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Sent by email to: planning.consultations@surreyheath.gov.uk

17th September 2024

Dear Sir or Madam,

Pre-submission Surrey Heath Local Plan (Regulation 19) Consultation

Thank you for consulting Surrey County Council (SCC) on the Pre-submission Surrey Heath Local Plan 2019 – 2038. This is an officer response that has been agreed with the Cabinet Member for Highways, Transport and Economic Growth.

Key issues for the county council are the implications of the Pre-submission Local Plan's policies and proposals for infrastructure for which the council is the provider and the council's statutory responsibilities in relation to minerals and waste planning, highways and transport, education, as responsible body for the Local Nature Recovery Strategy and as the lead local flood authority for Surrey. The Pre-submission Plan has been shared with relevant SCC teams who have confirmed they support the policies of relevance to their service area and thank Surrey Heath Borough Council for addressing our previous comments provided at the Regulation 18 Consultation. We have the following minor comments on both policy wording and supporting text.

Section 1: Key Challenges, Vision and Objectives

SCC welcomes the text set out in paragraph 1.12: County-wide Plans and Strategies but would suggest some wording changes:

Replace - The County Council is also responsible for Minerals and Waste Planning. The Surrey Minerals Plan, 2011 and the Surrey Waste Local Plan 2020 will be replaced by a Joint Surrey Minerals and Waste Local Plan to be adopted in 2027. The Waste and Minerals Local Plans show areas of safeguarding in the Borough which are shown on the Policies Map.

With the following text - Surrey County Council are responsible for both minerals and waste management development in the county. Both the Surrey Minerals Plan 2011 and the Surrey Waste Local Plan 2020 are in place and make up part of the existing local development framework, in addition work is underway on the preparation of a joint Minerals and Waste Local Plan which is currently set to be adopted in 2027. Both current

Minerals and Waste Plans identify areas/sites which should be safeguarded from other development in the Borough which are shown on the Policies Map.

Section 2: Spatial Strategy

We welcome that the plan includes a requirement for a Health Impact Assessment (HIA) for certain developments. We would recommend that text is added to paragraph 2.53 that links to existing SCC guidance on Health and Spatial Planning in Surrey, and guidance on HIAs which includes approaches which may be considered to ascertain when an HIA should be requested from a developer:

[Information on Health and Spatial Planning in Surrey July 2024 - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/information-on-health-and-spatial-planning-in-surrey-july-2024)

[Health Impact Assessment Guidance Statement July 2024 - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/health-impact-assessment-guidance-statement-july-2024)

We would also recommend that paragraph 2.53 provides a link to the Joint Strategic Needs Assessments and that it is used to identify relevant health needs:

[Joint Strategic Needs Assessment | Surrey-i \(surreyi.gov.uk\)](https://www.surreyi.gov.uk/joint-strategic-needs-assessment)

Section 4: Town Centres, Retail and Economy

SCC has been promoting the implementation of car clubs on larger scale developments. While this is mentioned in Policy IN2: Transportation, we would recommend that it is also included under point 2 of Policy CTC3: Movement and Accessibility. This policy includes possible mitigation and improvements, and it would be useful to mention that we will be looking to incorporate car clubs into developments that are located close or within the town centre.

Section 5: Infrastructure

Paragraph 5.13 makes reference to the age range of 0-19 “and Special Educational Needs”. Responsibilities for those with Special Educational Needs extend up to the age of 25 if the young people have an Education, Health and Care Plan (EHCP). We would recommend adding this to the text as there is a risk that the current wording may be interpreted as only those 0-19 which would then exclude those with an EHCP up to 25. We would recommend the following wording:

“This guidance reinforces the need for developer contribution to include education of all phases (age 0-19) and Special Educational Need (including those with an Education, Health and Care Plan up to the age of 25).”

Section 6: Environment

As responsible authority for the Local Nature Recovery Strategy (LNRS), SCC welcomes and appreciates the inclusion of references to the LNRS.

Policy E6: Flood Risk and Sustainable Drainage, Part 3d should be amended as follows as currently written it is not correct:

- *d. site drainage systems are designed to contain the 1 in 100 year rainfall event ~~for a 1 in 100 year storm event~~, applying the appropriate allowance for climate change for the type of development in consultation with the lead local flood authority and;*

Policy E7 Part f ‘Expect an appropriate buffer for ordinary watercourses that is sufficient to protect and enhance the biodiversity and amenity value of the watercourse.’ conflicts with paragraph 6.85 ‘Ordinary watercourses are expected to be provided with a minimum 8m buffer on both sides’. Policy E7, part f should be changed as follows:

‘Expect a minimum 8m an appropriate buffer on both sides that is sufficient to protect and enhance the biodiversity and amenity value of the watercourse’

We are considering updating the Surrey Landscape Character Assessment (2015) over the next year or so but do not currently have any confirmed plans. We would therefore suggest that references to this study within policy E8 and relevant paragraphs of the draft Plan include a comment as follows: Surrey Landscape Character Assessment 2015 (and any subsequent updates).

Section 8: Design and Heritage

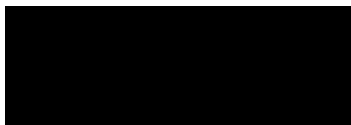
We welcome the policies on design and heritage and have a few minor comments as follows:

- The phrase “listed buildings” in paragraph 8.58 should be capitalised, as it is elsewhere.
- Paragraph 8.62 could make mention of including Locally Listed sites in its list of historic environment elements which contribute to Surrey Heath’s character and sense of place. The draft Local List has been produced by SCC since the 2022 consultation and is soon to be adopted by Surrey Heath Borough Council so is now in a position to be incorporated into this document. We do however note and welcome the inclusion of relevant provision on this issue in Policy DH7, sections 17 and 18.
- Paragraph 8.74 is particularly welcomed and will provide clarification for applicants.
- We welcome the inclusion of paragraphs 8.76 – 8.79 and look forward to supporting the council in their stated aim of preparing a Heritage Strategy for the Borough, should SCC assistance be helpful.
- Policy DH7 has inconsistent capitalisation of the phrase “Scheduled Monuments”. It is capitalised in paragraph 4, but not so twice in paragraph 15, which should be corrected. There is also inconsistent capitalisation of the phrase “locally listed”, which is capitalised generally throughout the heritage section (e.g. paragraph 8.59) but not within Policy DH7, sections 17 and 18. We would recommend capitalisation of the phrase as being correct.

We welcome policy DH8: Building Emissions Standards which will promote net zero development in Surrey Heath and will meet regional and national objectives. The policy is strongly aligned with the objectives and criteria established through the SCC countywide net zero planning programme which is coordinating decarbonised and energy efficient new development across Surrey through local plan policies. The finalised countywide guidance is imminent, and we would recommend that reference is made to the guidance (Surrey Viability Toolkit: An evidence study to support planning policies which deliver Net Zero Carbon developments) in the Local Plan or supporting evidence.

I hope these comments are helpful. If you require further information, please contact Nikki Nicholson at [REDACTED]

Yours sincerely,



Nikki Nicholson
Principal Planning Officer
Surrey County Council