022	3.8	-	Orange	Red	Red	Orange	Red	Green	Light Green	Green	Green	Red			Yellow	Green		Green	Light Green	Light Green		Green	Red		Yellow
903	Land South of Church Lane	Shortlisted 2022	1.8	-	Orange	Green	Red	Light Green	Green	Green	Green	Green	Green	Green				Green		Yellow	Light Green	Light Green	Yellow	Green	Green		Yellow
741	Land West of Guildford Road	Discounted	13	-	Orange	Red	Red	Red	Red	Green	Green	Green	Green	Green				Green		Green	Green	Light Green		Green	Green		Yellow
236	Land rear of 309-315 Guildford Road	Discounted	0.2	-	Orange	Red	Red	Light Green	Orange	Green	Green	Green	Green	Green	Yellow			Green		Yellow	Green	Light Green		Green	Light Green		
<b>Camberley</b>																											
814	London Road Block	Developable	2.6	524	Orange	Green	Orange	Light Green	Orange	Green	Green	Green	Red	Red		Yellow		Green	Green	Red	Orange	Green			Light Green		
27	Land east of Knoll Road <sup>41</sup>	Developable	1.3	340	Orange	Green	Orange	Light Green	Green	Green	Red	Light Green	Red	Orange				Green	Green	Red	Light Green	Green			Green	Light Green	
25	Camberley Station, Pembroke Broadway	Developable	0.4	150	Orange	Green	Orange	Green	Green	Green	Green	Green	Red	Green				Green	Green	Red	Orange	Green			Light Green		
1015	Former Portesbury School, Portesbury Rd	Developable	1.1	36	A new site since 2021 and so not analysed (but part of site 27, as analysed in 2021)																						
240	Camberley Centre, France Hill Drive	Developable	0.9	35	Orange	Green	Orange	Green	Green	Green	Green	Green	Red	Green		Red		Green	Green	Light Green	Orange	Green			Green		
21	61-63 London Road	Developable	0.3	32	Orange	Green	Red	Yellow	Light Green	Green	Green	Red	Red	Green		Yellow		Green	Green	Light Green	Light Green	Light Green				Orange	
801	Pinehurst, 141	Deliverable	0.8	32*	Orange	Green	Yellow	Green	Green	Green	Green	Green	Red	Red				Green	Green	Red	Orange	Green			Orange		
1005	St James House, Knoll Road	Developable	0.2	30	Orange	Green	Orange	Green	Green	Green	Green	Green	Red	Green				Green	Green	Red	Orange	Green			Green		

<sup>41</sup> The boundary of this site has been significantly amended since it was analysed in 2021, specifically Former Portesbury School (Site 1015) has been separated out to form its own site.

Ref	Name	Status	Area (ha)	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt		
833	York Town Car Park	Developable	0.5	27	Orange	Green	Orange	Light Green	Orange	Green	Green	Green	Red	Orange				Green	Green	Green	Orange	Light Green			Orange	Light Green			
314	280 Gordon Avenue	Developable	0.2	15	Orange	Green	Light Green	Green	Green	Green	Green	Green	Orange	Green				Green	Green	Green	Light Green	Light Green			Light Green	Light Green			
295	439-445 London Road	Developable	0.1	15	Yellow	Green	Orange	Light Green	Orange	Green	Green	Green	Red	Orange		Yellow		Yellow	Light Green	Green	Orange	Green			Light Green	Light Green			
424	Land rear of 1-47 Sullivan Road	Developable	0.2	14	Orange	Green	Orange	Green	Yellow	Green	Green	Green	Red	Green				Green	Green	Green	Orange	Light Green			Orange	Light Green			
717	Burwood House Hotel, 15 London Road	Developable	0.2	10	Orange	Green	Orange	Light Green	Green	Green	Green	Red	Yellow	Light Green				Green	Light Green	Green	Green	Light Green			Green				
1007	139 Frimley Road	Developable	9.1	9	A new site since 2021 and so not analysed																								
49	Peerless site North, Sullivan Road	Developable	0.6	8	Orange	Green	Orange	Light Green	Orange	Green	Green	Green	Red	Light Green				Green	Green	Green	Orange	Light Green			Orange	Light Green			
877	26 Portsmouth Road	Developable	0.2	8	Red	Green	Orange	Green	Green	Green	Green	Light Green	Yellow	Green				Green	Light Green	Orange	Light Green	Light Green			Red				
1008	Sparks Garage, 2 London Road	Developable	0.1	8	A new site since 2021 and so not analysed																								
1009	145-147 Frimley Road	Developable	0.1	8	A new site since 2021 and so not analysed																								
1006	Orana Lodge Knightsbridge Road	Developable	0.2	7	A new site since 2021 and so not analysed																								
721	Central House, 75-79 Park Street	Developable	0.0	6	Orange	Green	Orange	Green	Light Green	Green	Green	Green	Red	Green				Green	Green	Orange	Red	Green			Yellow				
1014	Land south of Bridge Road	Deliverable	0.1	5	Orange	Green	Light Green	Green	Green	Green	Green	Green	Yellow	Green				Green	Light Green	Green	Light Green	Light Green			Light Green				

Ref	Name	Status	Area (ha)	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt
921	Land East of Park Street, North of Princess Way <sup>42</sup>	Developable	0.4	-	Orange	Green	Orange	Green	Yellow	Green	Green	Green	Red	Green				Green	Green	Orange	Red	Green			Yellow		
904	Land at Kings International College, Watchetts Drive	Discounted	12	-	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow			Yellow	Green	Green	Green	Green			Red	Green	
37	Tekels Park <sup>43</sup>	Discounted	4.5	-	Red	Green	Yellow	Green	Red	Green	Red	Red	Red	Green		Yellow		Green	Green	Red	Yellow	Green	Yellow		Red		
878	Building B, Riverside Way	Discounted	0.8	-	Orange	Yellow	Orange	Green	Green	Green	Green	Green	Green	Green				Red	Green	Green	Green	Green	Yellow		Green		
802	Four winds, 29 London Road, Camberley	Discounted	0.6	-	Orange	Green	Orange	Green	Green	Green	Red	Red	Red	Orange	Orange				Green	Green	Green	Green	Green		Yellow		
804	Land East of Frimley Road, South of London Road	Discounted	0.3	-	Yellow	Green	Orange	Green	Red	Green	Green	Green	Red	Orange				Green	Green	Green	Red	Green		Orange	Green		
500	Church of St Peter, Caesars Camp Road	Discounted	0.3	-	Orange	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green				Green	Green	Green	Green	Green		Red	Green	
250	65-85 High Street	Discounted	0.3	-	Orange	Green	Orange	Green	Green	Green	Green	Green	Red	Green				Green	Green	Red	Orange	Green			Green		
6	22 Crawley Hill	Discounted	0.3	-	Red	Green	Yellow	Green	Green	Green	Green	Green	Red	Green		Red		Green	Green	Red	Green	Green			Yellow		
246	Old Dean Youth Centre, Kingston Road	Discounted	0.2	-	Orange	Green	Red	Orange	Green	Green	Green	Green	Green	Green				Green	Green	Green	Green	Green			Green	Green	
1002	31 High Street	Discounted	0.0	-	Orange	Green	Orange	Green	Green	Green	Green	Green	Red	Green				Green	Green	Red	Orange	Green			Green		
<b>Chobham</b>																											
447	Chobham Rugby Club, Windsor Road	Developable	3.5	91	Green	Green	Red	Yellow	Orange	Green	Green	Green	Red	Red		Yellow		Green		Green	Green	Orange		Green	Red	Green	Yellow

<sup>42</sup> Now no longer expected to deliver any homes, but this remains an option to be considered through the development management process.

<sup>43</sup> A much smaller version of this site has been submitted, but its capacity is / would be below 5 homes and so it is discounted from the SLAA on this basis.

Ref	Name	Status	Area (ha)	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt
548	Broadford, Castle Grove Road	Developable + Shortlisted 2022	2.2	15																							
890	Fairoaks	Shortlisted	153	-																							
238	Mincing Lane Nursery, Mincing Lane	Shortlisted 2022	1.6	-																							
546	Land rear of The Grange	Shortlisted 2022	1.5	-																							
597	Land northwest of The Grange	Shortlisted 2022	1.5	-																							
918	9 The Avenue	Shortlisted 2022	0.7	-																							
916	7 The Avenue	Shortlisted 2022	0.2	-																							
543	Round Pond Nurseries, Windsor Road	Discounted	8.3	-																							
751	3 Chobham Lane	Discounted	7.6	-																							
414	Land north of Lakeside Drive	Discounted	3.5	-																							
510	Land at Flexlands Farm, Station Road	Discounted	2.3	-																							
917	Land Between 46 - 62 Mincing Lane	Discounted	1.8	-																							
843	Former Plants to Go, Bagshot Road	Discounted	1.6	-																							
409	Land at Latchetts Mead, Green Lane	Discounted	1.0	-																							

Ref	Name	Status	Area (ha)	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt
919	Riverside Nursery, Philpot Lane	Discounted	0.9	-																							
835	Land East of Lovelands Lane	Discounted	0.4	-																							
<b>Deepcut</b>																											
887	Land at Loen, St Catherines Road	Deliverable	4.4	60																							
757	Land north of Guildford Road	Developable	5.5	21																							
920	The Grange, St Catherines Road	Developable	2.9	17																							
846	Former Premier Site	Developable	0.4	13																							
503	Land to the East of Bellow Road	Developable	1.3	5	A new site since 2021 and so not analysed																						
922	Ballydown, Lake Road	Developable	0.9	5																							
836	Former Depot, Pricess Royal Barracks	Discounted	5.3	-																							
906	Land at Guildford Road	Discounted	0.6	-																							
504	Land North of Lake Road	Discounted	0.5	-																							
923	Land East of St Cross Road & North of Lake Road	Discounted	0.4	-																							
926	Land adj to Wykeham Park House, St Catherines Road	Discounted	0.3	-																							

Ref	Name	Status	Area (ha)	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt	
378	51-57 Deepcut Bridge Road	Discounted	0.1	-																								
<b>Frimley</b>																												
907	Sir William Siemens Square, Frimley	Deliverable	3.1	175																								
830	Land at Pineridge, Old Bisley Road	Discounted (but 'broad location')	102	-																								
837	Former Playing Field Lane	Discounted	0.6	-																								
566	34 & 36 Station Road	Discounted	0.1	-																								
<b>Frimley Green</b>																												
299	Land at East Curve, Sturt Road	Developable	1.5	60																								
512	SC Johnson, Frimley Green Road	Discounted	27	-																								
329	251 Frimley Green Road	Discounted	0.2	-																								
195	214-216 Frimley Green Road	Discounted	0.2	-																								
<b>Lightwater</b>																												
908	103 - 109 Guildford Road	Deliverable	0.4	21																								
909	Land South of Sundew Close, Guildford Rd	Discounted	1.1	-																								

Ref	Name	Status	Area (ha)	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt
910	Land Rear of 160 - 162 MacDonald Road	Discounted	0.8	-																							
911	Land rear of 164 MadDonald Road	Discounted	0.2	-																							
<b>Mytchett</b>																											
912	Land adjacent to Sherrard Way	Developable	4.0	16																							
1000	10 Willow Close	Developable	0.5	7																							
<b>West End</b>																											
178	Land east of Benner Lane <sup>44</sup>	Developable	7.6	16																							
840	Land at 32 Benner lane	Developable	0.4	8																							
153	Land South of Fenns Lane	Developable + Shortlisted 2022	6.4	7																							
799	Land North of Old House Lane	Developable + Shortlisted 2022	1.8	6																							
813	Land at Oak Farm House	Shortlisted 2022	14	-																							
913	Land South of Beldam Bridge Road	Shortlisted 2022	2.5	-																							
374	Land at Pankhurst Farm	Discounted	9.5	-																							

<sup>44</sup> This site has been significantly reduced in extent since the analysis was run in 2021.

Ref	Name	Status	Area (ha)	# homes (C3)	AQMA	SRN	SPA	SSSI	SNCI	Ancient woodland	Priority habitat	TPO	Conservation area	Listed building	RPG	Locally listed	Archaeology	Flood zone	Town centre	Local centre	School	Train station	Bus stop	Nature reserve	Greenspace	IMD	Green Belt
914	B/n Little Down & Whitedown Cottage, Bagshot Rd	Discounted	1.6	-																							
816	Gazes, Old House Lane, Bisley	Discounted	0.3	-																							
<b>Windlesham</b>																											
844	Land at Chamless	Deliverable	0.8	20																							
1004	St Margarets Cottage & The Ferns, Woodlands Lane	Deliverable	0.9	16																							
1011	Ming Restaurant, London Road	Deliverable	0.2	8	A new site since 2021 and so not analysed																						
834	Broadway Green Farm, Broadway Road	Developable	2.8	5																							
809	Land East of Snows Ride	Shortlisted 2022	16	-																							
609	Land north Reserve Site, Heathpark Drive	Shortlisted 2022	2.8	-																							
915	Land rear of 1-31 Broadley Green	Shortlisted 2022	0.6	-																							
445	Windlesham Garden Centre, London Road	Discounted	4.1	-																							
276	Land East of Snows Ride and Hatton Hill	Discounted	3.2	-																							
1005	Meadow Farm, Kennel Lane	Discounted	2.6	-																							
765	Windlesham South Garage, London Road	Discounted	0.3	-																							