	<p>Surrey Heath Borough Council</p> <p>Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</p> <p>Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to: planning.consultation@surreyheath.gov.uk
OR
Planning Policy and Conservation, Surrey Heath Borough Council,
Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:
Part A – Personal Details
Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)
Please fill in a separate sheet for each representation you wish to make.

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

Please read the separate guidance notes before completing this form.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>		
Title	Miss	
First Name	Ilaria	
Last Name	Sutton	
Job Title (where relevant)	Graduate Planner	
Organisation (where relevant)	Stantec	
Address Line 1		The Blade
Line 2		Abbey Square
Line 3		Reading
Post Code		RG13BE
Telephone Number		[REDACTED]

E-mail Address

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	X	
• The independent examiner's recommendations are published?	X	
• The Local Plan has been adopted?	X	

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

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

Part B – Please use a separate sheet for each representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

Stantec (on behalf of The Longcross Partnership)

3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph

Policy

SS1

Other, e.g.
policies map,
table, appendix

4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)

Yes

X

No

4.(2) Sound (please refer to guidance notes)

Yes

No

X

4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)

Yes

X

No

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Pre-Submission Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. You are advised to read our Representations Guidance note for more information on legal compliance and soundness.

Proposed Removal of Longcross Studios from the Green Belt

As detailed in the accompanying letter, we previously participated in the Local Plan process by submitting representations to the 'Draft Surrey Heath Local Plan: Preferred Options (2019-2038)' Consultation in May 2022 (see Appendix 2). These representations assessed the Site against Green Belt functions to determine the suitability of its release from the Green Belt. The aim was to secure the Site's removal, thereby enabling development opportunities (e.g., for new employment) supported by the Local Plan's other emerging policies, while ensuring minimal or no landscape impact or visual harm to the surrounding area.

SHBC's Green Belt Review ('GBR') (January 2022) excluded the Site from its assessment due to its proximity (within 400 metres) to the Thames Basin Heaths Special Protection Area ('TBHSPA'), which is considered a constraint for new residential development. As stated in our previous submission, this approach was erroneous since the Site is designated as a Strategic Employment Site and not promoted for residential development. The Stantec Landscape and Visual Appraisal ('LVA') and Green Belt Review ('GBR') submitted with our response to the Regulation 18 Consultation (see Appendix 2) concluded that the Site does not contribute to the purposes of the Green Belt.

Whilst the Draft NPPF (July 2024) may not apply to the preparation of this Local Plan as it is subject to the transitional arrangements and, at the time of writing, the Draft NPPF attracts little weight in decision making, the Site clearly aligns with the proposed definition of 'grey belt', which is Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes. Therefore, even had the Site not been included as being released from the Green Belt, as 'grey belt' redevelopment for employment uses it would be supported by the proposed changes to national policy.

Paragraph 144 of the Draft NPPF states that “plans should give first consideration to previously developed land in sustainable locations” when it is necessary to release Green Belt land for development. Whilst not adopted, it would be reasonable to consider this approach when determining a site’s suitability for redevelopment and justifying its release from the Green Belt.

For the reasons set out above, the Site’s proposed removal from the Green Belt is sound. It was welcome to see the Officer’s Report to SHBC’s Executive (see Appendix 1), dated the 17th July 2024, supporting the alteration of the Green Belt boundary to remove the remaining part of Longcross Garden Village from the general extent of the Green Belt.

Additionally, our client welcomes the publication of the Green Belt Exceptional Circumstances Topic Paper (August 2024) by SHBC, which concludes that ‘exceptional circumstances’ for the release of the Site have been demonstrated, based on the evidence base and previous representations made by Stantec.

We are pleased that SHBC accepts this position, as reported on page 72 of the Council’s Regulation 19 Consultation Statement (July 2024). In conclusion, we fully support the Site’s removal from the Green Belt.

Compliance with National Policy

Chapter 13 of the NPPF (2023) details the approach to the protection and release of Green Belt land. Paragraph 145 of the NPPF sets out that “strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”. As required by paragraph 146, the strategic policy-making authority should be able to explain the exceptional circumstances to justify these Green Belt changes, which “will be assessed through the examination of its strategic policies”. It is therefore unclear why sites removed from the Green Belt such as Longcross Studios, alongside reference to ‘exceptional circumstances’, have not been included in the Pre-Submission Local Plan. Consequently, we contend that the Plan has not taken a sound approach to addressing the Green Belt boundary revisions and that it is not consistent with National Policy.

Whilst the Site is shown on the draft Policies Map as being removed from the Green Belt, the Site’s removal from the Green Belt does not appear to be identified or referenced within the policies, supporting text or elsewhere in the Local Plan.

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination) You will need to say why each modification will make the Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As outlined above, we support the position set out in the evidence base, however we consider the Local Plan to be unsound due to:

- 1) Failure to satisfy paragraph 145 of the NPPF which requires strategic policies in Local Plans to “establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”.
- 2) Whilst set out in SHBC’s Exceptional Circumstances Topic Paper, the Local Plan does not include detail or reference that SHBC has concluded that exceptional circumstances exist to release land from the Green Belt including the Site. This may be inconsistent with the requirements of paragraph 146 of the NPPF.

The soundness issues set out above are capable of being rectified through modifications to the Local Plan. In this regard, we propose the following modification which seeks to insert a new paragraph below paragraph 2.28 of the supporting text to Policy SS1 of the Local Plan. This could also be included within Policy SS1 itself if deemed necessary by the Inspector.

Stantec’s proposed modifications are shown in **bold underlined text**.

2.28 Development opportunities in the Countryside Beyond the Green Belt have been explored through the Countryside Capacity Study and SLAA and suitable sites for new homes included in the supply. Development in land designated as Countryside Beyond the Green Belt will be assessed in line with national policy and Local Plan policies, including Policy GBC2.

2.28a In accordance with the NPPF, the Borough Council has concluded that some limited alterations to remove land from the Green Belt are justified by 'exceptional circumstances.' The Policies Map identifies the current Green Belt boundary, which has been altered to remove the Longcross Studios Strategic Employment Site, to remove land to accommodate an extension to the Swift Lane Gypsy and Traveller Site, and to 'inset' Chobham within the Green Belt.

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate.

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We confirm that we wish to participate in the oral evidence stage of the Examination to expand on the points made within this representation. The above is an important element of the Local Plan which sets the context for the overall adopted strategy, and the Examination will require detailed consideration and evidence that reflects the issues raised.

Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

19th September 2024

Our Ref: 333101422/A3/IS

BY EMAIL

PRE-SUBMISSION SURREY HEATH LOCAL PLAN (2019-2038): REGULATION 19 REPRESENTATIONS SUBMITTED ON BEHALF OF THE LONGCROSS PARTNERSHIP

We write on behalf of our client, The Longcross Partnership, in response to the Surrey Heath Local Plan (2019-2038) Pre-Submission (Regulation 19) Consultation.

The representations set out in the enclosed completed form relate to Longcross Studios, the land which forms part of Longcross Garden Village ('the Site'), which is located on the north-eastern edge of Surrey Heath Borough. Our client owns the Site alongside a portion of the land within Longcross Garden Village. The Site is leased to Netflix, which operates across both Longcross North and Longcross South.

Overview

As background, in January 2017, the Site was identified by the Department for Communities and Local Government ('DCLG') as a Locally Led Garden Village. The majority of Longcross Garden Village falls within the administrative area of Runnymede Borough Council ('RBC') and is allocated under Policy SD9: Longcross Garden Village of the adopted Runnymede Local Plan 2030 for a mixed-use development comprising a minimum of 1,700 homes, supporting facilities and community infrastructure, employment, green and blue infrastructure, and a package of sustainable transport measures. The part of Longcross Garden Village within Runnymede Borough was removed from the Green Belt.

The Site is situated on the eastern edge of Surrey Heath Borough, forming the western part of Longcross Garden.

A small area of land in the south-western part of the Site is identified as part of the Chobham Cobham Special Area of Conservation. Within the adopted Local Plan, the Site is identified as a 'Major Developed Site' in the Green Belt.

The Pre-Submission Local Plan includes a proposal to release the Site from the Green Belt and to designate it as a Strategic Employment Site.

Summary

Our client is broadly supportive of the continued designation of the Site as a Strategic Employment Site and its proposed release from the Green Belt through the Pre-Submission Local Plan.

Paragraph 3.28 of the Officer's Report to the Executive Committee (Appendix 1), dated the 17th July 2024, states that the revisions to the Green Belt to remove the Site is made in response to the representations submitted by Stantec on behalf of The Longcross Partnership at Regulation 18 stage. In seeking to avoid repetition, these previous representations are provided in Appendix 2.

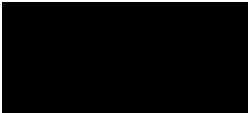
The Site's removal from the Green Belt is further discussed in Surrey Heath Borough Council's ('SHBC's') Green Belt Exceptional Circumstances Topic Paper (2024). This sets out the site-specific 'exceptional circumstances' justifying the Site's removal from the Green Belt, ensuring a consistent and defensible boundary that aligns with the adjoining Longcross Garden Village in RBC.

Whilst our client supports the principle of the Site's removal from the Green Belt and supports the exceptional circumstances case set out by SHBC in its Topic Paper, we are concerned that the Pre-Submission does not comply with national planning policy, particularly concerning references to the proposed changes to the Green Belt, and therefore its overall 'soundness'. On this basis, we have prepared a representation form addressing the emerging 'Policy SS1: Spatial Strategy' and propose a modification to the associated supporting text/policy.

It is our understanding that SHBC intends to submit the Local Plan under the transitional arrangements set out in paragraph 226c of the Draft National Planning Policy Framework (July 2024), and therefore for this Local Plan to be examined under the current version of the NPPF (December 2023). These representations therefore refer to the current version of the NPPF.

We trust that these representations will be taken as duly made and would welcome confirmation of receipt. We request that we are invited to participate in relevant examination hearing sessions. If you require any additional information or have any queries, please do not hesitate to contact the writer.

Yours faithfully,



ILARIA SUTTON
Graduate Planner
STANTEC UK LIMITED

Appendix 1

Appendix 1 – Officer’s Report to Surrey Heath Borough Council Executive Committee (8 July 2024)



Surrey Heath Borough Council
Surrey Heath House
Knoll Road
Camberley
Surrey GU15 3HD
Telephone: (01276) 707100
Facsimile: (01276) 707177
DX: 32722 Camberley
Web Site: www.surreyheath.gov.uk

Division: Legal & Democratic Services
Please ask for: Rachel Whillis
Direct Tel: [REDACTED]
E-Mail: democratic.services@surreyheath.gov.uk

Monday, 8 July 2024

To: The Members of the **EXECUTIVE**
(Councillors: Shaun Macdonald (Chair), Alan Ashbery, Kel Finan-Cooke, Lisa Finan-Cooke, Leanne MacIntyre and Morgan Rise)

Dear Councillor,

A meeting of the **EXECUTIVE** will be held at Council Chamber, Surrey Heath House, Knoll Road, Camberley, GU15 3HD on Wednesday, 17 July 2024 at 6.30 pm. The agenda will be set out as below.

Please note that this meeting will be recorded.

Yours sincerely

Damian Roberts

Chief Executive

AGENDA

Pages

Part 1 (Public)

1. **Apologies for Absence**
2. **Declarations of Interest**

Members are invited to declare any interests they may have with respect to matters which are to be considered at this meeting. Members who consider they may have an interest are invited to consult the Monitoring Officer or the Democratic Services Officer prior to the meeting.

3. **Public Question Time**

To answer any questions received in accordance with Part 4, Section E of the Constitution.

4. **Questions by Members**

The Leader and Portfolio Holders to receive and respond to questions from Members on any matter which relates to an Executive function in accordance with Part 4 of the Constitution, Section B Executive

Procedure Rules, Paragraph 16.

**5. Pre-Submission Surrey Heath Local Plan (2019 - 2038):
(Regulation 19)**

3 - 488

Annexes 2 and 3

Annexes two and three to agenda item five:

Annex 2: <https://surreyheath.box.com/s/muhbluvll6qqmxq1y0ixoac56cj1ycwl>

Annex 3: <https://surreyheath.box.com/s/lqqzciomnm3b0z8imt4npjrmna5cu7v1>

Surrey Heath Borough Council

Executive

17th July 2024

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

Portfolio Holder:	Cllr Alan Ashbery – Homes, Planning & Enforcement
Strategic Director/Head of Service	Bob Watson / Gavin Chinniah
Report Author:	Jane Reeves – Planning Policy Manager
Key Decision:	Yes
Portfolio Holder signed off the report:	24/06/24
Wards Affected:	All

1. Summary and purpose

- 1.1 This report sets out the purpose of, and requirements for the next stage of the Local Plan, known as the Pre-Submission Regulation 19 stage. The Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19), thereafter shortened to Pre-Submission Local Plan, is based on the content of and consultation on the Draft Surrey Heath Local Plan Preferred Options (2019-2038): (Regulation 18) and takes account of the Additional Gypsy and Traveller and Travelling Showpeople Allocations consultation, and all the representations submitted as part of these Regulation 18 consultations.
- 1.2 At the Draft Local Plan stage (Regulation 18), which is the key stage for public engagement, the Council undertook extensive public consultation and engagement activities to enable residents to get involved in the process and in order to seek views on planning for the Borough. Following this the Council has reviewed all the feedback received and comments set out in the submitted representations, together with additional evidence, and has revised the Draft Local Plan, as appropriate, to produce the Pre-Submission Local Plan. A summary of the key issues raised in public consultations and of the main changes that have been made in response is set out in Annex 5.

- 1.3 It is important to highlight as part of the development of the new Local Plan, that a Local Plan Working Group (LPWG), was formed, made of Councillors cross-party from the Council. The LPWG have discussed in detail a full range of spatial strategies, topics and policies over a number of years and this process has been very collaborative. As a result of all this work, detailed policies and site allocations supported by the LPWG have been developed, reviewed and amended in the light of consultation responses and Member feedback. At a meeting on 8 May 2024 the LPWG endorsed and supported this Pre-Submission Local Plan being considered for publication by Executive and Council.
- 1.4 The publication of the Pre-Submission Local Plan provides an opportunity for formal representations to be submitted. However, it is important to explain that at this stage we are no longer seeking comments to shape the content of the document. The Council seeks representations on behalf of the Secretary of State on legal compliance and the four tests of soundness, which are whether the Plan is positively prepared, justified, effective and consistent with national policy.
- 1.5 This report seeks endorsement to publish the Pre-Submission Local Plan and supporting documents. Delegated authority is also requested to the Head of Planning in consultation with the Sustainable Transport and Planning Portfolio Holder to submit the Local Plan and formal representations made (at Regulation 19), together with supporting documents, to the Secretary of State for independent examination and thereafter to progress the Local Plan through the examination process.
- 1.6 In summary the Pre-Submission Local Plan will ensure delivery of the following:
 - A positive vision for the future of Surrey Heath balancing the need for development against significant environmental constraints.
 - A strategy to focus new development within the settlement areas to the West of the Borough to optimise delivery of development in the most sustainable and accessible locations.
 - Support for high quality and high-density development on key sites in Camberley Town Centre to provide new homes, support regeneration and future vitality and viability.
 - Support for the local economy by designating 16 strategic and locally important employment sites.
 - Promotion of healthy, sustainable and cohesive local communities through good design and supporting infrastructure delivery.
 - Support for action on climate change through mitigation and adaptation measures, including facilitating active travel.
 - Protection of environmental assets and sets policies to secure biodiversity net gain.

- 1.7 The objectives of the Pre-Submission Local Plan are broad and cross-cutting and will contribute to a range of corporate work. The Local Plan will help deliver priorities in the Council's Strategy under the themes of Protect our Environment, Promote Healthier and More Inclusive Communities and Support a Strong Economy and Create More Homes. More detail is set out in section 6 of this report.

2. Recommendation

- 2.1 The Executive is advised to RECOMMEND to Full Council: the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19) and RESOLVE that:
- (i) The Pre-Submission Surrey Heath Local Plan (2019 – 2038): (Regulation 19) be endorsed;
 - (ii) The Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19), Mapping booklet, Policies Map and Sustainability Appraisal, attached at Annexes 1, 2, 3 and 4 and supporting documents be agreed for a period of 6 weeks publication from 7 August to 20 September 2024; and
 - (iii) Authority be delegated to the Head of Planning in consultation with the Portfolio Holder for Homes, Planning & Enforcement to:
 - a. Agree minor changes to the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19) and other core documents.
 - b. Submit the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19), Mapping booklet, Policies Map, Sustainability Appraisal and supporting documents to the Secretary of State, in accordance with the Local Development Scheme timetable.
 - c. Progress the Local Plan through the Examination, including agreeing and publication of Modifications to the Local Plan.

3. Background and Supporting Information

Local Plan content

- 3.1 National planning guidance requires local authorities to produce local plans. The process for preparing Local Plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. This includes consultation on draft versions of local plans prepared in accordance with the requirements set out under Regulation 18, which the Council has undertaken in 2018 and 2022. Following this stage and the consideration of comments submitted, the next stage is publication of the Pre-Submission Local Plan in accordance with requirements set out under Regulation 19, followed by Submission to the Secretary of State.

- 3.2 The new Surrey Heath Local Plan will provide a robust and up-to-date planning framework for future development in the Borough. It includes a vision, objectives and spatial strategy for the level and distribution of development, site allocations and a suite of development management policies for the period up to 2038. Once adopted, the Local Plan will replace current Development Plan policies comprising:
- Saved policies in the Surrey Heath Local Plan, 2000
 - Core Strategy and Development Management Policies, 2012
 - Camberley Town Centre Area Action Plan, 2014
- 3.3 The Pre-Submission Local Plan is informed by national planning policy and guidance, other County and local plans and strategies and a detailed evidence base on matters such as housing needs, flood risk, climate change, Gypsy and Traveller needs, climate change and future economic needs. The consultation responses from the Issues and Options consultation in 2018 and two Preferred Option consultations in 2022 have been taken into account, and these are summarised in a background evidence document. A summary of the key issues raised in consultation responses and changes made to the draft Local Plan is set out in Annex 5.
- 3.4 In preparing the Pre-Submission Local Plan, consideration has been given to the considerable environmental and policy constraints that affect Surrey Heath Borough. These include the Thames Basin Heaths Special Protection Area, which affects 23% of the borough with a further 19% in the 400m buffer zone within which residential development cannot take place. Approximately half of the Borough lies within the metropolitan Green Belt and there are areas at risk of flooding and with important ecological habitats.

Housing

- 3.5 A key purpose of a Local Plan is to set out the scale and location of new homes to be built over the plan period. In determining the housing requirement for the Borough, over the period to 2038, officers have had regard to a range of evidence. The Government's standard methodology sets an annual housing need figure for Surrey Heath of 321 dwellings per annum, which over the Plan period, totals 6,111 new homes.

- 3.6 A number of studies have been undertaken to inform the approach to housing delivery, including a Countryside Capacity Study, a Strategic Land Availability Assessment and a Local Housing Needs Assessment. In total 1,501 new homes have already been built in the Borough during period 2019 to 2023 and a further 1,990 homes have planning permission. This includes, for example, the development of the former Princess Royal Barracks at Deepcut, which will provide 1,200 dwellings and which is under construction. The remaining supply will come from sites allocated for housing in the draft Local Plan, sites identified in the Strategic Land Availability Assessment (SLAA) and 'windfall' sites¹.
- 3.7 Work undertaken on potential capacity identified that sites from within settlements and appropriate Countryside beyond the Green Belt sites, and other sources listed above, did not provide sufficient capacity to deliver the housing need set out by the standard methodology. In line with guidance in national planning policy and under the duty to co-operate, discussions were held with neighbouring authorities as to whether unmet needs could be met elsewhere.
- 3.8 The adopted Hart Local Plan sets out a commitment to deliver 41 dwellings per annum towards meeting unmet needs in Surrey Heath. Through duty to co-operate discussions Hart District Council has reconfirmed this commitment. Over the overlapping Local Plan timescales (2019 – 2032) this means that a total of 533 new homes will be delivered in Hart to meet unmet needs in Surrey Heath.
- 3.9 To determine the housing requirement figure for the Pre-Submission Local Plan account has been taken of environmental and planning constraints, the standard methodology local housing need figure, Local Housing Need Assessment, the Countryside Capacity Study, the Strategic Land Availability Assessment land supply in the Hart Local Plan to arrive at a Local Plan housing requirement figure of 5,578 new homes. This is the minimum number of homes to be delivered in the Borough up to 2038.
- 3.10 It is important to demonstrate that there is some flexibility in the identified supply of sites to deliver the Local Plan housing requirement figure of 5,578, particularly at this stage in the plan making process, so the housing supply from all sources identifies a supply buffer of 434 homes. To demonstrate deliverability of the Pre-Submission Local Plan housing requirement of 5,578 new homes plus a buffer the Plan identifies the potential to deliver 6,012 new homes, as set out in Table 1 below.

¹ Sites not specifically identified through the Local Plan process, for example small sites of under 5 dwellings.

3.11

Table 1 – Number of dwellings per delivery source by location in the borough

?

Location	Number of dwellings (net) per source of delivery			
	Completions	Commitments	SLAA	Total
West of the Borough				
Bagshot	196	122	112	430
Camberley	391	328	1,319	2,038
Deepcut	320	1,014	61	1,395
Frimley	145	79	230	454
Frimley Green	12	173	60	245
Mytchett	126	137	23	286
Total	1,190	1,853	1,805	4,848
East of the Borough				
Bisley	1	3	22	26
Chobham	58	17	106	181
Lightwater	2	3	21	26
West End	238	1	37	276
Windlesham	12	157	49	218
Total	311	181	235	727
Non-Spatial				
Windfall Allowance	-	-	481	481
Lapse-Rate	-	-44	-	-44
Total	1,501	1,990	2,521	6,012

3.12 A significant proportion of new homes will be located within Camberley town centre contributing to future regeneration proposals. Completions are new homes that have already been built and commitments are homes that are either under construction or which have planning permission. A number of sites that are specifically allocated for residential development as set out in Policy HA1 in the Local Plan (Annex 1). In addition, the following strategic sites are allocated and are subject to specific Local Plan policies:

- Mindenhurst (former Princess Royal Barracks) (Policy HA4)– 1,200 new homes (some already completed/under construction);
- London Road Block (Policy HA2)– approximately 550 new homes and other town centre uses;
- Land East of Knoll Road (Policy HA3) – approximately 340 new homes.

3.13 The spatial strategy for the delivery of new homes is carried forward from the Draft Local Plan to the Pre-Submission Local Plan. The main changes to policies to deliver new homes are summarised as:

- The introduction into Policy HA1 of a list of smaller site allocations comprising development sites with a capacity of 10 to 24 new homes (gross).
- The removal of sites from Policy HA1 that currently benefit from planning permission.
- The removal of the former House of Fraser site (Land East of Park Street) as a housing allocation site and allocation for a mix of town centre uses, in a new Policy CTC4, to support flexible development options.
- Additional site allocations are made at St James House, Camberley; Land off Spencer Close, Frimley Green (former safeguarded transport site); Land At Loen, Deepcut; and 61 – 63 London Road, Camberley.
- Updates to reflect the information in the latest Strategic Land Availability Assessment 2023.

Gypsies and Travellers and Travelling Showpeople

3.14 The Council has a responsibility through the National Planning Policy Framework (NPPF), Planning Policy for Traveller Sites (PPTS) and other legal requirements to assess and plan for the housing needs of all residents, including the Gypsy and Traveller and Travelling Showpeople communities. A Gypsy and Traveller Accommodation Assessment (GTAA) was prepared in 2020, to provide robust evidence in respect of Gypsy, Traveller and Travelling Showpeople needs for Surrey Heath across the Plan period. The GTAA was based on the PPTS definition of Gypsies and Travellers/Travelling Showpeople as set out in the 2015 PPTS, which excluded those who have ceased travelling permanently from the definition. The assessment identified a need for at least 32 pitches for Gypsies and Travellers and 14 plots for Travelling Showpeople meeting the planning definition. However, in December 2023 the Government revised the planning definition to include those who have ceased to travel permanently. As a result, the identified need for Gypsies and Travellers meeting the planning definition has increased to 35 pitches. The Council also has an identified need for a further pitch for Gypsies and Travellers whose travelling history is unknown and 29 pitches for Gypsy and Traveller households that do not meet the revised planning definition.

3.15 Following the granting of planning permission for two pitches on a site to the south of the M3 junction in Lightwater, the outstanding need is for 33 pitches. There is also resolution to grant planning permission for two pitches at Four Oaks, Highams Lane, subject to the completion of a legal agreement, which would reduce the need to 31 pitches.

- 3.16 A number of options have been explored, over a five-year period, to identify sufficient sites to meet this need as set out in supporting evidence base papers. However, this has been challenging given the limited availability of land to deliver pitches and plots, in addition to the environmental and policy constraints in the Borough. Five 'Call for Sites' exercises have also been undertaken across the plan-making process, however only one site has been submitted for consideration through these exercises. This was for a site of up to 12 pitches as part of a wider 1,500 dwelling development at Fair Oaks being promoted through the Local Plan process. This site is not part of the preferred spatial strategy for the Borough and has evidenced constraints to delivery, including highways and air quality issues. The Council has also engaged with neighbouring Local Authorities through the duty-to-cooperate but no authority has identified any capacity to help meet needs.
- 3.17 The Council identified one proposed site allocation for 4 pitches at Diamond Ridge Woods in the Draft Surrey Heath Local Plan: Preferred Options (Regulation 18) consultation, undertaken between March to May 2022. Following further work, the Council consulted on Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople in August and September 2022. This identified three proposed site allocations, at Swift Lane for an extension for 5 pitches, at Broadford Lane for up to 16 pitches and at Bonds Drive for an extension for 5 to 9 Travelling Showpeople plots.
- 3.18 Further site investigations have identified protected species at Diamond Ridge Woods and significant site delivery barriers for land at Broadford Lane, such that these two sites cannot be demonstrated to be deliverable and therefore cannot be progressed as allocations in the Pre-Submission Local Plan (Regulation 19). In addition, legal and access constraints at the Bonds Drive site have prevented site investigations. As a result, there is insufficient evidence to demonstrate that the site is deliverable, and it cannot be progressed as a site allocation in the Pre-Submission Local Plan (Regulation 19).
- 3.19 The one site allocation the Council is progressing as an allocation in the Pre-Submission Local Plan is an extension to the Swift Lane site. There are contamination issues at Swift Lane, but these are considered to be surmountable.
- 3.20 The Council has reached the position where despite exhaustive efforts it is not able to identify any other sites for allocation that would meet the tests for soundness. As such, a number of Policies have been updated in the Pre-Submission Local Plan to provide a more permissive approach that will deliver unallocated Gypsy and Traveller sites through the planning application process. Changes have included setting out in Policy H9 that Rural Exception sites may be brought forward for Gypsies and Travellers and that pitches and plots will be considered acceptable in principle within the countryside beyond the Green Belt. A criteria based policy at H11 has also been updated, whilst retaining a requirement for traveller provision within housing sites of 100 or more homes. The detailed policy wording is set out in Annex 1.

Employment and Retail

- 3.21 Evidence prepared for the Local Plan suggests that there are a range of different economic forecasts and methodologies that can be used to determine how much employment land is needed in the Borough over the plan period. This results in lower and upper estimates of forecast floorspace need and takes and takes account of a combination of national and local data to inform estimates of future floorspace needs. After taking account of delivery within the plan period and extant planning permissions the residual forecast employment floorspace needs are set out in the table below.

Table of Residual Forecast Employment Floorspace Need

Residual Forecast floorspace need (sqm)	Lower estimate	Upper estimate
Office E(g)(i)/(ii)	11,000	20,300
Industrial and Storage/Distribution E(g)(iii)/B2/B8	4,600	22,600
Total all Employment classes	15,565	42,900

- 3.22 The industrial and storage / distribution needs are planned to be met from existing commitments and use of vacant land and intensification of sites within the allocated strategic and locally important employment areas. In the light of changing market requirements office floorspace growth needs are considered to be far less certain, with a focus more on improvements to the quality of existing stock, through refurbishment, rather than a requirement for additional land supply.
- 3.23 The Local Plan identifies the most important employment sites as either strategic or locally important employment sites and seeks to protect them for employment uses, where planning permission is required. The main changes to Local Plan employment policies are the allocation of Fair Oaks as a strategically rather than locally important employment area and the removal of the Strategic Employment Site Allocation on Knoll Road, in recognition of the conversion of significant number of buildings to residential use.
- 3.24 Evidence on town centre uses suggests that there is no need for additional retail floorspace in the Borough in addition to existing commitments and vacant floorspace and having regard to the changing way in which people shop and the growth of internet shopping. Camberley town centre will continue to be the focus for town centre uses along with the District and Local Centres, and the neighbourhood parades will continue to serve an important local function. As set out previously, a significant increase in the number of new homes in Camberley town centre is proposed.

Green Belt

- 3.25 National policy states that Green Belt boundaries should only be amended in exceptional circumstances and highlights the need to promote sustainable patterns of development when reviewing boundaries. The Council has concluded that there are no exceptional circumstances to release land from the Green Belt for housing. In line with national policy, capacity from other sources of supply in the Borough, along with provision for some unmet needs to be met from Hart District does not warrant the need for sites in the Green Belt to be released for housing.
- 3.26 The Draft Surrey Heath Local Plan: Preferred Options (2019-2038) (Regulation 18) set out that the current extent of the Green Belt will be maintained with the exception of the inseting of Chobham Village.
- 3.27 Historically Chobham village has been 'washed over' by the Green Belt. However, since the last review of the Green Belt boundaries in 1987 there have been changes to national planning policy regarding the approach to the designation of settlements within the Green Belt. Two broader Green Belt Studies have prepared to support the Local Plan, a Green Belt and Countryside Study, 2017 and a Surrey Heath Green Belt Review 2022. In addition, a specific Chobham Village Green Belt Study was undertaken. The Chobham Village Green Belt Study concluded that much of the settlement does not exhibit an open character and does not contribute significantly to the openness of the Green Belt. Combined with changes in national policy, the Pre-Submission Local Plan therefore includes the inseting of Chobham Village from the Green Belt, with minor boundary changes from those originally proposed at Regulation 18 stage.
- 3.28 The key change to the Green Belt introduced in the Pre-Submission Local Plan in response to representations is an adjustment of the Green Belt boundary at Longcross. This adjustment is to remove the part of the site within Surrey Heath from the Green Belt based on defensible boundaries to align with the adjoining Longcross Garden Village development allocation in Runnymede, which was recently removed from the Green Belt through the Runnymede Local Plan. To align with current national policy, it is also proposed to remove the existing Gypsy and Traveller site and the extension area at Swift Lane from the Green Belt.
- 3.29 No Green Belt sites are allocated for residential development in the Plan, although a number of sites were submitted by landowners/developers for consideration, including a proposal for a larger scale development at Fair Oaks. There is an assumption that some redevelopment of small brownfield sites in the Green Belt will take place to provide new homes over the Plan period. Policies for the Green Belt follow national planning guidance with development being strictly limited.

Environment and Sustainability

- 3.30 A key objective of the Local Plan is protection of the Borough's extensive environmental assets through a broad range of policies. This includes protection of the Thames Basin Heaths Special Protection Area and other areas of notable biodiversity and geodiversity, as well as securing 20% biodiversity net gain in relation to development impacts and protecting greenspaces.
- 3.31 Policies in the Pre-Submission Local Plan promote sustainability and seek to ensure that new developments contribute to climate change mitigation and adaptation. This includes helping to reduce carbon emissions by measures including low/ zero carbon design, improved energy efficiency, promoting sustainable modes of transport and supporting green infrastructure. In addition, the Climate Change mitigation policy is strengthened to include a requirement to deliver net zero carbon development on major sites, subject to viability. Policies also support climate change adaptation and healthy living through good design (as set out in Annex 1).
- 3.32 The key changes are the introduction of a new policy E7, which seeks to protect and where possible enhance water courses to deliver flood risk, biodiversity and green infrastructure benefits. In addition, other changes include the introduction of a criterion to mitigate risk of wildfires in Policy SS3b and wording changes to policies and supporting text, in response to comments from the Environment Agency and Surrey County Council.

Development Management Policies

- 3.33 The Pre-Submission Local Plan includes a number of non-strategic development management policies. These cover a broad range of matters including:

Housing – affordable housing, First Homes, specialist housing and loss of housing

Design and Heritage – overarching design principles, trees, space standards, density standards and heritage assets

Climate Change – building emission standards, renewable and low carbon energy systems, flood risk

Green Belt and Countryside – Green Belt policies, equestrian uses, landscape, rural economy

Natural Environment – biodiversity and biodiversity net gain, Thames Basin Heaths SPA, pollution

Infrastructure – green infrastructure, open space provision and protection, community facilities, transport and digital infrastructure

3.34 A number of changes have been made to these development management policies in response to representations to ensure the policy wording is clear, widen policy criteria, to respond to updates to the evidence base and to reflect changes in guidance (see Annex 5). The key change to highlight is the approach to affordable housing delivery set out in Policy H7(see Annex 1), which is now underpinned by a Local Plan Viability Study.

Sustainability Appraisal

3.35 A Sustainability Appraisal (SA) has been prepared to support the Pre-Submission Local Plan (Regulation 19) and is attached at Annex 4 [Note to CMT: document currently in draft form]. In line with statutory requirements, it will also be subject to publication. The purpose of the SA is to ensure that the Plan contributes to sustainable development and to assess different reasonable alternative approaches to the scale and location of future development as well as realistic policy options against a set of sustainability objectives. The findings of the SA support the spatial strategy and policy approaches set out in the Pre-Submission Local Plan.

Background evidence

3.36 National Policy and guidance sets out that Local Plans must be supported by appropriate evidence. A range of technical studies have been prepared either in-house or by external consultants to support the Pre-Submission Local Plan and are available on the Local Plan evidence base page of the website. Key evidence includes:

- Habitat Regulation Assessment 2024
- Strategic Land Availability Assessment 2023
- Local Housing Needs Assessment 2024
- Countryside Capacity Assessment 2020
- Local Plan Viability Assessment 2024
- Addressing Climate Change through the Surrey Heath Local Plan 2020
- Greenspaces Background Assessment 2024
- Infrastructure Delivery Plan 2024
- Strategic Flood Risk Assessment 2021
- Employment Land Technical Paper Update 2023
- Employment Supply Assessment 2023

- Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2020
- Gypsy Traveller and Travelling Showpeople Site Identification Paper 2022
- Green Belt Review 2022 & Addendum 2023
- Chobham Village Green Belt Boundaries Study 2022 & Addendum 2022
- Town Centre Uses and Future Directions Study 2021
- Strategic Highways Assessment Report 2024
- Playing Pitch Strategy 2023

Publication

3.37 Publication of the Pre-Submission Local Plan is proposed between 7 August and 20 September 2024. Publication actions must be consistent with the principles set out in the adopted Statement of Community Involvement and in summary will comprise:

- Notification to all those on the Planning Policy database (includes statutory consultees)
- Information on the Council's website
- Information in libraries and at where open to the public at Parish Council offices
- A Webinar posted onto the Council YouTube channel

4. Reasons for Recommendation

4.1 It is important that the Council has an up-to-date and robust planning framework to guide development which reflects current national policy and guidance. An up-to-date Local Plan ensures that the Council can guide development to the most appropriate locations rather than reacting to developers' proposals and risking the loss of planning appeals.

4.2 The Government has set out that local authorities should have an up-to-date Plan in place by December 2026 or risk Government intervention. The Local Development Scheme sets out the timetable for the remainder of the Local Plan preparation process.

4.3 The process for preparing Local Plans is set out in Regulations². These require that the Local Plan is published for the submission of representations prior to submission to the Secretary of State.

5. Proposal and Alternative Options

5.1 The available options for the Executive to consider are:

- i. to endorse the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19), Mapping booklet, Policies Map and Sustainability Appraisal as set out in Annexes 1, 2 3 and 4 of this report; or
- ii. to endorse the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19), Mapping booklet, Policies Map and Sustainability Appraisal as set out in Annexes 1, 2, 3 and 4 of this report with changes; or
- iii. to not endorse the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19), Mapping booklet, Policies Map and Sustainability Appraisal as set out in Annexes 1, 2, 3 and 4 of this report.

6. Contribution to the Council's Strategy

6.1 The Local Plan, once adopted, will help to deliver on the following themes:

- i. **Protect our Environment** – to protect and enhance our Natural Environment through a suite of policies, to support the drive to Net Zero working with communities and partners, to increase local biodiversity through biodiversity policies and the requirement to deliver biodiversity net gain.
- ii. **Support a Strong Economy and Create More Homes** – to help create more homes to meet local need through site allocations and policies to deliver affordable homes. To support the regeneration of Camberley town centre through a strategy to support redevelopment and regeneration. To support vibrant villages and local centres through policies to protect vitality and viability. To support business and investment through employment area allocations.
- iii. **Promote Healthier and More Inclusive Communities** – to promote health and well-being through policies to support high quality design, provide appropriate infrastructure and protect green spaces and natural environments.
- iv. **Campaign for residents** – to listen and engage residents through Local Plan consultations and to promote sustainable travel options through support for Local Walking and Cycling Infrastructure Delivery Plans.

² Regulation 18 of the Town and Country (Planning)(England) Regulations 2012

7. Resource Implications

- 7.1 There will be resource implications arising from progression of the Local Plan. However, there are no immediate resource implications arising from publication of the Pre-Submission Local Plan, beyond those allowed for within current budgets. Resources will be needed following Submission of the Local Plan for the appointment of an independent Inspector and a Programme Officer. Resources will also be needed for further legal advice on the Local Plan and further evidence from expert consultants. These costs are accounted for in the agreed 2024/2025 budget, subject to the approval of the requested carry forward budget amounts.

8. Section 151 Officer comments

- 8.1 The direct additional budgetary implications arising from this report are set out in paragraph 7.1 above. Whereas the Local Plan will involve a draw on Council budgets once approved, this is likely to be considerably less than the potential cost of not having a local plan.

9. Legal and Governance Issues

- 9.1 The preparation of the Local Plan is a statutory requirement of the Planning & Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. The Local Plan must be prepared in line with relevant legislation as well as having regard to national planning policy and guidance. The draft Local Plan will be afforded more weight in the determination of planning applications as it approaches adoption. At this stage only limited weight can be attributed to the policies.

10. Monitoring Officer Comments

- 10.1 No matters arising.

11. Other Considerations and Impacts

- 11.1 No matters arising.

12. Environment and Climate Change

- 12.1 The Council has a statutory duty to ensure that its Local Plan contributes to tackling climate change and to conserve and enhance biodiversity. In order to support policies in the Local Plan a Climate Change Study has been prepared. This has supported the development of policies in the Local Plan which seek to ensure that new developments contribute to climate change mitigation and adaptation and contribute to meeting the Council's overall targets for climate change. This includes a requirement to deliver net zero carbon development on major sites, subject to viability. Local Plan policies will also assist in the delivery of the Climate Change Action Plan.

12.2 Site allocations have taken account of wildlife site designations in order to avoid the Borough's most valuable biodiverse areas. The Local Plan also includes development management policies for the protection of the natural environment, including national and local wildlife sites, protected species and the requirement for 20% biodiversity net gains on new developments.

13. Equalities and Human Rights

13.1 The Pre-Submission Local Plan is accompanied by an Equalities Impact Assessment which assesses the impacts of Local Plan policies on equality and inclusion. Overall, the Local Plan is assessed to have positive impacts. Where negative impacts have been identified they are subject to appropriate mitigation.

14. Risk Management

14.1 The Local Development Scheme identifies the risks to meeting the Local Plan milestones and sets out some mitigation to each risk. Of note is that the Local Plan does not include sufficient Gypsy and Traveller sites to meet the needs identified in the technical background evidence, so the Council is reliant on alternative approaches. To continue to prepare the Local Plan under transitional arrangements will result in strategic policies covering less than the 15 year period at Plan adoption recommended in national policy, but this is weighed against the more compelling need to progress an up-to-date Local Plan to adoption. It is recognised that the timetable for Examination and the receipt of the Inspectors Report prior to the adoption of the Plan in Autumn 2025 will be challenging.

14.2 The Government is also proposing planning reforms through implementation of the Levelling Up and Regeneration Act. This requires secondary legislation and at this time the detail and exact timing of the reforms is not known and will need to be monitored as the plan progresses. The deadline for adoption of a Local Plan under the current legislative system is December 2026.

15. Community Engagement and Communications

15.1 The Local Plan will be subject to a period of 6 weeks publication, as set out in the Recommendation section in this report. This will be undertaken in line with relevant legislation and the Councils adopted Statement of Community Involvement.

16. Annexes

16.1 Annex 1 – Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19)

16.2 Annex 2 – Surrey Heath Local Plan: Pre- Submission Mapping Booklet

16.3 Annex 3 – Surrey Heath Local Plan: Policies Map

16.4 Annex 4a and 4b – Sustainability Appraisal and Non-Technical Summary [

16.5 Annex 5 – Summary of comments on Regulation 18 Local Plan

17. Background Papers

- 17.1 Background evidence that has been produced to support the Local Plan can be found on the Council's Local Plan evidence page at <https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>

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Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19) Version for Executive and Full Council



June 2024

Surrey Heath Borough Council
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Contents

Foreword.....	4
Introduction and Context.....	6
Introduction	6
Spatial Portrait.....	13
Section 1: Key Challenges, Vision and Objectives	20
Key Challenges	20
Vision for the Borough.....	21
Strategic Objectives.....	23
Key Diagram.....	25
Section 2: Spatial Strategy.....	26
Policy SS1: Spatial Strategy.....	26
Policy SS2: Presumption in Favour of Sustainable Development.....	36
Policy SS3a and SS3b: Climate Change Mitigation and Adaptation	37
Section 3: Housing.....	45
Policy HA1: Site Allocations.....	45
Policy HA2: London Road Block Site Allocation.....	63
Policy HA3: Land East of Knoll Road Site Allocation.....	69
Policy HA4: Mindenhurst, Deepcut Site Allocation.....	75
Policy H5: Range and Mix of Housing	78
Policy H6: Specialist Housing	83
Policy H7: Affordable Housing.....	87
Policy H8: Loss of Housing.....	92
Policy H9: Rural Exception Sites	94
Policy H10: First Homes Exception Sites.....	97
Policy H11: Gypsies and Travellers and Travelling Showpeople	100
Policy H12: Site Allocations for Gypsy and Travelling Showpeople Accommodation.....	107
Section 4: Town Centres, Retail and Economy.....	109
Policy CTC1: Camberley Town Centre.....	109
Policy CTC2: Camberley Town Centre Primary Shopping Area.....	115
Policy CTC3: Movement and Accessibility	118
Policy CTC4: Land East of Park Street, North of Princess Way	120
Economy.....	121
Policy ER1: Economic Growth and Investment.....	123
Policy ER2: Strategic Employment Sites.....	127
Policy ER3: Locally Important Employment Sites.....	129
Policy ER4: Yorktown and Watchmoor Business Parks.....	133
Policy ER5: Rural Economy.....	134
Policy ER6: Frimley Park Hospital.....	136
Policy ER7: Edge of Centre and Out of Centre Proposals	139
Policy ER8: District and Local Centres.....	142



Policy ER9: Neighbourhood Parades.....	145
Policy ER10: Old Dean	147
Section 5: Infrastructure	149
Policy IN1: Infrastructure Delivery.....	149
Policy IN2: Transportation	153
Policy IN3: Digital and Telecommunications Infrastructure.....	157
Policy IN4: Community Facilities	160
Policy IN5: Green Infrastructure	162
Policy IN6: Green Space.....	165
Policy IN7: Indoor and Built Sports and Recreational facilities.....	168
Section 6: Environment	170
Policy E1: Thames Basin Heaths Special Protection Area.....	170
Policy E2 Biodiversity and Geodiversity	173
Policy E3: Biodiversity Net Gain	177
Policy E4: Pollution and Contamination	180
Policy E5: Renewable and Low Carbon Energy and Heating Schemes	186
Policy E6: Flood Risk and Sustainable Drainage.....	188
Policy E7: Watercourses and water quality.....	195
Policy E8: Landscape Character.....	198
Section 7: Green Belt and Countryside	203
Policy GBC1: Development of new buildings within the Green Belt.....	203
Policy GBC2: Development of Existing Buildings within the Green Belt.....	208
Policy GBC3: Equestrian Uses in the Green Belt and Countryside Beyond the Green Belt..	211
Policy GBC4: Development within the Countryside Beyond the Green Belt.....	213
Policy GBC5: Gordon’s School, West End.....	216
Section 8: Design and Heritage	218
Policy DH1: Design Principles.....	218
Policy DH2: Making effective use of land	226
Policy DH3: Residential Space Standards.....	229
Policy DH4: Sustainable Water Use.....	230
Policy DH5: Trees and Landscaping	231
Policy DH6: Shopfronts, signage and advertisements	235
Policy DH7: Heritage Assets.....	237
Policy DH8: Building Emission Standards.....	246
Section 9: Surrey Heath Local Plan Monitoring and Implementation	249
Appendix 1: Glossary.....	270
Appendix 2: Housing Trajectory.....	289
Appendix 3: Strategic Policies for the Purpose of Neighbourhood Plans.....	290
Appendix 4: Development Plan Policies to be superseded by the Surrey Heath Local Plan (2019 – 2038).....	292



Foreword

Surrey Heath has long been recognised as one of the best places to live in the country, offering a fantastic environment and the opportunity for a great quality of life.

As a council, our vision is to protect what makes Surrey Heath special, while at the same time securing improvements in the opportunities for all of our residents and businesses. Our approach recognises that we are all custodians of our precious local environment and want Surrey Heath to be known for its exceptional green spaces and the high standards of its environmental practices.

Our new Local Plan reflects the feedback from extensive local consultation and engagement. It seeks to protect and enhance our valuable environmental and community assets and guide development in our borough up to 2038 so that our residents have the local homes, jobs and infrastructure they need.

Having an up-to-date Local Plan will provide greater control over the type and quality of development that takes place and where it is located in the Borough.

The Local Plan sets out planning policies and site allocations establishing the planning framework for the type and location of new homes, including more affordable and environmentally sustainable homes, the regeneration and redevelopment of employment sites, improvements in local infrastructure and the enhancement of our town, village and local centres.

This will be alongside the protection of our valuable Green Belt, countryside and important ecological and heritage assets, and ensuring that future development delivers positive improvements towards biodiversity net-gain, provides a high-quality of design and contributes directly to our target of becoming a net zero borough in terms of carbon emissions.

Inherent in our policies is the need to protect and enhance the important qualities of our individual communities across the borough recognising both the need for regeneration within Camberley town centre, and the valuable contribution that our villages and rural communities make to quality of life. We are passionate about the need to regenerate Camberley Town Centre and to build more quality affordable homes for local people, including our younger adult residents and those delivering essential services in our community who have struggled to find somewhere to live.

In addition, a Local Plan helps ensure the necessary infrastructure, such as transport improvements, are delivered to meet the needs arising from new development.

In response to the Government set target for delivery of new homes, the Local Plan supports the delivery of about 5,500 new homes in the Borough, many of which are already



under construction or already have planning permission. This will include a high proportion of much needed affordable homes for local people. The focus for new homes is in Camberley town centre and in the west of the borough, with continued support for the redevelopment of the surplus Ministry of Defence land at Deepcut providing 1,200 new homes at Mindenhurst.

This publication of the Local Plan will be available from 9 July until 20 August 2024 for you to provide any comments which we welcome. These representations on matters of soundness of the plan and legal compliance will then be considered by an Independent Examiner on behalf of the Planning Inspectorate who will consider any modifications that should be made to the Plan before it can be adopted.

I'd like to thank all those that took part in our Draft Local Plan consultations during 2022 (Regulation 18) and for the positive response this received. These have helped to inform this updated pre-submission version of the Local Plan (Regulation 19).

Finally, I would also like to thank the Chair and all of the Members of the cross-party Local Plan Working Group for the time and commitment they have put into the preparation of this Local Plan.

Please take the time to read the Local Plan as it impacts your local area in the Borough and give us your comments to pass on to the Independent Examiner.

Take care



Surrey Heath Borough Council Leader Cllr Shaun Macdonald

Councillor Shaun Macdonald

Leader of the Council



Introduction and Context

Introduction

- I.1. The Surrey Heath Local Plan will guide the location, scale and type of future development in the Borough up to 2038. The Plan will support the provision of new homes and appropriate infrastructure, the protection of employment sites and the vitality of our town, district and local centres. Policies in the Local Plan will also protect those aspects of the Borough which are valued by local people and contribute to its character, including the Green Belt, open spaces and heritage assets.
- I.2. Having an up-to-date Local Plan means that the Council is better able to influence the type, location and scale of new development and resist inappropriate development. The new Local Plan replaces policies contained in the Camberley Town Centre Area Action Plan, 2014, the Core Strategy and Development Management Policies 2012, and saved policies from the 2000 Surrey Heath Local Plan.
- I.3. Planning Regulations state that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Once adopted, the policies within the Surrey Heath Local Plan, together with any made neighbourhood plans, and any Waste and Minerals Local Plans prepared by Surrey County Council, will be the framework against which any planning applications in the Borough will be assessed.

Local Plan timetable

- I.4. The timetable for preparing the Local Plan is set out below and can be found in more detail on [Surrey Heath Borough Council's website](#).

Table 1 – Local Plan timetable

Stage	Dates
Draft Local Plan Consultation (Regulation 18) Interim Sustainability Appraisal Consultation	14 March to 9 May 2022 and 8 th August – 19 th September 2022
Pre-Submission Consultation on the Local Plan (Regulation 19) Consultation on the Sustainability Appraisal	9 th July – 20 th August 2024
Submission of the Plan and supporting evidence to the Secretary of State for Examination	Winter 2024/2025
Local Plan Examination (Hearing sessions)	Spring 2025



Stage	Dates
Local Plan Adoption	Autumn 2025

Further Information:

More information is available on [Surrey Heath Borough Council's website](#).

Please contact a member of the Planning Policy team at planning.consultation@surreyheath.gov.uk, or call our Contact Centre on **01276 707100** if you have any queries regarding this Pre-Submission Local Plan publication.

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Local Plan Context

- 1.5. In preparing the Local Plan, the Council has to have regard to national, regional and local policies, plans and strategies as well as relevant legislation, including the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the Town and Country (Local Planning) Regulations 2012. Policies and allocations must also reflect the local evidence base that is prepared to support the Plan. Where appropriate, links to relevant evidence base studies and other policies and strategies are provided within this document. The evidence base can be viewed at Surrey Heath's [Planning Policy webpage](#) and in hard copy at the Council offices at Knoll Road, Camberley during normal office hours. In addition to technical evidence on issues such as climate change, flooding, housing and employment, the evidence base also includes a number of Topic Papers which the Council has prepared, setting out further background to the Local Plan policies and allocations.

Previous Local Plan Consultations

- 1.6. The Council has undertaken a number of consultations to inform the Local Plan. In June/July 2018 the Council consulted on a Draft Local Plan Issues and Options/Preferred Options document. That draft Plan covered the period up to 2032 and sought views on a range of Policy approaches and allocations. In March to May 2022 extensive consultation was undertaken on a draft Surrey Heath Local Plan which set out detailed planning policies and site allocations for comment and which extended the Plan period to 2038.

- 1.7. Consultation included:

- Direct email and postal notifications including over 1,300 emails;
- Dedicated section of the Council's website including a 'Quick comments' webpage;
- Dedicated consultation portal providing access to the consultation documents and submission of comments;
- Extensive publication on social media including Facebook, Twitter, NextDoor, Instagram and LinkedIn;
- Hard copies at libraries and Parish Council's;
- Press release and article in Spring 2022 edition of Heathscene;
- Two public Exhibitions (Camberley Town Centre and Lightwater Leisure Centre);
- Two drop in events (Chobham Pavilion and Deepcut Village Centre);
- Three online webinars;
- Parish Council briefing.



- I.8. A further consultation on additional site allocations for Gypsies and Travellers and Travelling Showpeople was undertaken in August to September 2022. This also included direct emails, press releases and an article in Heathscene, social media posts, three drop-in events, a webinar and 'drop-in' sessions. A summary of the key issues raised in representations received to these consultations can be found in the Council's Consultation Statement published alongside the Local Plan.

National Planning Policy and Guidance

- I.9. Government planning policy is set out in the [National Planning Policy Framework](#) (NPPF) 2023, and Planning Policy for Traveller Sites (2015, and updated annex 2023). The NPPF sets out national planning policy on topics such as housing and employment needs, town centres, the natural and historic environments and on development within the Green Belt. The NPPF sets out a presumption in favour of sustainable development and local planning authorities are expected to plan positively for the needs of their area. The local plan must be in conformity with policies in the NPPF and this is tested by an Inspector during the Local Plan Examination.
- I.10. The NPPF is supported by on-line [National Planning Practice Guidance](#) (NPPG) which details out more fully how the government expects national planning policy to be implemented.

Saved Regional Guidance

- I.11. The South East Plan set out regional policies for the South East of England. In March 2013 policies in the South East Plan were revoked by Government with the exception of Policy NRM6 which relates to the Thames Basin Heaths Special Protection Area (SPA). The Thames Basin Heaths cover most of the heathland areas within the Borough and the whole of Surrey Heath is within 5km of the SPA.

County-wide Plans and Strategies

- I.12. Surrey Heath Borough lies in a two-tier authority area and Surrey County Council therefore delivers many of the services which support our communities. These include the provision of school places as Local Education Authority and matters of highway safety and improvement measures in its role as Highway Authority. 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.



- I.13. As a result of Government changes to cease providing funding to Local Enterprise Partnerships (LEPs) from April 2024, the functions previously held by LEPs will transfer to Upper Tier Local Authorities. For Surrey Heath this means that most economic growth functions previously delivered by the Enterprise M3 LEP will transfer to Surrey County Council and delivery of economic activity will be undertaken across Surrey County.
- I.14. The Surrey Heath Local Plan will support and help to deliver plans and strategies relating to the services delivered by the County Council. These include the Surrey Local Transport Plan 4 (2022 - 2032), the Surrey Local Nature Recovery Strategy and the School Organisation Plan 2022 – 2032 and any replacements. In determining planning applications other Surrey County Council adopted policies and guidance will also be relevant such as the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development and the Healthy Streets for Surrey Design Code.

Surrey Heath Plans and Strategies

- I.15. The Local Plan should also support the delivery of other plans and strategies produced by the Borough Council. These include the– [Council Strategy 2024 - 2028](#) which sets out the following priorities:
1. Protect our Environment
 2. Promote Healthier and More Inclusive Communities
 3. Support a Strong Economy and Create More Homes
 4. Campaign for Residents
 5. Deliver Effective Services with Sustainable Finances
- I.16. Preparing the Local Plan is identified in the Council Strategy as one of the key elements to delivering Priority 3. Local Plan policies will also play a significant role in delivering a number of the Priorities. This will be, for example, through the protection and enhancement of green spaces and biodiversity, policies and allocations relating to the delivery of new homes and to affordable housing and the requirement for appropriate infrastructure alongside new development. Other Borough wide plans and strategies relevant to the Local Plan include the Surrey Heath [Economic Development Strategy](#) 2023, the Surrey Heath Borough [Annual Plan](#) and the annual [Infrastructure Funding Statement](#).
- I.17. In preparing the new Local Plan, consideration was also given to which policies from the existing Local Plan in the Core Strategy and Development Management Policies 2011 – 2028 and the Camberley Town Centre Area Action Plan 2011 – 2028 should be carried forward, reviewed or replaced.



Neighbourhood Plans

- I.18. Parish Councils or Neighbourhood Forums have the ability to create neighbourhood plans to create a local vision and planning policies for a designated Neighbourhood Area. Once adopted, neighbourhood plans form part of the statutory development plan and are a material consideration in the determination of planning applications. Windlesham Neighbourhood Plan was formally 'made' part of the Surrey Heath Development Plan in June 2019 and other neighbourhood plans are in preparation. Neighbourhood plans can provide an additional level of local planning policy but must be in general conformity with the strategic policies in the Local Plan once these are adopted. Appendix 3 provides a list of the strategic policies for the purposes of preparing neighbourhood plans.

Cross-Boundary Working

- I.19. The Council is required to work with other local authorities and organisations on strategic cross boundary planning issues under a legal 'duty to co-operate'. These issues include those related to housing, employment, transport and the Thames Basin Heaths Special Protection Area.
- I.20. At the time of preparation of the Hart and Rushmoor Local Plans the three authorities were identified as forming part of a Housing Market Area. The Rushmoor Local Plan 2014 – 2032 was adopted in February 2019 and the Hart Local Plan 2014 – 2032 in April 2020. Specific discussions on meeting unmet housing needs have been undertaken with Hart District Council as set out in more detail in the supporting text to Policy SS1: The Spatial Strategy. Liaison with all neighbouring authorities has also been undertaken on housing matters and other strategic cross boundary issues.
- I.21. The duty to co-operate is an ongoing process and engagement with relevant duty to co-operate bodies has informed the Plan. The Council has produced a Duty to Co-operate Compliance Statement alongside the Local Plan which sets out the duty to co-operate engagement and outcomes to date. Statements of Common Ground relating to cross boundary issues have also been prepared with some key duty to co-operate partners and can be viewed on the Local Plan evidence webpage.

Sustainability Appraisal

- I.22. The Strategy and policies in the Local Plan must contribute to the delivery of sustainable development. This is assessed by undertaking a Sustainability Appraisal (SA). Reasonable alternative policy options (where they exist) have been tested against a set of social, environmental and economic objectives. An Interim SA was prepared to support the Draft Local Plan (2022), and a Final SA has been prepared alongside this version of the Local Plan.



Habitat Regulation Assessment

- I.23. The purpose of the Habitat Regulation Assessment (HRA) is to identify any areas of the Local Plan that have the potential to cause any likely significant effect on Natura 2000 or European Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPA) and Ramsar Sites), either in isolation or in combination with other plans or projects. This includes the effects of air quality. Where such effects are identified mitigation strategies will need to be devised. The whole of Surrey Heath is within 5km of the Thames Basin Heaths Special Protection Area (SPA) and therefore the Local Plan needs to be subject to HRA.
- I.24. A Habitats Regulation Assessment has been prepared in consultation with Natural England to support the Local Plan. This includes an air quality assessment. The HRA concludes that there will be no adverse effects of the Plan on the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC regarding recreational pressure, both alone and in combination. No additional policy recommendations are made for inclusion in the Plan.

Climate Change

- I.25. The Council has a statutory duty to ensure that its policies contribute to tackling climate change.
- I.26. In May 2019, the Government declared a climate change emergency and in June of that year the Climate Change Act was amended to set a new emissions target for the UK of net zero greenhouse gases by 2050. In October 2019, Surrey Heath Borough Council declared a Climate Change emergency and an Ecological Emergency, and committed to become carbon neutral across its own estate and operations by 2030 and contribute to making the Borough net zero by 2050 (with the aspiration for net zero by 2030), subsequently adopting a Climate Change Action Plan. To ensure that the Local Plan policies take proper account of climate change, the Council commissioned a Climate Change Study to inform the Plan. This can be viewed in the Local Plan evidence base.

Health

- I.27. The built and natural environment can have a significant influence on health and wellbeing. The design and location of new development can influence physical activity levels, travel patterns, social connectivity, and mental and physical health. Good health is also linked to quality of housing and opportunities for employment as well as access to leisure, culture and green spaces.



- I.28. Policies in this Plan will collectively contribute to improving health and wellbeing. This includes the requirement for a Health Impact Assessment for certain developments; ensuring there is an appropriate supply of employment land and premises to meet future employment needs; ensuring a continuing supply of housing to meet future local needs; protection and enhancement of green infrastructure; encouraging the use of sustainable travel modes as well as minimising pollution. Policies also ensure the delivery of appropriate infrastructure (including health) alongside new development and the Plan has a specific Policy supporting Frimley Park Hospital.

Monitoring and Review

- I.29. In order to assess whether the Local Plan is delivering the Vision and Objectives set out later in this Plan, section 9 sets out a monitoring framework which will be reported through the annual Authorities Monitoring Report. This will include monitoring the delivery of new homes and amount of employment and retail floorspace.
- I.30. The Council is required to undertake a review of the Local Plan every five years from adoption. Section 9 of this Plan also sets out the circumstances whereby a review may be needed earlier than this because of other factors, such as significant changes to national policy or where targets in the Local Plan are not being met, such as the number of new homes being built.

Spatial Portrait

About Surrey Heath Borough

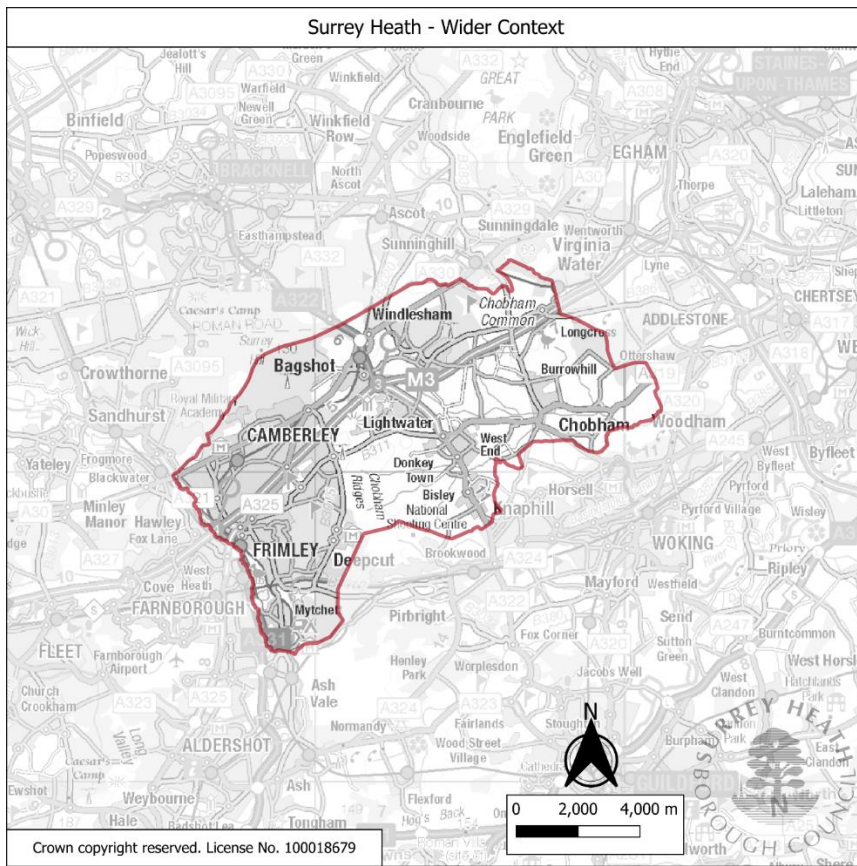
- I.31. Surrey Heath lies in the north west corner of Surrey and adjoins the counties of Berkshire and Hampshire. The north and east of the Borough are mainly areas of countryside and heathland which give the Borough its name. In total, the Borough covers an area of some 9,507 hectares and according to the Office for National Statistics, has a population of 90,500. Nearly half of the Borough is designated as Green Belt.
- I.32. The western half of the Borough contains the majority of housing in the Borough and is mainly urban in character. It comprises Camberley and Frimley linked to the villages of Bagshot, Frimley Green, Mytchett and Deepcut. The eastern half of the Borough is mostly countryside of which a significant proportion is Green Belt. It includes the larger villages of Bisley, Lightwater, West End and Windlesham, (including Snows Ride) and the smaller village of Chobham.



- I.33. Surrey Heath lies within the Blackwater Valley, comprising authorities from parts of Berkshire, Hampshire, and Surrey based along the A331 Blackwater Valley Road and River Blackwater. There are important economic and functional relationships between the main urban settlements which together form the Blackwater Valley area and Camberley forms one of the largest towns in the Valley. Figure I shows the location of Surrey Heath in the wider geographical context, including the towns of Bracknell, Farnborough, Guildford and Woking.



Figure 1 – Surrey Heath in its Wider Context



- I.34. The demographic and socio-economic profile of the Borough is characterised by an ageing population. This presents future challenges for housing, health, employment and social support.
- I.35. The 2021 Census indicates that from 2011 to 2021, the population in Surrey Heath grew by 5% compared to England’s 6.6%, and the South East’s 7.5%. In addition, the number of households in Surrey Heath has increased by 5.7%. Surrey Heath is an ageing Borough, seeing a 34% increase in residents aged 70 to 74 years. Over this period there has been an - 8% decline in children aged 4 years and under in Surrey Heath, compared to a decrease of - 7.3% across England. The Local Housing Needs Assessment 2024 projects a population growth of 11.8% from 2021 to 2038 (adjusted from 2040 at 13.2%), and an increase in total households by 17% (adjusted from 2040 at 19%). Surrey Heath is set to continue to age, where it is expected that by 2040 there will be a 45.6% increase in residents aged between 75 and 84, and a 77.1% increase in residents aged 85 and over. This is compared to a 6% increase in residents aged under 65. The Census also identified a decrease of 0.9% in children under 15 years compared to an England increase of 5%.



- I.36. Surrey Heath is an expensive place to live with house prices and rental costs higher than the South East and national averages, although lower than the averages for Surrey. In addition, the Local Housing Needs Assessment 2024 identifies a disproportionately high number of detached dwellings at 43.7% in Surrey Heath compared to the Surrey average of 32.2% and national average of 22.9%. Affordability worsened in Surrey Heath between 1997 and 2022, currently having an affordability ratio of 11.58. According to Nomis, a higher proportion of the working age population are economically active than the South East and England and although unemployment increased during the Covid-19 pandemic, levels are lower than the South East and Great Britain.
- I.37. In the English Indices of Multiple Deprivation 2019, Surrey Heath is ranked as 9th least deprived local authority (ranked at 309 of 317). However, this masks pockets of much higher levels of relative deprivation across the Borough particularly but not solely, relating to the Education, Skills and Training indicator. Overall, Surrey Heath is an affluent area with good health outcomes and relatively low rates of many conditions and unhealthy behaviours. The average life expectancy at birth for both men and women in Surrey Heath (82.2 and 84.8 years respectively) is similar to the Surrey average (81.8 and 85.0 years respectively). However, this masks some inequalities within the Borough with some groups/smaller areas having significantly greater needs or worse outcomes.
- I.38. There are a range of formal and informal open spaces and playing pitches across the Borough and there are two country parks in Frimley Green and Lightwater. The Borough also contains a number of new or improved areas of open space providing mitigation for the impact of new development on the Thames Basin Heaths Special Protection Area. Known as Suitable Alternative Natural Greenspaces (SANG), these include Chobham Water Meadows and Windlemere SANG.
- I.39. Surrey Heath's economic strength arises from a diverse economic base, with businesses ranging from international organisations to small and medium sized local enterprises. Surrey Heath contains several high profile businesses and corporations across a broad range of sectors including: UCB and Gordon Murray Automotive. Frimley Park Hospital, which is rated 'outstanding', is the Borough's largest employer. The Sandhurst Royal Military Academy is also partly located within the Borough.
- I.40. The majority of employment floorspace is located in Camberley and Frimley at three large business parks and five industrial estates that make a significant contribution to the employment land supply. In line with County trends, there has been a decline in office floorspace in the Borough in the last 15 years and fluctuating levels of industrial floorspace. Much of the losses of office floorspace are due to the conversion of offices to residential uses through permitted development rights



- I.41. The main retail centre in the Borough is Camberley, which provides shopping, business, leisure, cultural and community activities. Collectively Camberley is an active Business Improvement District (BID) which works to promote the town centre to residents, shoppers, businesses and visitors. The Council has identified the regeneration of Camberley town centre as a priority and has pro-actively delivered a number of improvements including the acquisition and improvement of town centre property such as The Square Shopping Centre, and significant public realm improvements.
- I.42. The redevelopment of the London Road Block remains the single biggest regeneration opportunity in the town centre. The intention is to create an attractive gateway to Camberley town centre, with new frontages to London Road (A30) and high quality streets and spaces that link the block with the High Street and Park Street.
- I.43. Bagshot and Frimley are identified as District Centres providing a wide range of services and having a number of independent retailers. There are also a number of Local Centres and Neighbourhood parades in the Borough.
- I.44. Access to public transport varies across the Borough with Camberley, Frimley and Bagshot having access to a variety of transport opportunities (rail, bus, and cycling), while other areas of the Borough have limited or no access to alternatives other than the car. 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 limited direct access to London Waterloo. Many commuters living in Surrey Heath therefore use nearby faster services from stations outside the Borough at Farnborough, Woking and Sunningdale.
- I.45. The main library in the Borough is Camberley Library, which provides a full range of services. Libraries at Bagshot, Frimley Green and Lightwater are smaller and have limited opening hours. Camberley Theatre provides a local venue for Arts, Film, Drama and Conference facilities. The Surrey Heath Museum is in Camberley, the Royal Logistics Corps Museum is at Deepcut and there is a small local museum in Chobham. In addition, the Surrey Heath Archaeological and Heritage Trust are based in Bagshot and the Basingstoke Canal Visitor Centre is at Mytchett.
- I.46. There are a number of village and community halls across the Borough, with improvements to community facilities to be funded as part of the Mindenhurst development. These contribute to the sustainability of local communities and support local activities and events.



- I.47. The Borough is well connected by road to a number of strategic transport routes linking to London and the south coast. The M3 motorway stretching from London to Southampton crosses through the Borough from east to west and abuts the settlements of Camberley, Frimley, Bagshot and Lightwater. Other major highways that run through the Borough include the A331 Blackwater Valley Relief Road, which runs north to south along the western boundary and the A322, which connects junction 3 of the M3 with the towns of Bracknell to the North and Guildford to the South. The A30 runs east to west through the Borough and connects the Blackwater Valley with London and the South West of England.
- I.48. Based on the 2021 Census, Surrey Heath has one of the highest rates of car ownership in England and Wales with 90% of households having access to owning a car or van, higher than the rest of Surrey. High levels of car ownership reflect the prosperity of the area, but also the historically poor public transport facilities.
- I.49. In 2019, the Borough Council declared a Climate Change Emergency setting out the intention to become carbon neutral across its own estate and operations by 2030. Like the rest of the UK the likely implications of climate change in the Borough will include higher average temperatures, particularly in summer and winter, changes in seasonal rainfall patterns, along with more intense periods of rainfall and the likelihood of more very hot days and heatwaves. The [Climate Change Study \(2020\)](#) showed that the total carbon emissions for the Borough in 2017 was 417,346 tCO₂e. The greatest contributor to this was domestic energy use, accounting for 41% of emissions, with road transport the next greatest contributor (33%).
- I.50. Surrey Heath benefits from a rich and varied landscape and has a range of designated sites important for their biodiversity value and which contribute to the character of the Borough. The heathland areas in the Borough are nationally designated Special Protection Areas (SPA) and/or Special Areas of Conservation (SAC) which are also Sites of Special Scientific Interest (SSSI), and a designated National Nature Reserve at Chobham Common. The heathland habitat is home to three protected species of ground nesting bird namely Woodlark, Nightjar and Dartford Warbler. The Basingstoke Canal is also a Site of Special Scientific Interest. These areas take up approximately 23% of land in Surrey Heath. There are also numerous locally designated Sites of Nature Conservation Importance (SNCI) and one designated Local Nature Reserve (LNR).



- I.51. Surrey Heath being identified by the Bluesky National Tree Map as having the highest density of tree cover in England and Wales in 2014, and being identified by Friends of the Earth in 2023 data as ranking first in having the highest tree canopy cover at 36.1%. Data in 2019 from the Office of National Statistics (ONS) suggests that 31% of Surrey Heath is covered by woodland. Agricultural land makes up 26% of Surrey Heath. The agricultural land classification identifies the best and most versatile (BMV) agricultural land as classes 1, 2 or 3a. Surrey Heath does not have any class 1 or 2 BMV and only 10% of agricultural land is classified as BMV 3.
- I.52. More than half of the countryside within Surrey Heath is designated as part of the Metropolitan Green Belt. Whether falling within the Green Belt or beyond it, the countryside within Surrey Heath performs a number of roles: it ensures that settlements remain separate and distinct, provides for biodiversity and ecosystems services, offers opportunities for leisure and it accommodates a number of military uses, including army barracks, ranges, training areas, and test tracks.
- I.53. Fluvial flood risk is largely from the Main Rivers including the Blackwater and tributaries and the Addlestone Bourne. The River Bourne catchment has large areas at risk, however much of this is rural undeveloped land. Most of the Borough is at low risk of groundwater flooding due to the underlying sandstone geology, with a higher risk close to river valleys.
- I.54. Surrey Heath Borough's historic environment contributes to the Borough's character, sense of place and quality of life. There are over 180 statutory Listed Buildings or structures in Surrey Heath including one Grade I building. Bagshot Park and Frimley Park are Grade II listed Parks and Gardens. There are nine Conservation Areas in the Borough, about 200 locally Listed Buildings and structures and 25 areas of High Archaeological Potential.



Section I: Key Challenges, Vision and Objectives

Key Challenges

- I.55. There are a number of challenges facing the Borough that will influence the development of planning policies and site allocations. Some of these key challenges are set out below. Alongside this, the long term effects of how people will change their work, living, shopping and travel patterns as a result of the Covid-19 pandemic are not yet known and may influence future social and economic trends.
- I.56. An overriding challenge is to deliver the additional development and infrastructure that will support and benefit the changing population without compromising the quality of life of existing residents or cause harm to the environment.
- I.57. Existing infrastructure is in some areas already at capacity. The preparation and implementation of the Local Plan must ensure that development which takes place is supported by the necessary physical, social and community infrastructure. This will mean cross boundary working in some instances and working with partners including Surrey County Council to ensure funding and delivery.
- I.58. In delivering housing to meet future needs, a key challenge is to determine how much of this need can be met within the Borough, having regard to land availability, as well as environmental and policy constraints. In particular, the Thames Basin Heaths SPA as well as other designated national and local sites of nature importance and the Metropolitan Green Belt impact upon options for housing delivery.
- I.59. Providing a range of housing which helps meet the needs of all the Borough's residents needs to be addressed through the provision of an appropriate mix of housing. In particular, the Borough has high house prices and there is a need to ensure the availability of affordable housing, as well as meeting the needs of an ageing population.
- I.60. To ensure the ongoing economic success of the Borough the challenge will be not only to retain appropriate existing employment land but to provide the planning framework for opportunities for new businesses to locate into the Borough. The important role of rural businesses needs to be recognised, protected and enhanced.



- I.61. The Council is taking a pro-active approach to ensuring the delivery of a regenerated Camberley town centre and this ambition should be reflected in policies and allocations in the Local Plan. The Local Plan needs to set a framework that recognises the changing role of town centres and the changes to the way in which people shop and work. The Local Plan will also need to ensure that the Borough's District Centres of Bagshot and Frimley can continue to operate successfully by developing policies to ensure their viability and vibrancy.
- I.62. In meeting future needs, there is a need to ensure that development within the Green Belt and Countryside beyond the Green Belt does not have a detrimental impact on the openness and purposes of the Green Belt and on the character of Countryside beyond the Green Belt.
- I.63. Another key challenge is to ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.
- I.64. Local Plan policies and allocations will need to ensure that the character of towns and villages in the Borough is protected whilst allowing the necessary development to take place. Much of the character is derived from non-listed but locally important buildings and structures which are at risk of being lost through redevelopment or alteration. As such, the Borough needs to ensure that new development makes the most efficient use of land and buildings, but at the same time protects and enhances its designated and undesignated heritage assets and the quality and character of the built environment.

Vision for the Borough

- I.65. The Council, through the Local Plan process, is seeking to deliver vibrant communities with a distinct identity in keeping with the character of their surroundings, and which enhance the local landscape and biodiversity. Development must take place in the right place and make a positive contribution to people's lives, including their health and wellbeing, through the provision of homes and jobs alongside social and leisure opportunities, whilst protecting and enhancing the natural and historic environment. The vision for the Borough is set out below:



By 2038 Surrey Heath will have maintained a high quality of life and retained its distinct identity of towns and villages whilst taking the growth identified in the Local Plan. In delivering growth, the natural environment assets including important heathland and Sites of Special Scientific Interest along with wider, green infrastructure, will have been protected and enhanced, and an overall net gain in biodiversity will have been delivered. New development will reflect the distinctive character of the Borough's towns and villages. Local identity will be supported through conserving and enhancing the Borough's historic assets including those that contribute to its Victorian and Edwardian background and its military heritage. New housing will reflect local needs, including those of specialist groups. Development will be of high quality, improve community cohesion, and will have been designed to meet the challenges of climate change, minimising carbon dioxide emissions and taken opportunities for providing renewable and low carbon energy schemes.

Camberley town centre will be renowned for its unique and independent feel. A modern, vibrant, accessible and connected place. Offering excellent service through independent shopping, dining and top-class leisure facilities, and the location of choice in the region to meet up socially with family and friends.

Entrepreneurial spirit and a growing and active residential community will be supported by high-quality green space and public realm, a strong cultural and public service offer, great digital connectivity, an unrivalled quality of life underpinned by a strong sense of community.

The Borough's District Centres at Frimley and Bagshot will continue to thrive, playing an important role as centres for local services, retail and employment. Local centres and neighbourhood parades continue to fulfil an important role for local communities, and development, and other partnership working in these will have improved their character and design.

The Borough will have a thriving economy performing to its full economic potential as a leading centre in Northwest Surrey and the wider Blackwater Valley. The diverse range of employment provision will support the employment needs of the Functional Economic Area of Hart, Rushmoor and Surrey Heath and wider geographic growth ambitions. The important role of the rural economy will have been supported.

New development will support other investment programmes to prioritise more sustainable and active forms of travel alongside schemes to tackle issues of congestion, including on the A30 and around Camberley town. Partnership working will have improved rail travel opportunities and enhanced digital infrastructure.



Strategic Objectives

- I.66. The following Objectives set out (in no order of priority) the link between the Vision and the Policies set out in this Local Plan.

Table 2 – Strategic Objectives

Objective	Strategic Objective
Objective A	To 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.
Objective B	To 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.
Objective C	To enhance the vitality and viability of Camberley Town Centre and the other District and Local centres within the Borough.
Objective D	To 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.
Objective E	To 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.
Objective F	To ensure that new development minimises or mitigates the impact of development on air quality, noise, light pollution, odours, emissions and particulates.

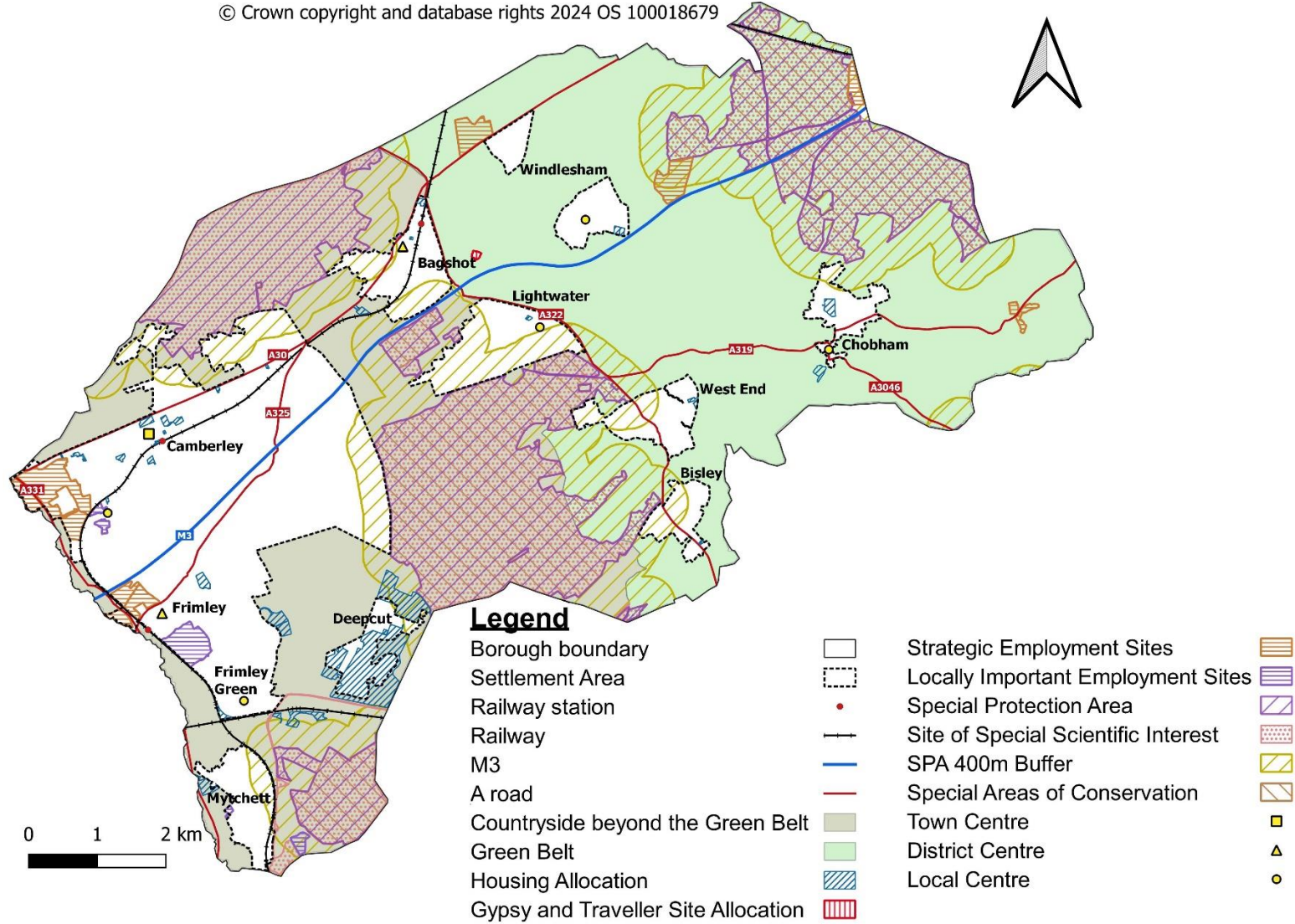


Objective	Strategic Objective
Objective G	To ensure that new development, unless appropriate development under the Exceptions Test, is not located in areas of high or medium risk of flooding and that development does not increase surface water run-off.
Objective H	To deliver action on climate change 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 to the impacts of climate change.
Objective I	To protect the character and purpose of the Green Belt and the character of the Countryside beyond the Green Belt.
Objective J	To conserve and enhance the Borough's built environment and heritage assets, both designated and non-designated.
Objective K	To promote healthy, sustainable, and cohesive local communities through good design, and access to homes, employment, community and recreational facilities.
Objective L	To support measures that prioritise active and sustainable travel modes including improved facilities for pedestrians and cyclists and improvements to public transport.



Key Diagram

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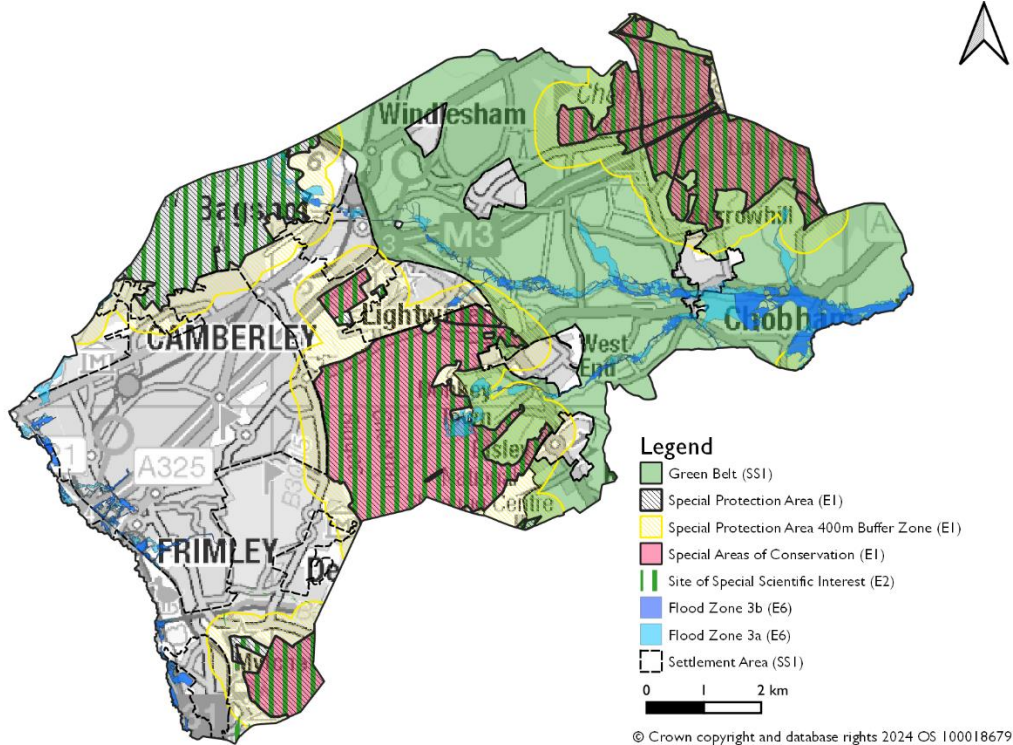


Section 2: Spatial Strategy

Policy SSI: Spatial Strategy

- 2.1. The Spatial Strategy sets out the overall level and distribution of growth in Surrey Heath and supports the delivery of sustainable development within the Borough. The significant areas of environmental constraints within the Borough impact on the ability to accommodate new development and the Spatial Strategy.
- 2.2. The Thames Basin Heath Special Protection Area (SPA) covers 23% of the Borough area with a further 19% in the 400m exclusion zone around the SPA, where no net new residential development is permissible due to it giving rise to adverse impacts on the integrity of the Thames Basin Heath SPA. These restrictions, covering 42% of the Borough, impact significantly upon the Borough’s ability to sustainably accommodate new development. Furthermore, approximately half the Borough is designated Green Belt.

Figure 2 – Constraints Map



- 2.3. The strategy is to focus new development within the settlement areas to the West of the Borough, to optimise delivery in the most sustainable and accessible areas. A significant element of the strategy is to support high quality and high density development within Camberley Town Centre, in order to support regeneration and the future vitality and viability of the town centre.
- 2.4. The East of the Borough comprises the villages set within the rural area, which is subject to significant areas of environmental constraints and Green Belt.

New homes

- 2.5. The delivery of new homes forms a key element of the Spatial Strategy. The National Planning Policy Framework (NPPF) suggests that local plans use the Government's standard method for calculating local housing needs, as set out in national Planning Practice Guidance, as the advisory starting point for calculating Local Housing Need, unless exceptional circumstances justify an alternative approach. The Local Housing Need calculation for Surrey Heath is set out in the [Strategic Land Availability Assessment \(2023\)](#) (the SLAA). The Local Housing Need figure for Surrey Heath is 321 homes per year. Over the plan period (2019 – 2038), this totals 6,111 new homes.
- 2.6. Surrey Heath, Hart and Rushmoor councils have a long-standing track record of joint working on plan making matters. At the time of preparing the Hart and Rushmoor Local Plans, the three authorities were working together as a Housing Market Area with a joint Strategic Housing Market Assessment, supported by the NPPF which was in place at that time.
- 2.7. It was in that earlier context that through the duty-to-cooperate and the Hart Local Plan Examination, Hart District Council agreed to accommodate 41 dwellings per annum of unmet need arising in Surrey Heath to 2032. This commitment is set out in Policy SS1 'Spatial Strategy and Distribution of Growth' in the adopted Hart Local Plan (Strategy and Sites) 2032. The Surrey Heath and Hart District Local Plans overlap for a period of 13 years, from 2019 – 2032, which at 41 dwellings per annum provides for a total of 533 homes to be delivered in Hart to meet Surrey Heath's unmet housing need. Hart District has confirmed this commitment through duty-to-cooperate discussions.
- 2.8. Accordingly, Surrey Heath's Local Housing Need figure is adjusted by subtracting 41 dwellings per annum up to 2032 (533 homes in total). Surrey Heath's housing requirement over the plan period therefore becomes 5,578 homes.



- 2.9. The Spatial Strategy therefore takes account of environmental and planning constraints in the Borough, the standard methodology Local Housing Need figure of 6,111 homes, the Housing Need Study 2023, the Countryside Capacity Study, the Strategic Land Availability Assessment, and supply in Hart District to meet unmet housing needs, to determine a housing requirement figure of 5,578 new homes for the Local Plan, over the plan period 2019-2038.
- 2.10. The Local Housing Needs Assessment (2024) (LHNA) provides a more detailed assessment of local housing need in terms of the housing mix and need for affordable homes. The study sets out the standard methodology figure and outlines that this broadly aligns with the population projection associated with economic forecasts for the Borough.
- 2.11. It is challenging to accommodate the level of housing growth derived from the standard methodology within the Borough and a proactive approach to identifying opportunities for development in suitable locations has been undertaken. A robust SLAA has been prepared, based on calls for sites and targeted correspondence with landowners and provides detailed evidence on the supply of deliverable and developable sites.
- 2.12. To date, 1,501 new homes have been delivered during the period 2019 to 2023. Existing planning permissions that are yet to be completed, as at 31 March 2023, comprise a further 1,990 new homes (incorporating a 4% lapse-rate applied to non-commenced sites). Together, these provide for 3,491 new homes. Consequently, the Council is required to find further capacity for an additional 2,087 new homes to meet the Local Housing Need throughout the Local Plan period up to 2038 of 5,578 homes. Table 3 below sets out the sources of supply that provide the Council's Local Housing Need up to 2038 (when adjusted for unmet need being delivered in Hart).

Table 3 – Housing Supply: number of dwellings (net) per delivery period

Source	Completed	1-5 years	6-10 years	11-15 years	Total
Completions	1,501	-	-	-	1,501
Outstanding capacity (Sites with detailed permission, commenced sites, and outline permissions up to 31 st March 2023)	-	1,717	317	0	2,034
Permission lapse rate	-	-32	-12	-	-44
Allocated Sites	-	208	968	727	1,903



Source	Completed	1-5 years	6-10 years	11-15 years	Total
Non-Allocated SLAA Sites	-	21	85	31	137
Windfall Sites	-	111	185	185	481
Total	1,501	2,025	1543	943	6,012

- 2.13. Further detail is set out in the [Strategic Land Availability Assessment \(2023\)](#) and [Housing Supply Topic Paper](#), which set out the sources of supply to ensure delivery of the housing requirement over the Local Plan period (2019 – 2038).
- 2.14. The Spatial Strategy directs the delivery of a significant number of new homes to Camberley Town Centre. In total, approximately 1,548 new homes are allocated within Camberley Town Centre, which will support its continued vitality and viability and form part of the Council's broader regeneration plans.
- 2.15. The Council has developed a Strategic Vision for Camberley Town Centre, which will be used to inform future masterplanning. The Spatial Strategy, includes delivery of approximately 864 (net) new homes on two key strategic town centre sites that are owned by the Borough Council, including:
1. approximately 340 gross new homes on the Land East of Knoll Road site (SLAA ID: 27), and
 2. approximately 550 (gross) new homes on the London Road Block site (SLAA ID: 814).
- 2.16. Another strategic site allocation, at Mindenhurst, Deepcut (Former Princess Royal Barracks), will deliver approximately 1,200 new homes. This reflects the outline planning permission (Ref: 12/0546) granted in 2014 for the expansion of the existing village. This single site makes a significant and front-loaded contribution to the supply of new homes over the plan period. As of March 2023, 288 new homes had been completed.
- 2.17. Outside of the settlement area, the Countryside Beyond the Green Belt is the next most sequentially preferable location for new homes.
- 2.18. The SLAA identified sites previously within the Countryside Beyond the Green Belt that will deliver approximately a further 284 homes within the plan period. In addition, 392 (net) new homes have been constructed and a further 522 (net) new homes are expected to be delivered on sites that currently benefit from planning permission previously located within the Countryside Beyond the Green Belt. The total contribution of homes from sites previously in the Countryside Beyond the Green Belt is therefore 1,198.



- 2.19. The boundaries of the Countryside Beyond the Green Belt reflect development with planning permission as shown in the Policies Map.
- 2.20. In the rural East of the Borough, which is covered by Green Belt, the delivery of new homes will be focused within the villages which are inset from the Green Belt. Opportunities for the development of new homes are generally limited to infilling within villages, redevelopment of previously developed land, and rural exception sites.



Table 4 – Number of dwellings (net) per delivery source by location in the Borough

Location	Completions	Commitments	SLAA	Total
Bagshot	196	122	112	430
Camberley	391	328	1,319	2,038
Deepcut	320	1,014	61	1,395
Frimley	145	79	230	454
Frimley Green	12	173	60	245
Mytchett	126	137	23	286
West of the Borough Total	1,190	1,853	1,805	4,848
Bisley	1	3	22	26
Chobham	58	17	106	181
Lightwater	2	3	21	26
West End	238	1	37	276
Windlesham	12	157	49	218
East of the Borough Total	311	181	235	727
Windfall Allowance (non-spatial)	-	-	481	481
Lapse-Rate	-	-44	-	-44
Total	1,501	1,990	2,521	6,012

- 2.21. The housing supply incorporates a windfall allowance in accordance with the NPPF. Windfall developments are those which have not been specifically identified in the Local Plan or SLAA process, and often comprise previously developed sites that have unexpectedly become available. Windfall allowances have been included for small sites, prior approvals and rural exception sites and are based on previous rates of delivery that have been projected forward.



- 2.22. To ensure delivery of the housing requirement, a supply buffer can provide flexibility where there are unimplemented or slower implementation of planning permissions for housing development. The Housing Trajectory in Appendix 2 identifies that the annual projected delivery of new homes is greater than the annual Local Housing Need figure for each of the first 12 years of the Local Plan period. Against the 5,578 dwellings housing requirement for the whole plan period, the Local Plan demonstrates a sufficient housing supply buffer against the Housing Requirement.
- 2.23. A housing implementation strategy will monitor and manage delivery of the supply of housing land to meet the housing requirement. This will include annual reviews of the SLAA and five-year housing land supply, an assessment of the risks to delivery, including monitoring the availability of Suitable Alternative Natural Greenspace (SANG), and setting out action to facilitate delivery, including proactive working with partners and developers. Progress will be reported through the Council's Authority Monitoring Report.

Employment

- 2.24. Surrey Heath benefits from a buoyant economy and a diverse economic base, with high technology industries strongly represented alongside traditional and advanced manufacturing. The Borough lies within the County of Surrey, with the County Council taking on the economic development lead role from the former M3 Local Enterprise Partnership. The Borough also forms part of a functional economic area, which extends into Hampshire, comprising the three local authority areas of Hart, Rushmoor and Surrey Heath.
- 2.25. The Employment Land Technical Paper update (2023) sets out employment floorspace need projections for Surrey Heath. The Spatial Strategy plans to meet the employment land needs of the Borough, as part of the Hart, Rushmoor and Surrey Heath Functional Economic Area, principally by protecting and supporting employment uses within designated Strategic and Locally Important Employment Sites, along with support for new employment uses, at suitable locations beyond these areas. The Strategic and Locally Important Employment Sites are identified on the Policies Map. The majority of employment uses are clustered close to the A331 in the western urban centres of Camberley and Frimley and other sites are distributed across the Borough.



Town Centre Uses

- 2.26. A thriving town and other centres will be vital to the success of the Borough as a good place to live. The form and nature of town and other centres are changing, and it is vital that the Spatial Strategy supports development commensurate with the scale and hierarchy of the centres within the Borough. Town and other centres will support a mix of uses and significantly the Town Centre Uses Study (2019) produced by Lambert Smith Hampton identifies no Borough wide capacity for new retail floorspace over the plan period for either comparison or convenience goods after taking account of existing commitments and vacant floorspace.

Green Belt and Countryside Beyond the Green Belt

- 2.27. In total 43% of land within Surrey Heath is designated as Green Belt. The Spatial Strategy seeks to deliver the National Planning Policy Framework objective of protecting Green Belt land by directing development away from this area. Development within the Green Belt will be assessed in line with national policy whilst having regard to local circumstances and very special circumstances, as referenced in Local Plan policies, including Policy GBC1.
- 2.28. Development opportunities in the Countryside Beyond the Green Belt have been explored through the Countryside Capacity Study and SLAA and suitable sites for new homes included in the supply. Development in land designated as Countryside Beyond the Green Belt will be assessed in line with national policy and Local Plan policies, including Policy GBC2.

Policy SSI: Spatial Strategy

- 1) To deliver sustainable growth, the Council will permit development which is consistent with the following broad spatial framework for the scale and location of development:
- a) New development will be directed to the defined settlement areas in the west of the Borough, as shown on the policies map, and comprising the following areas:
 - i. Camberley
 - ii. Frimley
 - iii. Frimley Green
 - iv. Mytchett
 - v. Deepcut, and
 - vi. Bagshot village.
 - b) Within this area, Camberley Town Centre will be a focus for significant new development, at high density, to support the regeneration of the town centre.



- c) The east of the Borough is heavily constrained by environmental designations and Green Belt and will have limited capacity to accommodate new development. Development opportunities in this area will be focused in:
- i. Lightwater village;
 - ii. Bisley, Chobham, West End and Windlesham villages, which are inset within the Green Belt.

New Homes

- 2) Over the period 2019 – 2038, the Council will ensure that, subject to the availability of deliverable avoidance and mitigation measures in respect of the Thames Basin Heath Special Protection Area, provision is made for the delivery of at least 5,578 new homes in the Borough. This housing requirement will be delivered from completions, existing planning permissions, allocations and SLAA sites as follows:
- a) Approximately 4,848 (net) new homes focused in the settlement areas in the West of the Borough, including:
 - i. In Camberley, approximately 2,178 (net) new homes, including approximately 1,548 net new homes in Camberley Town Centre, focused on two large site allocation at London Road Block (approximately 524 net new homes) and Land East of Knoll Road (approximately 340 net new homes),
 - ii. A major site allocation at Mindenhurst in Deepcut (Princess Royal Barracks site) of about 1,200 homes and Suitable Alternative Natural Greenspace,
 - iii. In Frimley, approximately 454 (net) new homes,
 - iv. In Frimley Green, approximately 245 (net) new homes,
 - v. In Mytchett, approximately 286 (net) new homes, and
 - vi. In Bagshot Village, approximately 430 (net) new homes.
 - b) Approximately 727 homes in the east of the Borough.
 - c) Other sources of supply to meet the housing requirement will include windfalls.

Employment

- 3) The Borough's defined Strategic and Locally Important Employment Sites will be protected and supported for employment uses, to ensure that the employment land needs of the Borough, can be met and recognising the wider the need to support the wider economic needs of the Functional Economic Area. These sites will contribute to meeting the forecast increase in the total number of Employment Use Class jobs (Use Class E(g) and Uses Classes B2 and B8).



Town Centre Uses

- 4) Surrey Heath's hierarchy of town centre, district centres, local centres and neighbourhood parades will be protected and enhanced by encouraging a range of uses consistent with the scale and function of the centre having regard to its place in the following hierarchy:
 - a) Camberley Town Centre,
 - b) Bagshot and Frimley district centres,
 - c) Local centres (as defined in policy ER8),
 - d) Neighbourhood parades (as defined in policy ER9).
- 5) Main town centre uses, including retail, will be focused within Camberley Town Centre to support its vitality and viability in line with policy CTC1 and in other centres in accordance with their role and function and as set out in policies ER8 and ER9.
- 6) Development for main town centre uses will be assessed sequentially in accordance with national policy and Policy ER7.
- 7) Residential uses in centres will be supported on allocated sites and on upper floors, and in ground floor locations where this would support the vitality and viability of the town centre.

Green Belt and Countryside Beyond the Green Belt

- 8) In the Green Belt new development will be strictly limited and only permitted where it is in line with the National Planning Policy Framework or otherwise complies with relevant Local Plan policies, including policy GBC1.
- 9) In the Countryside beyond the Green Belt new development will be limited in line with the National Planning Policy Framework and other relevant Local Plan policies, including policy GBC4.



Policy SS2: Presumption in Favour of Sustainable Development

- 2.29. National planning policy places the presumption in favour of sustainable development at the heart of its approach to planning, and states that ‘the purpose of the planning system is to contribute to the achievement of sustainable development’.

Policy SS2: Presumption in Favour of Sustainable Development

- 1) In considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development set out in the National Planning Policy Framework (NPPF).
- 2) Planning proposals that accord with the policies in the Surrey Heath Local Plan and with any Neighbourhood Plan policies will be approved unless material considerations indicate otherwise. The Council will work with applicants to secure development that improves the social, environmental and economic condition of the Borough.
- 3) Where there are no policies relevant to the application or the most relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise taking into account:
 - a) The application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposal;
 - b) The availability and deliverability of avoidance and mitigation measures relating to the protection of the Thames Basin Heaths Special Protection Area; and
 - c) Whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.

- 2.30. Policy SS2 seeks to ensure that planning decisions reflect the national presumption in favour of sustainable development and to ensure that this approach can be taken where a local plan is silent or policies become out of date.
- 2.31. The NPPF identifies that some assets or areas of particular importance may mean that proposals are not supported despite the presumption in favour. These are identified as including land designated as Green Belt and habitats sites which include Special Protection Areas and Special Areas of Conservation, designated heritage assets and Sites of Special Scientific Interest. These are designations that all lie within Surrey Heath Borough, and will therefore be a factor in implementing this Policy and the presumption in favour of sustainable development.



- 2.32. The wording of SS2 reflects the fact that the whole of the Borough lies within 5km of the Thames Basin Heaths Special Protection Area. The presumption in favour of sustainable development does not apply where development that requires an appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. As all new residential development in the Borough will be affected by these directives, an appropriate mechanism for mitigation (through Suitable Alternative Natural Green Space and Strategic Access Management and Monitoring measures as set out in Policy EI of this Plan) has been put in place.

Policy SS3a and SS3b: Climate Change Mitigation and Adaptation

- 2.33. Climate change is one of the greatest challenges facing our society. The scientific evidence of climate change is overwhelming and will have a lasting impact on people and wildlife. The [Intergovernmental Panel on Climate Change 2018](#) report makes clear that the impacts of climate change are being experienced now through unprecedented global trends and through more localised severe weather events. The Climate Change Act 2008, which was amended in 2019, sets the target for the UK to achieve net zero carbon emissions by 2050. The Paris Agreement (2015), which was adopted by participating member states of the 21st Conference of the Parties (COP) of the United Nations Framework Convention on Climate Change, establishes an aspiration to globally achieve net zero greenhouse gas emissions during the second half of the 21st century.
- 2.34. The UK Technical Report for the third Climate Change Risk Assessment (CCRA3) identifies a wide range of potential costly impacts of climate change including on health and productivity, affecting many of our households, businesses and public services. Impacts on the natural environment range from a deterioration in soil health and agricultural productivity to higher flood risk and adverse impact on water availability. Heatwaves in recent summers have caused significant impacts on mortality and morbidity, and disruptions to public services (including hospitals, care homes, schools and prisons), particularly in England. CCRA3 concluded that there is still little preventative action being taken to address health risks from overheating in new or existing homes. Furthermore, it has been identified that housing policies to address Net Zero may increase the risk of overheating and there is a need to tackle the full range of housing interventions (mitigation, damp, flooding, overheating) in a holistic manner.



- 2.35. The Council has a very important role in shaping new and existing developments in ways that reduce carbon emissions and positively build community resilience to problems such as heat stress or flood risk. Policies in the Local Plan must ensure that development within the Borough contributes to the mitigation of, and adaptation to climate change. This policy sets out the overarching policy approach to climate change, drawing on the evidence from the Surrey Heath [Climate Change Study](#) (2020).
- 2.36. There is an important link between the physical and social environment in which we live and how healthy we are, both physically and mentally. Planning has a central role in creating places where it is easier for people to live healthier lives and robust climate change policies can help achieve this. In delivering measurable climate change mitigation and adaptation measures, the Policy seeks to ensure that new development in Surrey Heath considers local issues relating to health and wellbeing at an early stage of the planning process and will also deliver improvements and contribute to health and wellbeing, making it easy for the residents of the Borough to live healthy, green lifestyles.

Policy SS3a: Climate Change mitigation

- l) To support a decarbonisation trajectory to net zero by 2050, the Council will seek to deliver significant reductions in carbon emissions for the Borough. This will be achieved by:
- a) requiring major applications to deliver net zero carbon development, unless it can be clearly demonstrated with evidence that this is not feasible and/or viable. Where it is clearly demonstrated that it is not financially or technically viable to achieve net zero-carbon development on-site, any shortfall in carbon reductions should be addressed via off-site measures or through the provision of a carbon offset payment secured by legal agreement.
 - b) ensuring that new development contributes to addressing climate change through low/zero carbon design and improves energy efficiency for all residential and non-residential buildings, as set out in Policy DH8;
 - c) supporting renewable and low carbon energy and heating schemes for major development proposals in accordance with Policy E5;
 - d) supporting the low carbon economy;
 - e) directing development to locations in the defined settlement areas of the Borough that will minimise the need to travel and maximise the use of sustainable modes of transport, promoting a modal shift away from private car use;
 - f) promoting sustainable modes of transport through Policy IN2, including provision and installation of electric vehicle charging points and supporting infrastructure;



Policy SS3a: Climate Change mitigation

- g) ensuring that trees are protected, in accordance with Policy DH5, and that there is no net loss in the carbon storage capacity provided by the Borough's trees (generally equates to ensuring that there is no net loss in the biomass equal to the original tree);
 - h) increasing the potential for green infrastructure and habitats to support carbon sequestration and store carbon, including through biodiversity net gain as set out in Policy E3, and supporting the planting of trees in the Borough; and
 - i) requiring new development to manage construction waste effectively and responsibly to reduce the carbon emissions of construction activities, set out in policy DH8.
- 2) Development proposals will need to demonstrate how they are maximising reductions in carbon emissions and contributing to the decarbonisation trajectory for net zero by 2050. Development proposals are required to provide a Sustainability Statement setting out how the matters in this policy have been addressed.

Policy SS3b: Climate Change adaptation

- l) New development will be permitted which helps build communities that are resilient to climate change and contribute to healthy living by:
 - a) being designed so as to maximise the potential for climate change adaptation, as set out in Policy DHI, to ensure that new development minimises vulnerabilities and provides resilience to impacts arising from climate change;
 - b) positively contributing to creating high quality, active, safe and accessible places;
 - c) maximising sustainable water use, in accordance with Policy DH4;
 - d) addressing existing and future flood risk, in accordance with Policy E6 and E7;
 - e) demonstrating adaptation for more frequent and severe rainfall events through measures including maximising the use of permeable surfaces across the development site.
 - f) maximising the potential of green infrastructure in the design of new development to facilitate adaptation to climate change, in accordance with Policy IN5, E3 and E7;
 - g) planting trees and other vegetation, where appropriate as part of the landscape scheme, to provide shading of amenity areas, buildings and streets;
 - h) delivering urban greening, including incorporating green walls and green roofs into new development;



Policy SS3b: Climate Change adaptation

- i) delivering habitat connectivity via biodiversity net gain, in accordance with Policies E2 and E3; and
 - j) minimising the potential for heat stress, particularly areas or types of development at greater risk of heat stress, through innovative and passive design measures; and
 - k) requiring development proposals in and around areas of high risk of wildfire to be designed and managed to prevent the ignition and spread of fire, taking into account the risk to health and potential damage to significant habitats.
- 2) Development proposals will need to demonstrate how they are maximising their adaptive capacity and are required to set out in a Sustainability Statement how they have incorporated adaptations for a changing climate and changing weather patterns in order to avoid increased vulnerability and offer high levels of resilience to the full range of expected impacts.
- 3) Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated into new development where appropriate. Proposals for major development schemes should incorporate a Health Impact Assessment (HIA).

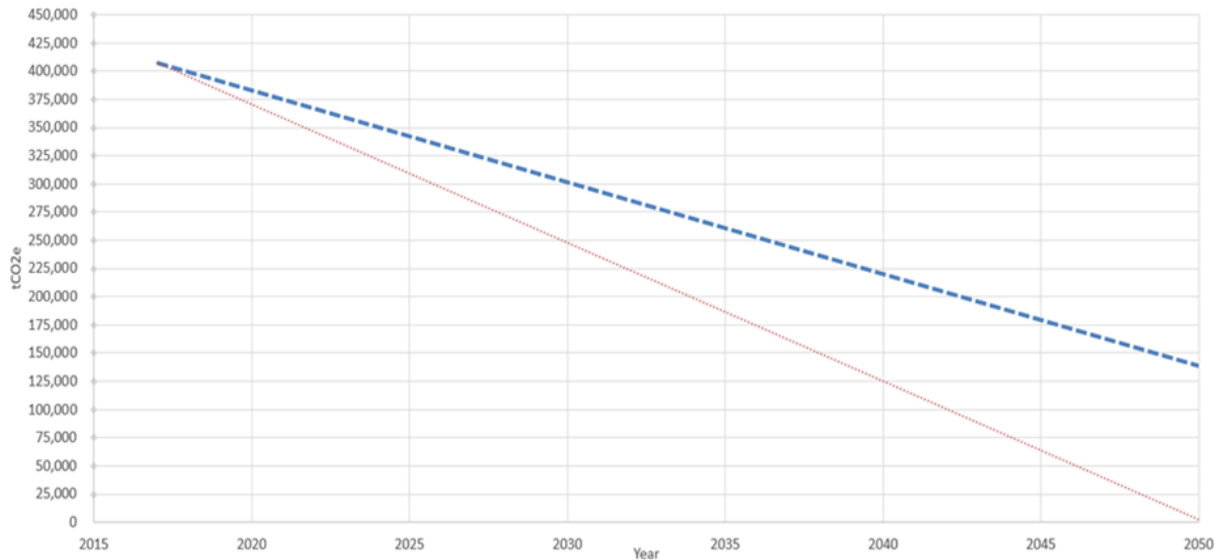
- 2.37. Section 19(1A) of the Planning and Compulsory Purchase Act 2004 states that ‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change’.
- 2.38. The NPPF identifies the planning system as having an important role in supporting the transition to a low carbon future in a changing climate, including the valuable contribution that small scale projects can provide. The NPPF states that the planning system should help shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience. The NPPF identifies that Plans should take a proactive approach to mitigating and adapting to climate change.
- 2.39. In 2018, the Government’s Road to Zero strategy set out its ambitions for all new cars and vans to be effectively zero emission by 2040. In October 2021, the Government published the Net Zero Strategy: Build Back Green that sets out policies and proposals for keeping the United Kingdom on track for its coming carbon budgets and a vision for a decarbonised economy in 2050. The Surrey Climate Change Strategy and Climate Change Delivery Plan 2021 – 2025 sets out a goal to achieve net zero by 2050 and provides a joint framework for collaborative action on climate change across Surrey’s local authorities and other partners.



- 2.40. In order to meet the requirements of Section 19(1A) of the Planning and Compulsory Purchase Act 2004, it is important that Local Plans include policies designed to contribute to the mitigation of, and adaptation to, climate change.
- 2.41. The [Surrey Heath Climate Change Study](#) (2020) explores how climate change objectives, both in respect of mitigation and adaptation, might most effectively be addressed through the Local Plan. To achieve this, the study seeks to answer the following three questions for both climate change mitigation and adaptation:
1. What is the context?
 2. What is the baseline scenario?
 3. What are the intervention options feasibly open to the Council?
- 2.42. The study sets out that, based on the Borough's baseline emissions as of 2017, there will be an estimated reduction of 45% in carbon emissions by 2040 based on current trends. The study identifies that in order to achieve net zero by 2050, there will be a need to achieve carbon emission reductions of approximately 70% by 2040, as illustrated in Figure 3 (below). This illustrates that there is a significant 'policy gap' of 25% that needs to be addressed through the Local Plan and the study concludes that objectives relating to climate change mitigation and adaptation must be central to Local Plan decision-making. However, the study also makes clear that achieving a net zero decarbonisation trajectory will also require interventions outside of the Local Plan's sphere of influence, most notably in respect of retrofitting of existing buildings, but also in numerous other areas, e.g. in respect of supporting electric vehicle uptake and new energy infrastructure.



Figure 3: A baseline emissions reduction scenario (in blue) and a 'net zero 2050' scenario (in red)



- 2.43. The Surrey Heath Climate Change study makes a number of recommendations for interventions that the Local Plan can take to maximise carbon emission reductions in new development and the resilience of local communities to a changing climate. These recommendations have been incorporated into the Local Plan, including directly into the suite of climate change policies for which policy SS3a is overarching.
- 2.44. A priority of the Council is for new developments to achieve net zero carbon emissions. Net zero carbon means reducing operational emissions from all regulated uses (i.e. space heating, lighting, hot water and ventilation), and minimising both annual and peak emissions. Developments should also explore routes towards net zero carbon across the development life-cycle, to avoid a legacy of emissions to be addressed in the future. Detailed guidance for the delivery of net zero development includes the Surrey County Council Net Zero toolkit, currently in development, and the UK Net Zero Carbon Buildings Standards.



- 2.45. All proposals for new residential development should demonstrate how they are maximising reductions in carbon emissions and contributing to the decarbonisation trajectory for net zero by 2050, as well as demonstrate how they are maximising climate resilience. In order for major developments to demonstrate compliance with this policy, Sustainability Statements proportionate to the scale of development proposed should be submitted with planning applications. These statements should set out a comprehensive approach to mitigating and adapting to climate change covering the full range of issues set out in this policy. Application drawings and supporting information should show how the measures proposed form an integral part of the proposed design. Sustainability Statements relating to major development, infrastructure and potentially vulnerable developments should incorporate severe weather management plans.
- 2.46. Where a development proposal would result in the loss of trees, it should be clearly demonstrated by the applicant that the loss will be offset through the provision of tree or vegetation planting of equal or greater carbon storage capacity.
- 2.47. In line with national planning policy and guidance applicants will need to take these Policy requirements into account when acquiring sites and in preparing development proposals. Development proposals that do not meet the Policy requirements will only be supported in exceptional circumstances and where the applicant can demonstrate site specific circumstances that can identify circumstances that were unaccounted for in the Whole Plan Viability Study. Consideration should also be given to the Surrey County Council Net Zero toolkit, which is supported by detailed viability assessments. In order for the Council to consider such circumstances an independent viability appraisal must be submitted. To ensure transparency, this will be published on the Council's website and developers will be expected to meet the costs of any financial appraisals commissioned by the Council as well as their own. Notwithstanding this the Council will not permit development if it would compromise the Council's ability to meet its duties under Section 19(1A) Planning and Compulsory Purchase Act 2004.
- 2.48. Successful adaptation to climate change requires a holistic approach, which includes everything from flood risk to heat stress. Green infrastructure plays an important role in climate change mitigation, through contributing to carbon sequestration, and climate change adaptation, including through reducing heat stress and the potential for surface water flooding. This could include the incorporation of bio-diverse roofs, combination green and blue roofs and green walls, where appropriate, into new development.



- 2.49. The Council's Strategic Flood Risk Assessment identifies the potential impact of Climate Change on flood risk in the Borough. Where it can be demonstrated that the design of the development can deal with flood risk safely in the long term, they should be considered positively in the exception test (and sequential test if applied). This concept has been widely applied in Europe, ensuring that communities can 'live with' flood risk. This is particularly important where there are no alternative realistic options for new development.
- 2.50. As a result of climate change, the impacts of heat stress in residential properties and urban environments are likely to become increasingly prevalent and impact on the health of local people. Heat stress is particularly of concern for the elderly who are less able to regulate their own body temperature and urban areas at greater risk of the urban heat island effects. The Local Plan will seek to ensure the new development for at risk groups to heat stress, such as the elderly, or in at risk areas of heat stress, such as urban areas, takes full account adaptation measures for heat stress in site layout and design.
- 2.51. Climate projections indicate that wildfires will become more frequent and more severe in Surrey. Significant wildfires have occurred in Surrey Heath Borough and even small fires can have major impacts including harm to priority species and habitats, economic damage, health impacts and potentially the loss of life. Heathland in Surrey is prone to wildfire and dry grassland can also be susceptible. Developments located in and around habitats at risk of wildfire should ensure that measures are taken to prevent increased risk including through site design that prevents the spread of fire, and management that maintains fire prevention measures.
- 2.52. Through supporting and delivering zero/low carbon development which is resilient to climate change, the policy will also contribute significantly to health and wellbeing. The creation of healthy environments for people of all ages across the Borough will be a key consideration when the Council assesses and determines planning applications to support and enhance health and wellbeing in the Borough, taking account of site-specific considerations. A healthy environment can promote and encourage healthy lifestyles and these are aided through good urban design, green open spaces and access to active travel choices such as walking and cycling. Other than the built and natural environment, there are social and cultural factors that promote good health and wellbeing – such as a variety of community groups, religious institutions, arts, and culture and leisure facilities.
- 2.53. For major development proposals it is a requirement to prepare a Health Impact Assessment (HIA). The HIA should identify the likely health impacts of the development and include measures to improve health outcomes and address negative effects and inequalities. The scope of a HIA will vary depending on the size of the development and its location.



Section 3: Housing

Policy HA1: Site Allocations

- 3.1. Policy HA1 allocates sites for development within Surrey Heath to support the Local Plan's Spatial Strategy, to help meet the identified housing requirement in the Borough set out in Policy SSI.
- 3.2. Site allocations are informed by the conclusions of the Strategic Land Availability Assessment 2023 ('SLAA'). The SLAA is updated regularly and assesses potential development sites within the Borough. The SLAA process has identified a range of sites that are considered deliverable and/or developable within the Plan Period (as defined in [NPPF Annex 2: Glossary](#)).
- 3.3. The Local Plan allocates those SLAA sites that have been found to be sustainably located and are also projected to deliver 10 net new homes or more. Specific site allocation policies and requirements have been set out for sites projected to deliver 25 new homes or more. The allocation of these sites has had regard to national policy and the Spatial Strategy for Surrey Heath.
- 3.4. The findings of the Sustainability Appraisal have also been taken account of in the allocations process. Development is directed to the most sustainable locations, making the best use of previously developed land.
- 3.5. Together, the site allocations seek to deliver a significant proportion of the Local Plan's housing requirement. The remainder of the Borough's housing requirement will be delivered on non-allocated sites that are identified in the SLAA, alongside sites that currently benefit from outline or full planning permission and windfalls. The SLAA provides an assessment of all sites that are suitable, available and achievable for housing and economic development uses over the plan period. Of the housing sites that form the supply, only those meeting the criteria outlined above have been specifically allocated.
- 3.6. Site allocations do not grant planning permission for the site. Planning applications will continue to be determined on their own merits in relation to the policies in this plan. The allocated approximate quantum of development for each site is based on an initial assessment of its potential capacity and is neither a maximum nor a minimum. Further detail and evidence will need to be considered at the planning application stage regarding constraints, design considerations, and the need to deliver the most efficient use of the land. Significant reductions from the approximate housing numbers as set out in the site allocations will be strongly resisted.



- 3.7. Policies HA1, HA2, HA3 and HA4 set out the Borough’s residential-led site allocations. Development proposals for allocated sites will be required to accord with the detailed development requirements as set out in the relevant site allocation policy. The Local Plan contains numerous other policies, which also apply to these sites in addition to the specific requirements set out in the site allocation policies. Where site allocation policies set out requirements that differ to those in another policy within the Local Plan, the site allocation policy will take precedence.
- 3.8. Policies HA2 and HA3 set out site-specific development requirements for the strategic housing allocation sites located in Camberley Town Centre. Policy HA4 sets out site-specific development requirements for the strategic site at Mindenhurst (formerly Princess Royal Barracks), Deepcut, which benefits from outline planning permission and is currently under construction for phases where full planning permission has been secured.
- 3.9. Further detailed information about sites is available in the SLAA, which forms part of the Local Plan [evidence base](#). The SLAA site reference number is shown on the site policy, for ease of cross referencing.

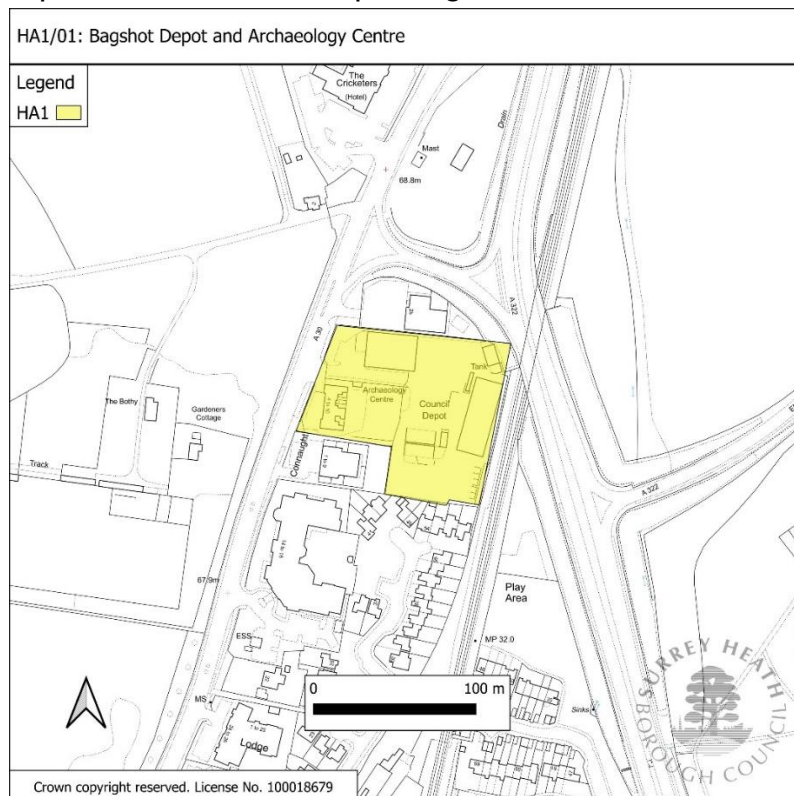
Policy HA1: Housing allocations
<ul style="list-style-type: none">1) The following sites are allocated for housing to contribute towards the delivery of new homes to meet Surrey Heath’s housing requirement in Policy SS1.2) Development proposals for residential (C3) or extra-care (C2) use on these sites are required to clearly identify how the proposed development addresses the identified site-specific considerations or requirements.3) Where development proposals cannot clearly demonstrate that the identified site-specific considerations or requirements have been addressed, the planning application will be refused.
Site allocations for sites projected to deliver 25 net new homes or more



Policy HA1: Housing allocations

HA1/01 - Bagshot Depot and Archaeology Centre, London Road, Bagshot, GU19 5HN

- 1) Bagshot Depot and Archaeology Centre is allocated for 50 net units.
- 2) Development proposals are required to:
 - a) demonstrate that the design of the scheme is genuinely conservation-led, having special regard to the retention and enhancement of the Archaeology Centre and the character of the Bagshot Park Conservation Area and its setting, in which the Grade II listed Bagshot Park forms the centre piece.
 - b) be sympathetic to the surrounding context of the site with regard to scale, height, and massing.
 - c) provide improved pedestrian and cycle access from the site to Bagshot District Centre.
 - d) demonstrate that the design of the scheme that it will not lead to a deterioration of air quality and have any adverse impacts to human health
 - e) biodiversity should be considered at an early stage in the planning process and incorporated into site masterplanning from the outset.



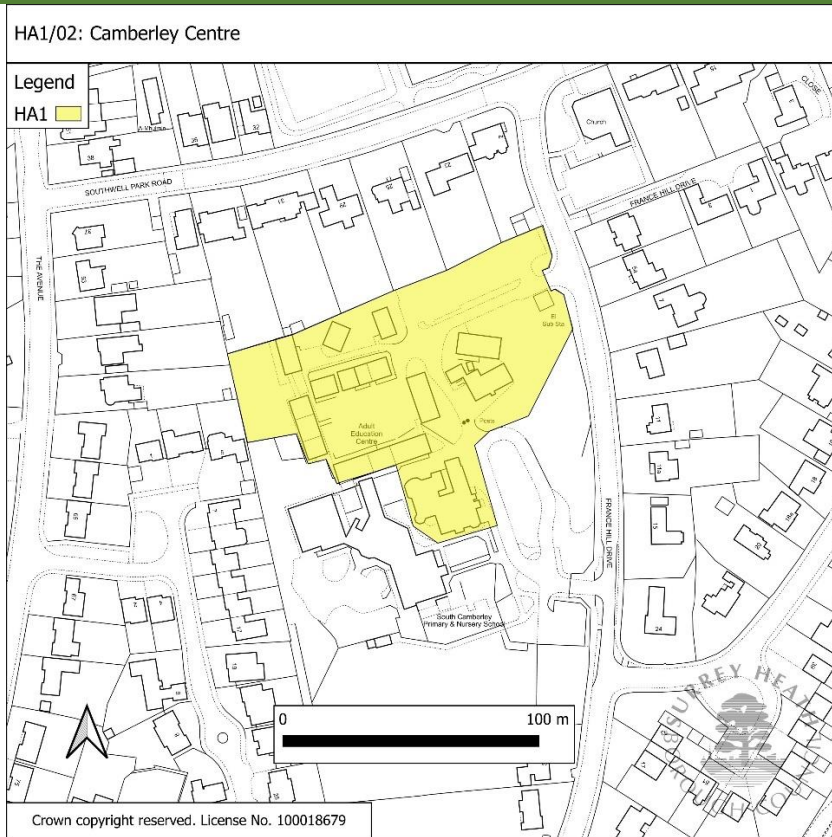
Policy HAI: Housing allocations

HA1/02 - Camberley Centre, France Hill Drive, Camberley, GU15 3QG

- 1) Camberley Centre is allocated for 35 net units.
- 2) Development proposals are required to:
 - a) demonstrate retain and reuse the existing Adult Education Centre (AEC) building, a local heritage asset, including its landscape setting.
 - b) implement a design-led development that is sympathetic to and integrates well with the scale, height, and character of the existing Adult Education Centre (AEC) building.
 - c) retain as far as practicable the existing abundance of trees and landscaping, which contributes to the local distinctiveness of the site, providing high quality amenity space.
 - d) retain the existing educational community use on-site, or re-provide the use at a suitable off-site location.
 - e) provide improved pedestrian and cycle access to Camberley Town Centre from the site.
 - f) provide suitable vehicular access to the site, and suitable highways access within the site.



Policy HA1: Housing allocations



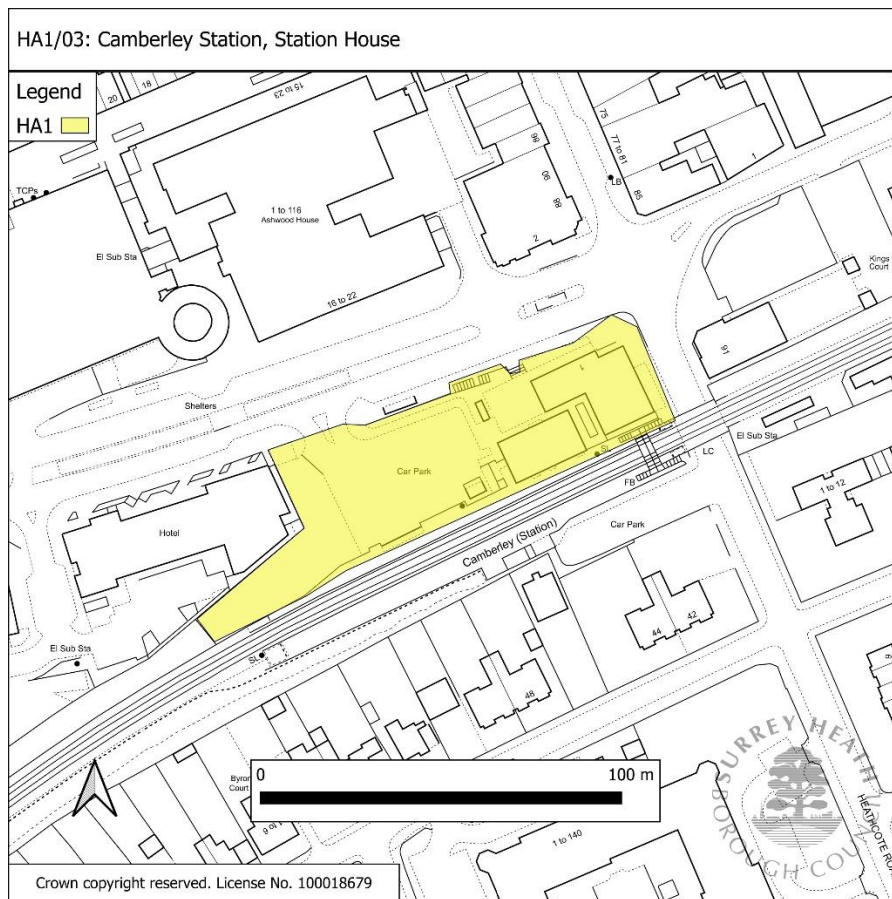
HA1/03 - Camberley Station, Station House, Pembroke Broadway, Camberley

- 1) Camberley Station is allocated for 150 net units.
- 2) Development proposals are required to:
 - a) deliver a high-quality, design-led, sustainable development suitable for the prominent gateway location to Camberley Town Centre.
 - b) to provide a satisfactory relationship with the surrounding context of the site with regard to scale, height, and massing.
 - c) Provide high-quality, usable private and communal amenity spaces.
 - d) incorporate a new or improved train station, with associated transport interchange facilities, including car and cycle parking.
 - e) incorporate 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.



Policy HA1: Housing allocations

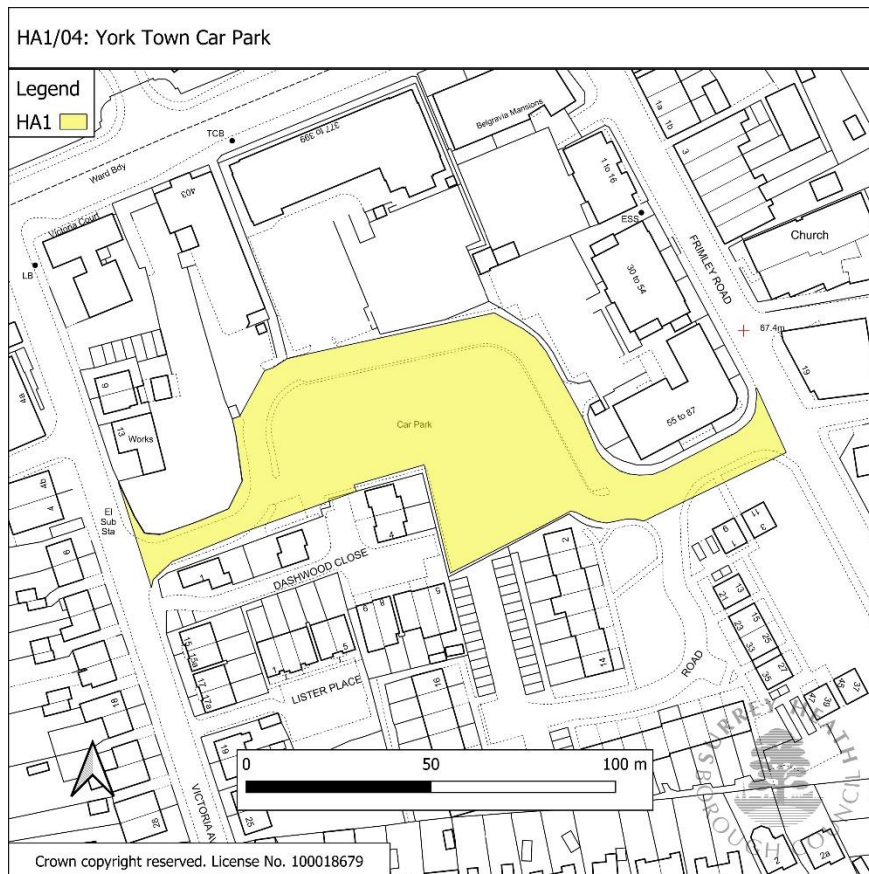
- f) improve interconnectivity between Camberley Train Station and the bus stops on Pembroke Broadway, through high-quality urban design, use of hard and soft landscaping, sightlines and signage.
- g) enhance visual connectivity between the site and Camberley Town Centre, through layout, arrangement of built form and public space, massing, design, materials and signage.
- h) be informed by the results of a full Noise Impact Assessment that considers the proximity to the railway line.
- i) incorporate vertical greenery and other urban greening techniques within the building design.



Policy HA1: Housing allocations

HA1/04 - York Town Car Park, Sullivan Road, Camberley

- 1) York Town Car Park is allocated for 27 net units.
- 2) Development proposals are required to:
 - a) deliver a high-quality, design-led development that is sympathetic to the existing character of the area, and has regard to the design, scale, height, and built-form of the adjacent approved development.
 - b) incorporate high-quality landscaping, including tree-planting along Sullivan Road, increasing the overall amount of greenery and vegetation in the locality and softening the existing townscape.
 - c) Provide high-quality, usable amenity space.
 - d) retain and/or re-provide the public car-parking currently on-site.
 - e) incorporate public access from the site to Frimley Road and Victoria Avenue, to encourage permeability and create linkages.



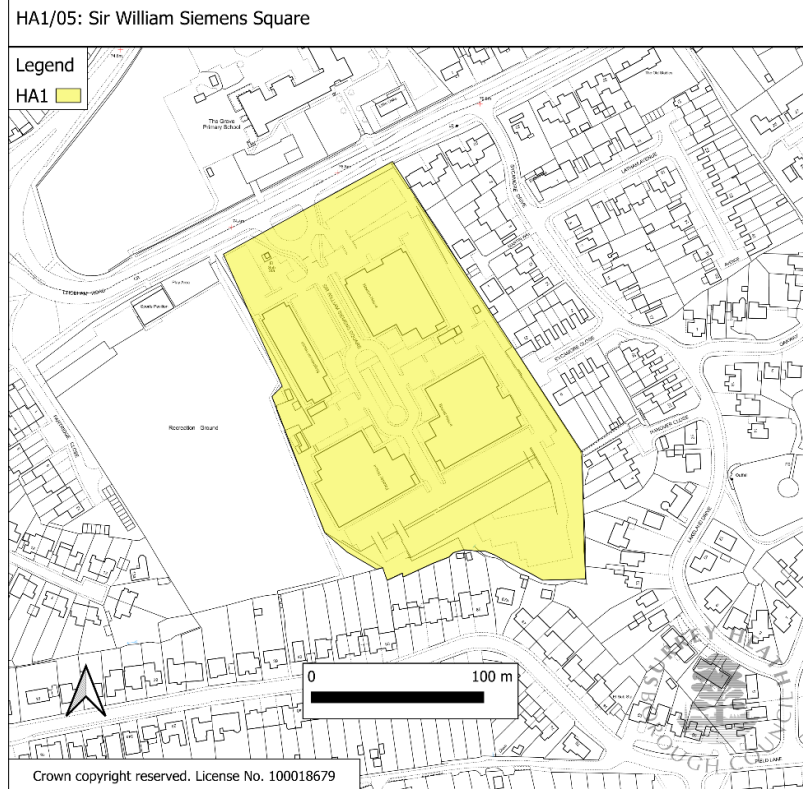
Policy HAI: Housing allocations

HA1/05 - Sir William Siemens Square, Chobham Road, Frimley

- 1) Sir William Siemens Square is allocated for 170 net units.
- 2) Development proposals are required to:
 - a) deliver a high-quality, design-led re-development scheme that is sympathetic to the character of the area, providing a density, scale, height and massing appropriate for the local context whilst making the most effective use of the land.
 - b) contribute to the urban greening of the area, providing high quality usable private and communal amenity space, including integrations of roof terraces and/or atrium courtyards within the envelope of the development.
 - c) retain the continuous verdant, sylvan and rural character of Chobham Road, including the retention of mature trees that contribute to the local distinctiveness.
 - d) incorporate high-quality, integrated hard and soft landscaping, seeking to retain and enhance the geometric layout of the site and incorporate well designed communal areas.
 - e) be sympathetic to and enhance the green, rural character of the neighbouring playing fields.
 - f) be sympathetic to the amenity of neighbouring residential areas.
 - g) incorporate improved pedestrian and cycle access to, and through, the site, with appropriate linkages to Frimley District Centre and the Station.
 - h) provide the maximum number of Gypsy and Traveller pitches or Travelling Showpeople plots that can be reasonably accommodated on the site, having regard to the level of local need within Surrey Heath and the criteria set out within Policy H10.
 - i) biodiversity should be considered at an early stage in the planning process and incorporated into site masterplanning from the outset.



Policy HA1: Housing allocations



HA1/06 - Chobham Rugby Club, Windsor Road, Chobham

- 1) Chobham Rugby Club is allocations for 91 net units.
- 2) Development proposals are required to:
 - a) deliver a high-quality, design-led, sustainable development that is suitable for the location of the site in Chobham village.
 - b) secure a suitable alternative location for the re-provision of the existing community and recreational uses on-site, within the Borough, which would be secured through an S106 agreement with the Council.
 - c) retain an appropriate provision of open green space on-site, to be accessible by local residents, which is well-integrated into a network of green infrastructure throughout the site.
 - d) provide on-site recreational play facilities in accordance with the Council's adopted standards.

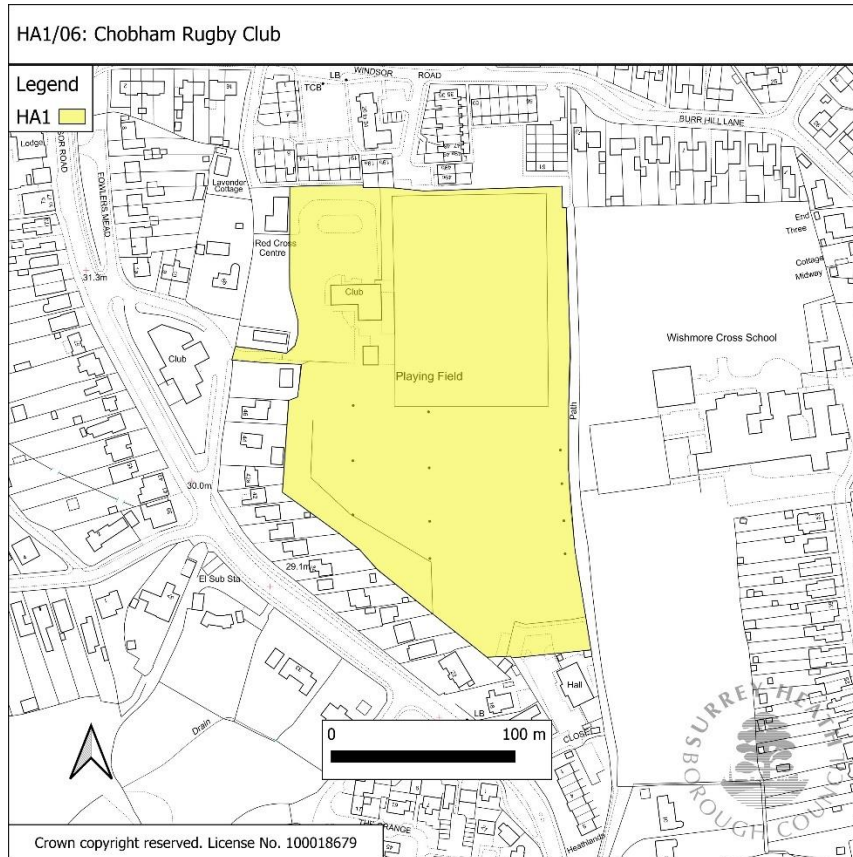


Policy HA1: Housing allocations

- e) deliver a strong sense of place that reinforces local distinctiveness and provides an attractive and functional living environment, established through a sensitive design that responds to the local context; including the topography and landscape of the area given the open space on and neighbouring the site.
- f) retain and enhance the local character of the area; incorporating high-quality landscaping that integrates well with the open, treed character of the surrounding area.
- g) retain and enhance the existing trees that form part of the boundary to the site as far as reasonably practicable.
- h) deliver 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, to provide linkages to the south toward Chobham high street.
- i) be sympathetic to the amenity of neighbouring residential areas and to enhance the green, open character of the neighbouring open space to the East.
- j) incorporate suitable vehicular access to the site from Windsor Road.
- k) deliver a network of high quality, attractive streets and amenity spaces that are convenient and safe to use.
- l) biodiversity should be considered at an early stage in the planning process and incorporated into site masterplanning from the outset.



Policy HA1: Housing allocations

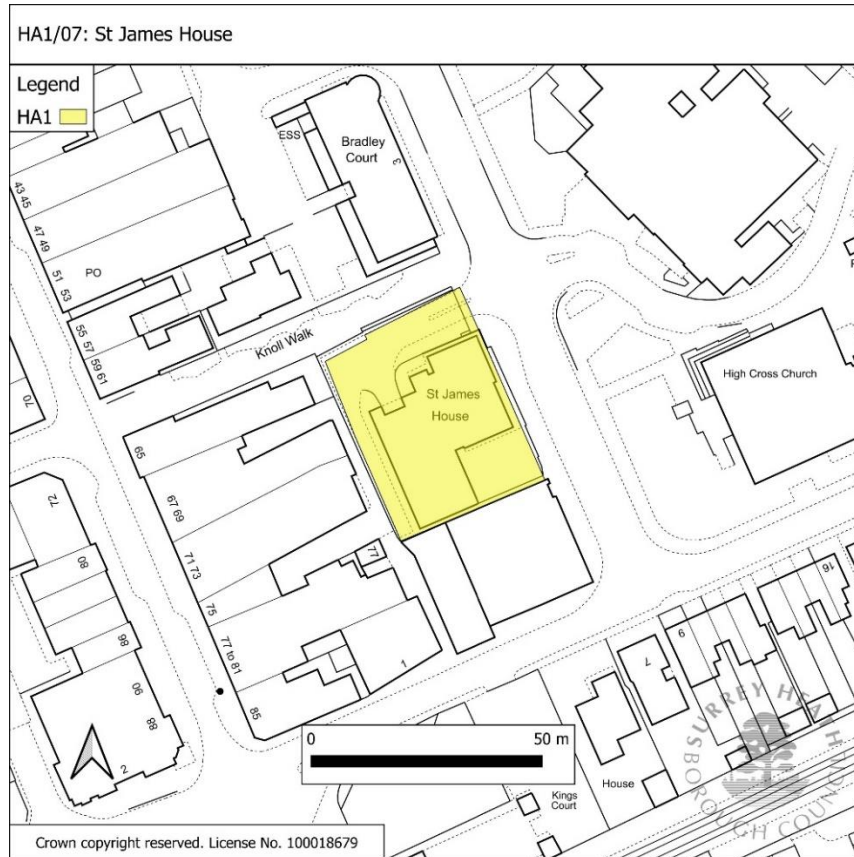


HA1/07 - St James House, Knoll Road, Camberley

- 1) St James House is allocations for 30 net units.
- 2) Development proposals are required to:
 - a) deliver a distinctive, flatted development of high-quality design, comprising 4 to 5.5 storeys, at a density which reflects the town centre location.
 - b) incorporate vertical greenery and other urban greening techniques within the building design. Incorporating high quality usable amenity spaces.
 - c) provide high quality soft and hard landscaping, ensuring that boundary treatment is attractive and durable, avoiding any visual barrier effects in the streetscape.
 - d) incorporate bin stores and cycle stores within the main structure of the site.
 - e) respect, frame, and reinforce, the sightlines between the town centre and the Grade II listed Obelisk in Camberley Park.



Policy HA1: Housing allocations



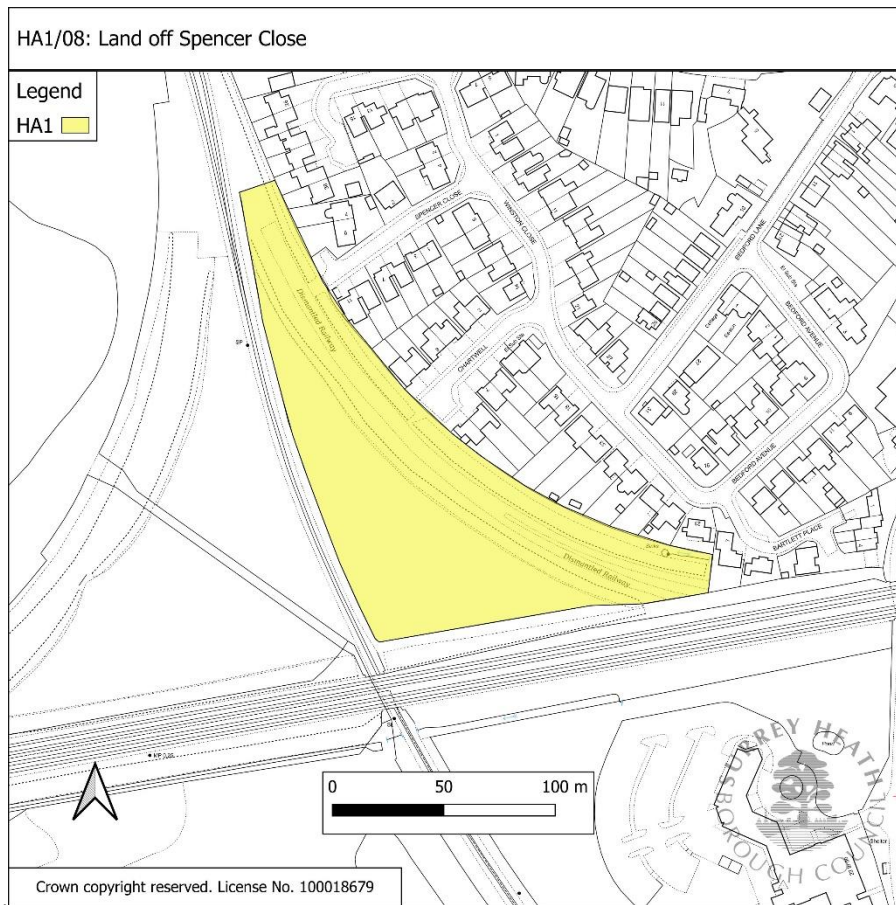
HA1/08 - Land off Spencer Close, Frimley Green

- 1) Land off Spencer Close is allocated for 60 net units.
- 2) Development proposals are required to:
 - a) deliver a high-quality, design-led development that is sympathetic to the existing character of the area.
 - b) incorporate high-quality landscaping and amenity space, enhancing and retaining the existing treed character of the site, which contributes to local distinctiveness.
 - c) demonstrate that the detailed site layout has been informed by the proximity to the railway flanking the southern boundary of the site regarding safety, noise, and visual barrier effects.



Policy HA1: Housing allocations

- d) retain and strengthen the existing tree planting and landscape buffering between the site and the railway line on the southern boundary of the site, to reduce noise and visual impacts from the railway.
- e) be informed by the results of a full Noise Impact Assessment that considers the proximity to the railway line.
- f) biodiversity should be considered at an early stage in the planning process and incorporated into site masterplanning from the outset.



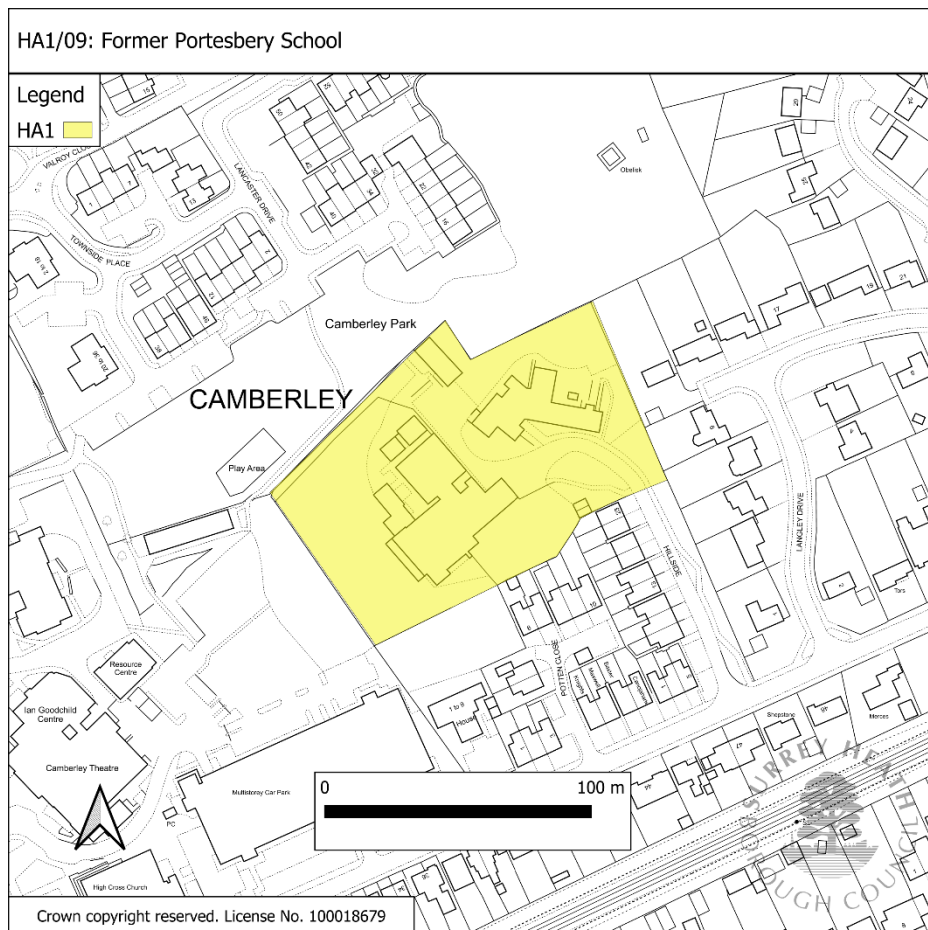
HA1/09 - Former Portesbery School, Portesbery Road, Camberley

- 1) Former Portesbery School is allocated for 36 net units.
- 2) Development proposals are required to:
 - a) deliver a high-quality, design-led development that is sympathetic to the existing character of the area.



Policy HA1: Housing allocations

- b) incorporate high-quality landscaping and amenity space, enhancing and retaining the existing treed character of the site, which contributes to local distinctiveness.
- c) protect and enhance of the setting of the Grade II Listed Obelisk within a wooded part of Camberley Park
- d) respect, frame, and reinforce, the sightlines between the town centre and the Grade II listed Obelisk in Camberley Park.
- e) incorporate improved pedestrian and cycle access to and from the site, with appropriate linkages to Camberley Town Centre



Site Allocations for sites projected to deliver between 10 – 24 net new homes:

- HA1/10 - Land rear of 192-210 London Road, Bagshot, allocated for 20 net



Policy HAI: Housing allocations

units.

- HAI/11 - The Deans, Bridge Road, Bagshot, allocated for 20 net units
- HAI/12 - 317 to 319 Guildford Road, Bisley, allocated for 17 net units
- HAI/13 - 280 Gordon Avenue, Camberley, allocated for 15 net units
- HAI/14 - Burwood House Hotel, 15 London Road, Camberley, allocated for 10 net units
- HAI/15 - 439 - 445 London Road, Camberley, allocated for 15 net units
- HAI/16 - Land Rear of 1 - 47 Sullivan Road, Camberley, allocated for 14 net units
- HAI/17 - Broadford, Castle Grove Road, Chobham, allocated for 15 net units
- HAI/18 - Land North of Guildford Road, Deepcut, allocated for 21 net units
- HAI/19 - Former Premier Site, Newfoundland Road, Deepcut, allocated for 13 net units
- HAI/20 - The Grange, St Catherines Road, Deepcut, allocated for 17 net units
- HAI/21 - 103 - 109 Guildford Road, Lightwater, allocated for 21 net units
- HAI/22 - Land adjacent to Sherrard Way, Mytchett, allocated for 16 net units
- HAI/23 - St Margarets Cottage and The Ferns, Woodlands Lane, Windlesham, allocated for 16 net units
- HAI/24 - Land East of Benner Lane, West End, allocated for 16 net units
- HAI/25 - Land at Chamness, Woodlands Lane, Windlesham, allocated for 20 net units

Sites Allocated or Extra Care or Residential Care Uses

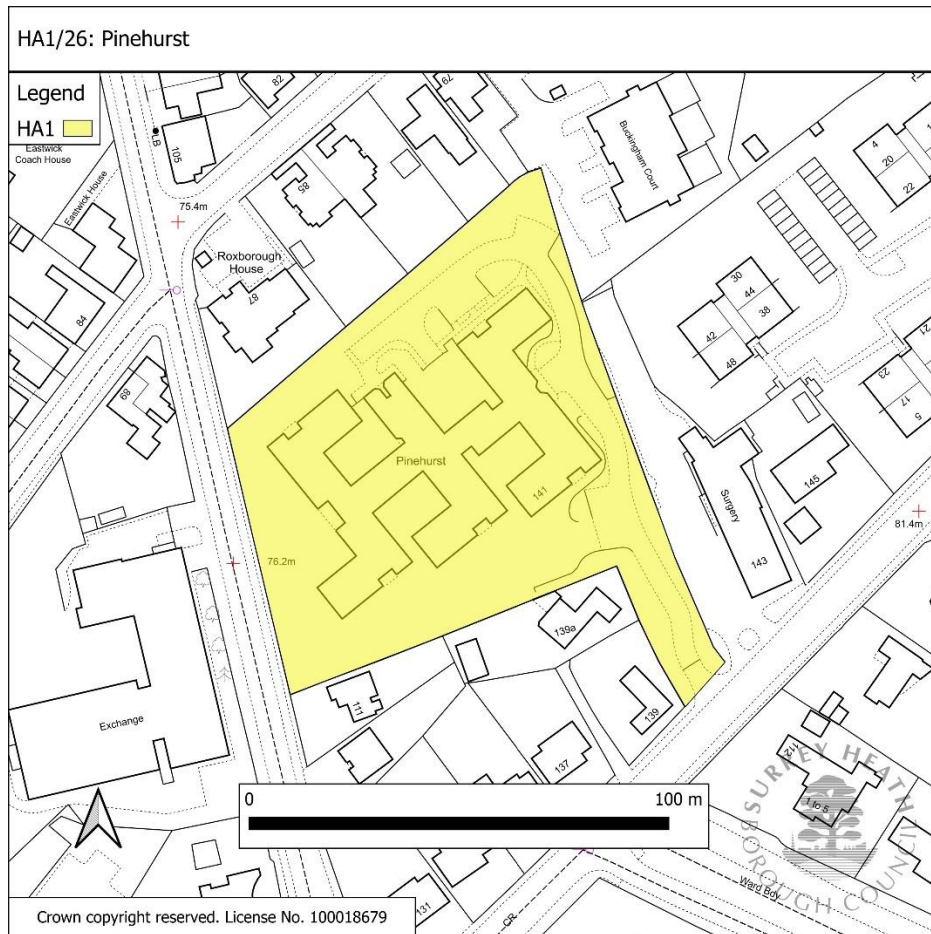
HAI/26 - Pinehurst, 141 Park Road, Camberley

- 1) Pinehurst, 141 Park Road is allocated for an extra-care development (C2), comprising 32 net homes (C3 equivalent) and supporting facilities.
- 2) Development proposals are required to:
 - a) be sympathetic to and integrate with the design of surrounding development.
 - b) provide high-quality, usable communal amenity spaces.
 - c) incorporate high-quality landscaping, retaining and enhancing the existing treed character of the site's boundaries, which contributes to local distinctiveness.
 - d) provide suitable vehicular access to the site and suitable highways access within the site.



Policy HA1: Housing allocations

- e) provide suitable pedestrian and cycle access from the site to create linkages to Camberley Town Centre.
- f) biodiversity should be considered at an early stage in the planning process and incorporated into site masterplanning from the outset.



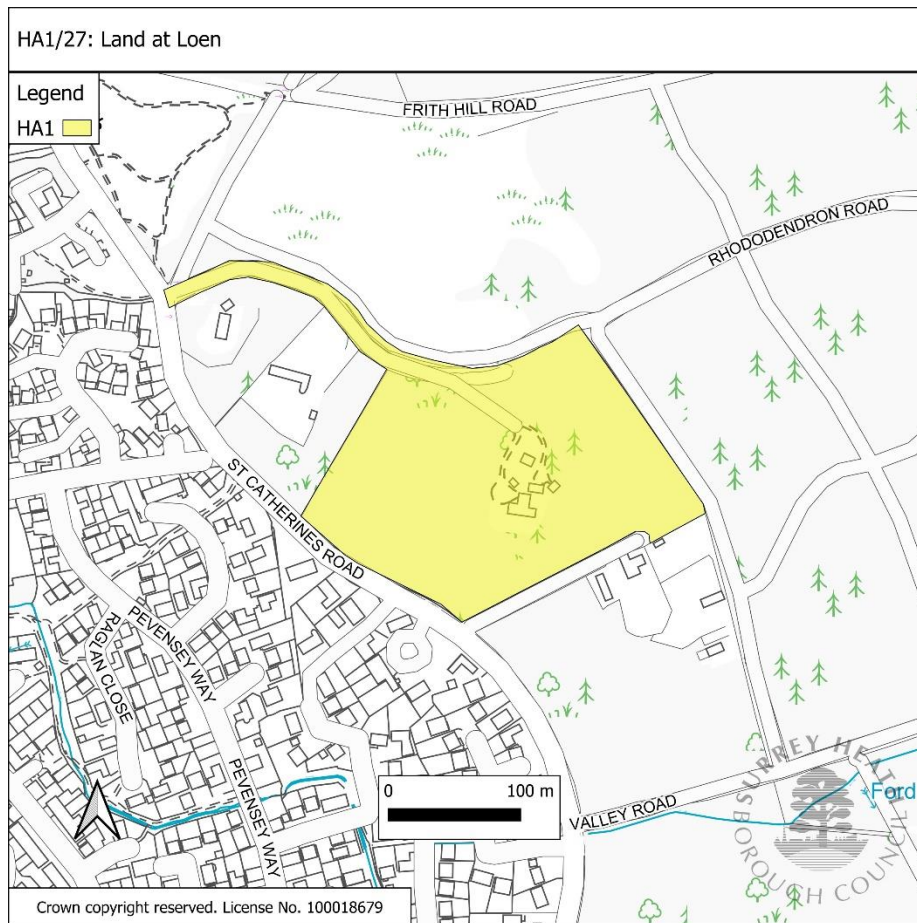
HA1/27 - Land at Loen, St Catherines Road, Deepcut

- 1) Land at Loen, St Catherines Road is allocated for an extra care development (C2) comprising 60 net homes and supporting facilities.
- 2) Development proposals are required to:
 - a) demonstrate that the proposal utilises high-quality, contemporary materials to create a unique character to the site which responds sensitively to the woodland character.



Policy HA1: Housing allocations

- b) demonstrate that the relationship of the built environment to the landscape has been taken into account and the transition from rural to urban character is reflected in the design of development proposals.
- c) retain and enhance the existing trees within the site as far as reasonably practicable.
- d) deliver a high-quality, design-led re-development scheme that is sympathetic to the green, rural character of the area.
- e) biodiversity should be considered at an early stage in the planning process and incorporated into site masterplanning from the outset.



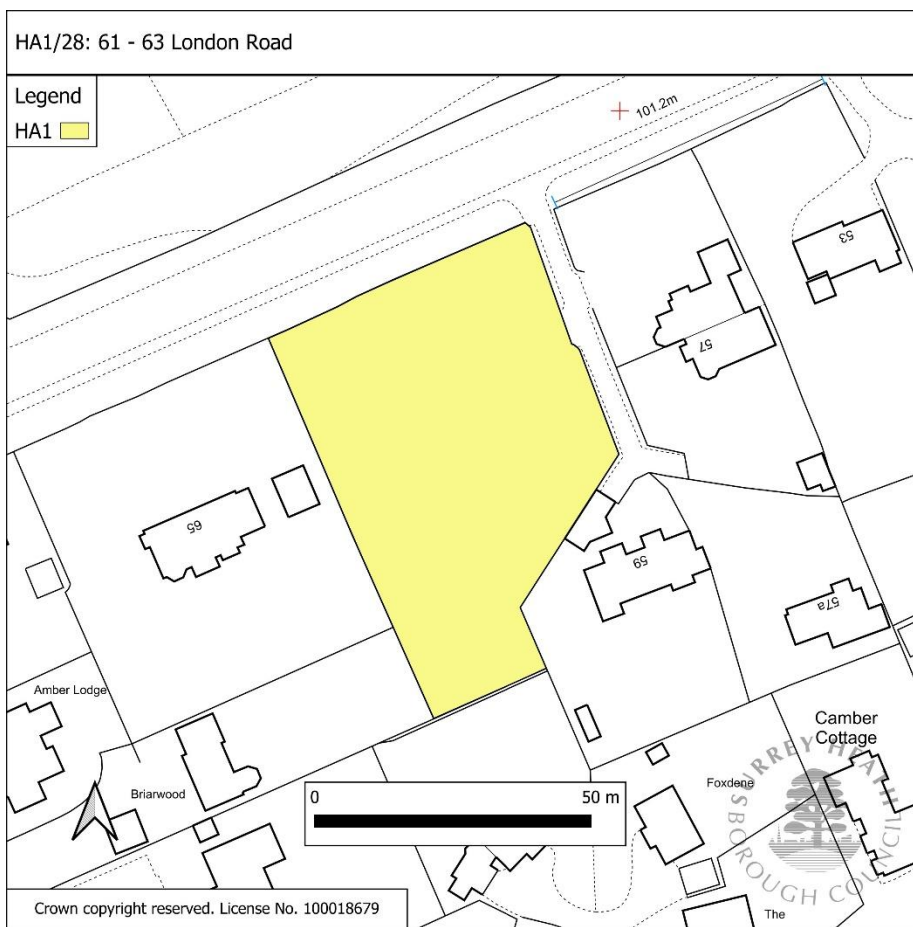
HA1/28 – 61 – 63 London Road, Camberley

- 1) 61 – 63 London Road is allocated for a care home development (C2), comprising 32 net homes (C3 equivalent) and supporting facilities.



Policy HA1: Housing allocations

- 2) Development proposals are required to:
- a) be sympathetic to and integrate with the design of surrounding development.
 - b) retain and enhance the existing trees within the site as far as reasonably practicable.
 - c) provide high-quality, usable communal amenity spaces.
 - d) incorporate high-quality landscaping, retaining and enhancing the existing treed character of the site's boundaries, which contributes to local distinctiveness.



- 3.10. Spatial Strategy Policy SSI sets out the Borough's housing supply position, demonstrating how the local housing need will be delivered over the plan period (2019 – 2038). Policies HA1, HA2, HA3, and HA4 identify the main opportunities for the development of housing within the Borough. The remainder of the local housing need will be delivered on sites identified through the Council's Strategic Land Availability Assessment, including windfall development sites, which will be updated regularly throughout the plan period.
- 3.11. The Council's Spatial Strategy seeks to make the most effective use of previously developed land in sustainable locations. Strategic housing allocations are identified in Camberley Town Centre and at Mindenhurst, the former Princess Royal Barracks in Deepcut. Allocated sites have been assessed within the Council's Sustainability Appraisal throughout the plan-making process. These assessments have informed the identification of site-specific considerations for developers.
- 3.12. The information set out against each proposed allocation is not a formal development brief. Any proposals coming forward on these sites will be assessed against all Local Plan policies and other material considerations relevant at the time of application. The Council may require developers to provide more information or include measures that are not specifically identified within the allocation policies.

Policy HA2: London Road Block Site Allocation

- 3.13. The London Road Block is a key brownfield development site within Camberley Town Centre, which provides an opportunity for a major, residential-led regeneration scheme. The site is being promoted by Surrey Heath Borough Council for regeneration to revitalise an underutilised area of Camberley Town Centre by providing a contemporary, sustainable, mixed-use development, with an attractive and accessible public realm.
- 3.14. Centrally positioned within Camberley Town Centre, south of London Road (A30), between Park Street and the High Street, the site comprises a number of buildings fronting London Road, the High Street, and Park Street. The site has historically accommodated retail and food and drink uses, with some residential accommodation above the ground-floor level but has been underutilised for a number of years. The site also includes the northern part of The Square shopping centre, focused on Obelisk Way, and the associated service and parking areas.
- 3.15. 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. The London Road Block 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.



Policy HA2: London Road Block, Camberley Town Centre

Site area: 1.9ha

- 1) The London Road Block site is allocated for a new, residential-led urban quarter within Camberley Town Centre containing a mix of uses with a contemporary, sustainable and distinctive building design, whilst reinforcing and complementing the established surrounding town centre areas.
- 2) Development proposals are required to accord with a masterplan for the site that is agreed by the Council.
- 3) Development proposals are required to provide:

Mix of Uses

- a) approximately 550 new homes (gross) with a minimum of 20% affordable housing and otherwise in accordance with Policy H7;
- b) an appropriate mix of homes having regard to the need to provide predominantly flatted development;
- c) an appropriate mix of commercial, retail, leisure, cultural, civic and community uses appropriate for the town centre location, with active frontages at ground floor level as appropriate, to support the viability and vitality of Camberley Town Centre;

Design

- d) a high quality public realm that is coherent, inclusive, safe and attractive, reinforcing local distinctiveness, improving permeability, and creating a positive sense of place;
- e) new public open space for everyone to enjoy providing a variety of scale and character, designed with high-quality, durable materials;
- f) integrated green infrastructure throughout the site, including significant landscaping, which incorporates high-quality tree-planting and vegetated areas, and both private garden and public amenity space and recreational play provision in accordance with the Council's adopted standards;
- g) measures to incorporate a green urban environment, including wildlife habitat creation and enhancements in appropriate locations within the development;
- h) an enhanced gateway into Camberley Town Centre from London Road;
- i) a development of high quality architectural standards, of appropriate scale, height and massing with a range of building height of 4 – 7 storeys, incorporating up to two landmark buildings with a maximum building height of 15 storeys, taking into account external views from the flatted development;



Policy HA2: London Road Block, Camberley Town Centre

- j) buildings on the High Street frontage, which complement the historic Edwardian and Victorian character of this part of the town centre;
- k) appropriate rainwater management, integrated with landscape design to visually and environmentally enhance the public and private realm;
- l) net zero carbon design, including on-site renewable energy and/or decentralised energy generation.

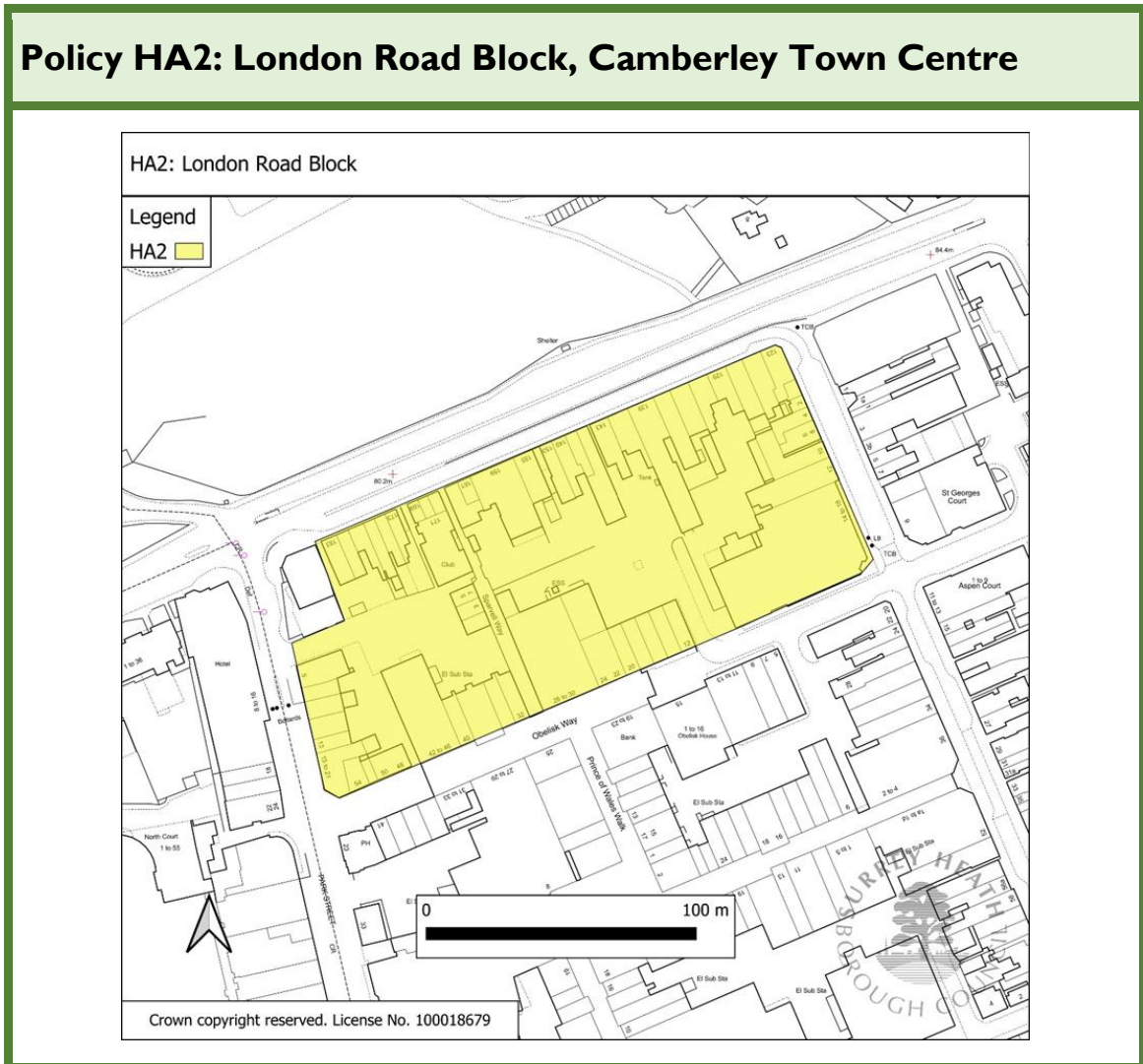
Transport Infrastructure

- m) a better experience for all transport modes in the town centre, in particular for walking and cycling to include improved pedestrian accessibility between the High Street, Park Street, London Road and The Square shopping centre;
- n) improved transport infrastructure at the London Road gateway including provision of a new bus stop, improved pedestrian and cycle links along the London Road and potential provision of a taxi rank and/or short-stay drop-off/pick-up point in addition to on-street disabled parking;
- o) improvements to the London Road junctions with the High Street and Park Street and the creation of pedestrian friendly areas adjacent to Obelisk Way and the High Street;
- p) appropriate accesses for service vehicles that are convenient for use but designed discreetly to ensure they do not detract from the attractiveness of the new development;
- q) suitable, well integrated parking provision having regard to Surrey County Council's parking standards.

Figure 4 – Allocation Site Map



Policy HA2: London Road Block, Camberley Town Centre



- 3.16. The redevelopment of the London Road Block site provides an opportunity to deliver a new town-centre community within a landmark development that forms the northern gateway to Camberley Town Centre. Given the scale of the site, site-wide master planning and Design Codes should be prepared in consultation with the Council and agreed prior to the submission of a planning application.



- 3.17. Towns, high streets, and shopping centres, across the UK have faced challenges for over a decade from falling market demand, rising occupancy costs and increasing competition from online and out-of-centre shopping. These trends have been further accelerated and compounded by the COVID-19 pandemic. Consequently, the Town Centre Uses and Future Directions Study identified that having regard to existing commitments and vacant floorspace, there is no potential capacity ('need') for new retail (convenience and comparison goods) floorspace.
- 3.18. The redevelopment of the London Road Block therefore provides an opportunity to condense the existing retail floorspace with the provision of high-quality units over a reconfigured footprint. Given the conclusions of the Future Directions Study, the site offers an opportunity to maximise residential provision in the Town Centre to improve its vitality and viability, whilst providing appropriate synergistic main town centre land uses.
- 3.19. Regeneration of this site should seek to deliver approximately 550 (gross) new homes, with a minimum of 20% of these being affordable. The mix of new homes delivered through this redevelopment scheme should reflect the evidence as set out in the most up-to-date Local Housing Needs Assessment (see Policy HA5: Range and Mix of Housing). However, this should be balanced with the recognition of the sustainable location of the site and the need to optimise land use. Therefore, residential development should largely comprise flatted development.
- 3.20. Although predominantly residential, the development of this site provides an opportunity to build a new community and incorporate a mix of town-centre uses that would create a vibrant new quarter in the heart of the town. To achieve this, development proposals should incorporate appropriate town-centre uses at ground floor level throughout the development, including; office and/or flexible co-working floorspace, professional, financial and institutional services, new restaurants, cafés and cultural and civic services/amenities. This will assist with the consolidation of the range of retail, commercial, and civic amenities offered within Camberley Town Centre.
- 3.21. Development proposals should also deliver excellent new public open space, to be enjoyed by the new community and those who live in, work in, and visit Camberley Town Centre. Additionally, car and parking facilities, including the provision of electric vehicle charging points must be provided in line with the Surrey County Council parking standards.
- 3.22. The London Road frontage of the site should be enhanced, providing an attractive and distinct new northern gateway to the Town Centre, characterised by high quality, contemporary architecture, well integrated placemaking and urban greenery.



- 3.23. The existing town centre is dominated by The Square shopping centre, which closes in the evening, making it difficult to travel on foot between the Atrium at Park Street and the High Street, which are the two main areas offering evening dining, leisure and entertainment. The redevelopment of the London Road Block provides opportunities to improve connectivity between these two areas. New streetscape improvements should support improved permeability throughout, providing a coherent, pedestrian friendly street network and easy access to local green areas, parks and leisure facilities.
- 3.24. Optimising the development of this town-centre site, buildings should broadly range from 4 to 7 storeys in height, in accordance with the relative character of the different areas surrounding the site. Additionally, two landmark buildings of up to 15 storeys could be incorporated at key, central locations within the site to create a focal point as seen from London Road.
- 3.25. The streetscape within and adjoining the site will need to be enhanced by high quality hard and soft landscaping and robust tree planting including provision of landscaping between the development and London Road. Flexible public open space should also be provided, with the capacity to accommodate a range of activities such as farmer's markets, public exhibitions and community and cultural events.
- 3.26. Camberley High Street retains elements of the original Victorian and Edwardian character of Camberley as a late 19th century settlement adjoining the Royal Military Academy. Development within the vicinity of this historic road should respect and complement its surrounding environment.
- 3.27. Development should have regard to the proposed pedestrian and cycle improvements set out in the Surrey Heath Local Cycling and Walking Infrastructure Plan. Along London Road, and subject to discussion with the Borough Council and Surrey County Council improvements should include separate pedestrian and cycle lanes and a new, additional bus stop, drop off points and/or taxi ranks close to the northern gateway site entrance. Pedestrian and cycle linkages should also be provided to nearby green spaces such as Camberley Park and The Obelisk. These linkages should provide connectivity to the new green corridor that will be delivered as part of Surrey Heath's wider green network, connecting the central core of the town centre to the valuable green spaces surrounding site allocation HA3, Land East of Knoll Road.
- 3.28. Developers should demonstrate how they will involve the local community in the construction, for example by engaging apprentices and arranging training schemes in construction, and engaging local artists and local colleges in the development of public art.



- 3.29. New development at the site will be required to be net zero including consideration for on-site renewable energy provision, decentralised energy generation, or a combination of both measures. The submission of an Energy Statement demonstrating how this will be achieved in the proposal must be submitted as part of the proposal for the site’s redevelopment.
- 3.30. Rainwater management will need to be provided at the site through the implementation of measures such as swales, green roofs, balancing ponds, reed beds, permeable paving and water butts. It will be necessary for this to be integrated within the site’s landscaping and natural environment, providing green infrastructure which visually and environmentally enhances the site.
- 3.31. The development should deliver a green urban environment, which provides environmental and ecological benefits and a biodiversity net gain. To facilitate this, consideration should be given to the provision of tree planting and vegetation within public areas; green courtyards in semi-private or private residential areas; and green roofs, green walls and roof gardens in both public and private areas. The establishment of a green urban environment will also provide opportunities for wildlife habitat creation and the ecological enhancement of the site. Measures to encourage wildlife should include the provision of bird boxes, bat boxes, swift bricks and beehives at appropriate public and private locations within the development.

Policy HA3: Land East of Knoll Road Site Allocation

- 3.32. The ‘Land East of Knoll Road’ site is a 1.3 hectare site, located on the eastern edge of Camberley Town Centre. The site comprises predominantly brownfield land, with some areas of open green space. Existing buildings within the site comprise a mix of civic, institutional, and community uses including Surrey Heath Borough Council’s offices and Camberley Library.
- 3.33. Surrey Heath Borough Council and Surrey County Council are the landowners of the site. Given the sustainable town-centre location, the site provides a key opportunity to regenerate an underutilised area of publicly owned land for a residential-led development with supporting infrastructure.

Policy HA3: Land East of Knoll Road, Camberley Town Centre

Site area: 1.3 ha

- 1) The site is allocated for comprehensive, residential development to create a vibrant new residential quarter within Camberley Town Centre creating a strong sense of



Policy HA3: Land East of Knoll Road, Camberley Town Centre

place with a distinctive and attractive living environment.

- 2) Development proposals are required to accord with a masterplan for the site that is agreed by the Council.
- 3) Development proposals are required to provide:

Housing

- a) approximately 340 new homes (gross) with a minimum of 25% affordable housing and otherwise in accordance with Policy H7;
- b) 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;

Design

- c) flatted development across the site comprising 4 – 7 storeys, reflecting the urban character of the area;
- d) high-quality public realm throughout the site, which provides improved permeability from Camberley Park to the town centre, including traffic calming measures through design and surfacing changes to provide a pedestrian and cyclist friendly environment;
- e) Provide high-quality, useable private and communal amenity spaces.
- f) an attractive new streetscape throughout the site, which utilises hard landscaping to differentiate pedestrian, cyclist, and vehicular zones, and soft landscaping incorporating mature tree planting and vegetated areas;
- g) the protection and enhancement of the setting of the Grade II Listed Obelisk within a wooded part of Camberley Park;
- h) a net zero carbon design including on-site renewable energy and/or decentralised energy generation;
- i) appropriate rainwater management measures integrated with landscape design to enhance the site visually and environmentally.
- j) vehicular accesses to the site from Knoll Road to the west and Hillside to the southeast;
- k) improved pedestrian and cyclist links between the site and Camberley High Street, and Camberley Station, with suitable crossing points implemented at Knoll Road;
- l) the retention of existing bus stops at Knoll Road and support for accessible



Policy HA3: Land East of Knoll Road, Camberley Town Centre

and well-connected bus services to Knoll Road; well-integrated car and cycle parking provision in accordance with Surrey County Council's parking standards and reflecting the town centre location;

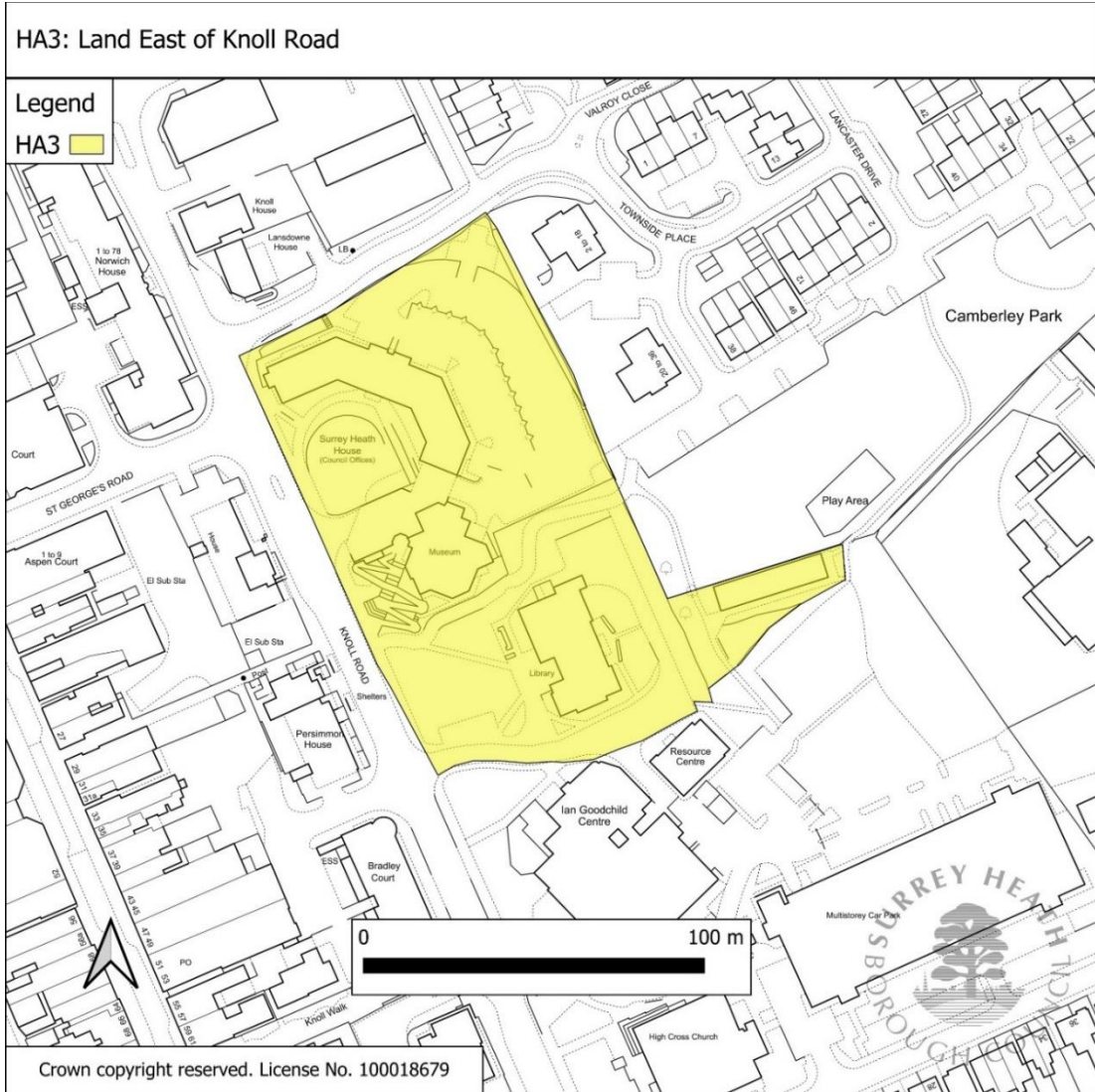
Green Infrastructure

- m) integrated green infrastructure throughout the site, including significant landscaping, which incorporates high-quality tree-planting and vegetated areas, and both public and private garden amenity space and recreational play provision in accordance with the Council's adopted standards;
- n) measures to incorporate a green urban environment, including wildlife habitat creation and enhancements in appropriate locations within the development
- o) a green corridor linking Camberley Park and The Obelisk, to Knoll Road supported by a strong green landscaping buffer along Knoll Road including mature tree planting;
- p) the retention and expansion of the play facilities at Camberley Park including woodland trails, an equipped play area and open space.

Figure 5 – Allocation Site Map



Policy HA3: Land East of Knoll Road, Camberley Town Centre



- 3.34. 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 in consultation with the Council and agreed prior to the submission of a planning application.
- 3.35. Land East of Knoll Road 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 new development will have a high quality and cohesive public realm. 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 characterised by mature tree planting, vegetation, grassland and other appropriate types of green infrastructure.
- 3.36. Development adjoining Camberley Park and the wooded areas of the site will need to be sensitive to the green and tranquil character of these localities. The streetscape design in proximity of these areas should therefore incorporate soft landscaping and tree planting to reflect this. To retain and enhance the setting of The Obelisk, the layout and massing of residential development should support enhanced sightlines towards this statutory heritage asset from other areas of the town centre.
- 3.37. A green frontage along the eastern side of Knoll Road should be retained and enhanced with additional tree planting.
- 3.38. To make efficient use of land in a sustainable town centre location, flatted residential development up to 7 storeys will be supported in the area adjoining Knoll Road. The mix of homes should, subject to site constraints, have regard to the findings of the Local Housing Needs Assessment (see Policy H5).
- 3.39. Improvements to the streetscape of Knoll Road and connecting streets are required to reduce the speed of traffic, increase safety for pedestrians and cyclists, and to create a more pedestrian friendly townscape character that is less car dominated. The streetscape design should also enhance visual and physical connectivity to Camberley High Street and Camberley Station, where possible.



- 3.40. 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, for visitors and residents to enjoy.
- 3.41. Parking provision should reflect the town centre location and will need to be in accordance with Surrey County Council's parking standards.
- 3.42. Sustainable development, which takes account of layout, orientation of buildings, sunlight, daylight, technical specifications and materials to increase energy efficiency and reduce energy and water consumption will be expected. Development should also demonstrate a high quality architectural design with a distinctive, attractive and functional living environment and a sensitive design response to the local context including the topography of the site, which rises to the east. The street layout and pattern should be designed so that it enables permeability throughout the site and to adjoining areas for pedestrians and cyclists.
- 3.43. New development at the site will be required to be net zero including consideration for on-site renewable energy provision, decentralised energy generation, or a combination of both measures. The submission of an Energy Statement demonstrating how this will be achieved in the proposal must be submitted as part of the proposal for the site's redevelopment.
- 3.44. Rainwater management will need to be provided at the site through the implementation of measures such as swales, green roofs, balancing ponds, reed beds, permeable paving and water butts. It will be necessary for this to be integrated within the site's landscaping and natural environment, providing green infrastructure which visually and environmentally enhances the site.
- 3.45. In addition to existing green spaces at the site which will be retained, a green urban environment will need to be provided as part of the development, contributing to the character of the area and helping to achieve overall biodiversity net gain. Urban greening will help to provide both environmental and ecological benefits at the site. The inclusion of measures such as green roofs and green walls, alongside both public and private garden amenity spaces will be encouraged.



Policy HA4: Mindenhurst, Deepcut Site Allocation

- 3.46. The former Princess Royal Barracks has been declared surplus to requirements by the Ministry of Defence. The site was allocated in the adopted Surrey Heath Core Strategy, 2012 with planning permission granted for a hybrid scheme of 1200 new homes and associated infrastructure in 2014.
- 3.47. Now known as Mindenhurst, the site represents a substantial opportunity for residential-led redevelopment in the Borough, providing a new community together with new infrastructure and amenities. This strategic site will expand the established rural settlement of Deepcut and increase the provision of local facilities and services at the village creating a new community that is vibrant, sustainable, comprehensive and well designed. The wording of Policy HA4 reflects the fact that development has commenced with some key infrastructure requirements already delivered or with planning permission.

Policy HA4: Mindenhurst, Deepcut

- 1) The former Princess Royal Barracks as defined on the Policies Map is allocated for 1,200 new dwellings, a care home and associated infrastructure.
- 2) The continued development of the site will be supported where development meets the following criteria:
 - a) Delivery of a safe and high quality environment reflecting the rural nature of Deepcut's setting and the parameters of the hybrid permission 12/0546 (or as amended) and the approved design codes and the adopted Deepcut SPD;
 - b) 15% of housing to be provided as affordable housing on those parcels where affordable housing is to be delivered as agreed under application reference 21/0004/DTC subject to the review mechanisms set out in that permission;
 - c) A housing mix to reflect the approved density plans and having regard to the identified need in accordance with Policy H5 (Range and Mix of Housing);
 - d) The provision of retail and associated town centre uses in accordance with hybrid permission 12/0546 (or as amended) to create sustainable shopping patterns, complementing or extending the existing Neighbourhood Centre at Deepcut;
 - e) Phased delivery, or where otherwise agreed, funding for social, physical and community infrastructure, including health, education, library and formal and informal sports facilities;
 - f) Physical infrastructure that is climate change resilient, in particular, addressing the issue of ground and surface water flood risk and making provision for electric vehicle charging or other suitable technologies that arise through the plan period;



- g) Agreed measures for on-going maintenance for surface water drainage systems within the development including provision of financial contributions where appropriate;
- h) New non-residential development shall achieve efficient use of resources, and reach a 'Very Good' BREEAM status as a minimum;
- i) Measures to reduce the impact of traffic upon and arising from Deepcut which will include reducing demand for travel, improved public transport provision, a safe integrated footpath/cycle route network linking to neighbouring settlements and key services and improvements to the surrounding highway network and other measures as set out in the Transport Assessment accompanying the approved application and improvements and contributions set out in the Section 106 agreement and subsequent amendments;
- j) Measures to avoid new development having an impact upon designated European Sites comprising on site SANG and a contribution towards Strategic Access and Management Monitoring Measures;
- k) Measures to avoid new development having an impact upon the features and sites of local importance for biodiversity and delivery of a net gain in biodiversity in line with Policy E3;
- l) Maintain the countryside gaps between Deepcut and Heatherside, Deepcut and Pirbright and Deepcut and Frimley Green;
- m) Delivery of a green infrastructure network to support improved connectivity and to include formal public open space, allotments and informal open space, including Suitable Alternative Natural Green Space (SANGs);
- n) Enhancement of the setting of and improved linkages to the Basingstoke Canal from the development and the wider area;
- o) Preserves or enhances the character and setting of heritage assets including the Basingstoke Canal Conservation Area and St Barbara's Church.

3.48. The former Princess Royal Barracks at Deepcut was allocated as a residential-led mixed use scheme in the Council's Core Strategy Development Plan Document (2011-2028). The adopted Deepcut SPD (2011) sets out guidance on density, character areas, materials and other design matters. It includes the following Vision for the site:

The Deepcut area will accommodate a sustainable expanded settlement formed out of the former PRB site and the existing Deepcut village. This will be distinct and separate from the urban areas to the west and north but linked to them in a sustainable manner.



The expanded Deepcut will be characterised by the rural heathland landscape within which it sits. Open space will thread through the built-up area, as well as providing much of the setting of the village. The Basingstoke Canal will play a more significant role providing a recreational and landscape resource and a major walking and cycling link to nearby centres and rail facilities. The expanded settlement will be a socially vibrant community supporting a sustainable lifestyle, where occupants can live, work and play whilst allowing for organic change and flexibility. The quality of design and the general environment will be high, reflecting a contemporary interpretation of Surrey village patterns, incorporating local features of character, especially those having a military or canal association, as well as reflecting the heathland setting.

- 3.49. A hybrid Planning Permission was granted in 2014 (application no. 12/0546) for 1,200 residential units and other uses including retail and community facilities, and public open space. All Reserved Matters are required to be submitted by April 2024. The community facilities include a replacement church hall, a sports hub and a public house with significant new green infrastructure comprising allotments, formal and informal open space and Suitable Alternative Natural Greenspace. The scheme also provides access improvements to the Basingstoke Canal.
- 3.50. Since 2014 there have been a series of S73 applications and Non-Material Amendments providing alterations to the scheme as originally submitted. The Phase I Reserved Matters and site wide Design Codes were approved in 2016 and development of the first residential units at the site commenced during the monitoring year 2018-19. Further phases of the development, including supporting infrastructure, have been approved, with delivery to date including a two form entry Primary School and nursery, a public house, green infrastructure and SANGs and highway improvements.
- 3.51. The majority of the remaining development will take place in the first 10 years of the plan period with further information on delivery set out in the Housing trajectory in Appendix 2. Further information on the phasing of infrastructure is set out in the Surrey Heath Interim Infrastructure Delivery Plan. Delivery of infrastructure to support the development will either be on or off site (such as the primary school) or through financial contributions for improved capacity off site and/or for on-going infrastructure maintenance, such as for surface water drainage systems.
- 3.52. Affordable housing on the remainder of the site will be delivered in accordance with the Affordable Housing Strategy approved under application reference 21/0004/DTC which includes review mechanisms.



Policy H5: Range and Mix of Housing

- 3.53. A key task for the Local Plan is to provide a policy framework that will deliver housing that meets all needs in the local population. New residential development offers the opportunity to provide a range of housing supporting the varied needs present within the community of Surrey Heath, maintaining and expanding the choice of homes available. This should enable residents to stay in their local area as their housing needs change, and help to build balanced and mixed communities.
- 3.54. New residential developments must take account of local need and should deliver a wide choice of high quality homes including homes for families, older people, people with disabilities and provision for those wishing to build their own homes. Homes should also be adaptable for changing needs over time and contribute to improvements to the overall quality of the housing stock in Surrey Heath.

POLICY H5: Range and Mix of Housing

- 1) Residential development will be permitted which contributes to a mix of tenure, type and sizes of dwellings to meet local needs, where the following criteria are met:

General Housing Mix

- 2) The dwelling mix of tenure, type and number of bedrooms takes account of the housing needs set out in the Housing Need Assessment 2023 or any subsequent update.
- 3) The dwelling mix reflects the size, characteristics and location of the site;

Accessible and Adaptable Homes

- 4) All dwellings will be required to be built to appropriate accessible and adaptable standards to meet Building Regulations Part M4(2), or as subsequently amended, unless it can be robustly demonstrated it would not be possible to do so due to site-specific circumstances.
- 5) On sites of 20 or more net new dwellings, at least 5% (rounded to the nearest whole unit) of new homes and 10% of affordable homes will be required to meet Building Regulations Part M4(3)(2)(a) for wheelchair adaptable housing, unless it can be robustly demonstrated it would not be possible to do so due to site-specific circumstances. Where evidence from the Council's Housing Register identifies a current local need, affordable housing will be expected to meet Part M(4)(3)(2)(b) wheelchair accessible housing.

Self-Build and Custom Housebuilding

- 6) Development proposals for 20 or more net new dwellings will be expected to make



available 5% (rounded to the nearest whole unit) of the total homes for sale as serviced plots for self-build and custom housebuilding, whilst there is an identified need on the Surrey Heath Self-Build and Custom Housebuilding Register for this type of housing in the Borough, unless it would not be possible due to site-specific circumstances.

- 7) The development is for standalone self-build or custom build homes or community-led housing in appropriate locations within settlement areas.

Build to Rent Homes

- 8) Development for build to rent will be permitted where the following criteria are met:
 - a) are suitably located;
 - b) meet an identified local demand;
 - c) include provision of a minimum 20% affordable private rented accommodation; and,
 - d) provide tenancy agreements for renters for a minimum of three years with a break clause which allows the tenant to end the tenancy with a month's notice any time after the first six months and which include defined in-tenancy rent reviews that are clearly set out.
- 9) The affordable private rented dwellings must meet the requirements set out in the [government's planning guidance](#) for build to rent homes, including a minimum discount of 20% below market values for the same or equivalent property. The affordable private rented housing must be provided in perpetuity (in accordance with the [Perpetuities and Accumulations Act 2009](#));
- 10) All build to rent schemes should be secured in single ownership providing solely for the rental market for a minimum 20 year term with provision for clawback of affordable housing contributions should the covenant not be met.

- 3.55. The types, sizes and tenures of homes required to meet the needs of the local community have been assessed in the [Local Housing Needs Assessment](#) 2024. The housing mix should be informed by this evidence and the other criteria set out in Policy H5. The Local Housing Need Assessment indicates there is a need for the following mix of dwelling sizes and types in Surrey Heath over the period 2019-2040.



Table 5 – Indicative Mix of Housing by Size and Tenure in Surrey Heath

Type of Tenure	1-bed	2-bed	3-bed	4+-bed
Market	5%	35%	35%	25%
Affordable Home Ownership (Intermediate Housing)	20%	45%	25%	10%
Affordable Housing (rented)	30%	30%	30%	10%

- 3.56. Where the housing need evidence for Surrey Heath is subsequently updated, this will supersede the existing Housing Needs Assessment and should instead be referred to for guiding the housing mix in Surrey Heath, in accordance with Policy H5.
- 3.57. Proposals for development should demonstrate that the proposed mix of homes will deliver a balanced mix of dwelling sizes, types and tenures to meet projected future household need within Surrey Heath. An appropriate housing mix will also have regard to site-specific factors such as the size, characteristics, and location of the proposed development site.

Accessible and Adaptable Homes

- 3.58. Different types of homes are required to provide accommodation that meets people's changing needs over time, enabling people to stay in their homes for longer. This includes accessible and adaptable accommodation, and homes that offer improved safety and support taking account of people's diverse needs and requirements. It is vital to plan for the delivery of such homes, as the Local Housing Need Assessment 2024 indicates that by 2040, the number of people over the age of 65 in Surrey Heath will increase by 42% and there will also be significant increases in the number of people with disabilities.
- 3.59. In October 2015, part M (Volume 1) of the Building Regulations was introduced, which relates to the access and use of dwellings. The regulations include a mandatory requirement M4(1) Category 1 which sets out minimum access standards (visitable dwellings). In addition, there are optional requirements for higher access standards: M4(2) Category 2 for accessible and adaptable dwellings and M4(3) Category 3 for wheelchair user dwellings. Within Category 3, there is a differentiation between wheelchair adaptable dwellings (M4(3)(2)(a)) and wheelchair accessible dwellings (M4(3)(2)(b)).



- 3.60. The national Planning Practice Guidance (PPG) requires planning policies to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing, where identified need exists (Paragraph: 009. Reference ID: 63-009-20190626). [The Housing Needs Assessment 2024](#) identifies a need for all residential development to meet Building Regulations M4(2) standard and the Government has recently announced changes to the Building Regulations to make this a mandatory requirement with certain exemptions. The HNA recommends around 5%-10% of homes to meet M4(3) standard, which this policy applies to the M4(3)(2)(a) standard specifically. The PPG states that local plan policies for wheelchair accessible homes (M4(3)(2)(b)) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (Paragraph: 009. Reference ID: 56-009-20150327). Therefore, it will be determined on a case by case basis, with reference to the housing register, whether any of the affordable homes meeting M4(3)(2)(a) should be built to a wheelchair accessible dwellings standard (M4(3)(2)(b)).
- 3.61. Policy H5 sets accessible and adaptable standard requirements to ensure a sufficient choice of accommodation is available in the market for people with particular needs. Meeting Building Regulations requirements M4(2) and M4(3) will normally be controlled through the use of a planning condition. As required by the PPG, site specific circumstances will also be taken into consideration where applying the accessible and adaptable homes requirement of Policy H5.

Self-Build and Custom Housebuilding

- 3.62. As required by the Self-Build and Custom Housebuilding Act 2015 (or subsequently amended legislation) the Council maintains a register of individuals or interested associations that are seeking a plot of land to construct a self-build or custom build house as a sole or main residence.
- 3.63. The need to grant planning permission for self-build and custom-build homes is measured from the number of entrants on Part I of the Council's Self-build and Custom-Housebuilding Register. Entrants to the Self-Build and Custom Housebuilding Register must meet the Council's Local Connection Test and Financial Solvency Test in order to be eligible for inclusion on Part I of the Register.



- 3.64. To help deliver a wide choice of accommodation, on-site proposals for 20 or more net new dwellings, developers are expected to deliver 5% of net new dwellings as serviced plots for self-build and custom housebuilding. Proposals for the delivery of additional serviced plots are encouraged and will be supported. Proposals which do not satisfy this requirement may be supported based on site suitability considerations such as site-specific physical or environmental constraints, to be considered on a case by case basis, or where this is justified in relation to evidence of identified housing need or viability.
- 3.65. Where an applicant considers that it is not feasible or viable to meet the requirement for serviced plots for self-build or custom housebuilding, the Council will expect this to be demonstrated with robust evidence and may negotiate a proportion which is achievable. The Council will negotiate the mix of self and custom build plots to be made available as informed by the Council's Self Build and Custom Housebuilding Register. Where a plot has been advertised for a reasonable price and marketed effectively for at least 12 months but has not sold, the plot shall be offered to the Council or a registered provider before being built out by the developer for market housing. Serviced plots will be secured and released by Section 106 agreements. The Council would expect details of sales particulars, where and with whom the serviced plots have been advertised, details of interest in the serviced plots, and why interested individuals discounted purchasing a serviced plot.
- 3.66. Applications for self-build and custom-build developments should demonstrate high-quality design and be sensitive to the characteristics of the local area. On sites where more than one self-build or custom-build dwelling is proposed, a design framework should be submitted as part of the planning application.
- 3.67. Self-build and custom housebuilding are recognised to provide opportunities to deliver affordable homes. Proposals from community-led groups and organisations as defined in Annex 2 of the NPPF 2023 will be supported where possible. In accordance with the NPPF 2023, community-led housing will be supported on exception sites that would not otherwise be suitable as rural exception sites.

Build to Rent Homes

- 3.68. Build to rent homes comprise purpose built housing that is typically 100% rented out including housing available for private rent and housing for affordable private rent, as defined in the [planning guidance for build to rent homes](#). The private rented sector housing provided through build to rent schemes meets the housing needs of residents who cannot afford to buy or do not want to buy private homes. Private rented sector housing also meets the needs of residents who cannot get access or whose preference is not to live in other types of affordable housing or subsidised housing in Surrey Heath.



- 3.69. Build to rent scheme operators will be required to offer tenancies of a minimum of three years to all tenants in the development who are eligible to live in the United Kingdom for that period. A planning condition for the minimum tenancy period will be put in place where planning permission is granted for a build to rent development. This will apply to all tenants including those paying market rent or affordable private rent.
- 3.70. Affordable Private Rent Housing delivered as part of build to rent schemes will need to be set at a level that is at least 20% less than the private market rent (inclusive of service charges) for the same or equivalent property. Build to rent developers should assess the market rent using the definition of the International Valuations Standard Committee as adopted by the Royal Institute of Chartered Surveyors.
- 3.71. It is necessary that build to rent schemes provide rental accommodation for a minimum period of time, to help ensure that the need for private rental housing in Surrey Heath can be met during the plan period. Accordingly, the Council will require planning applications for build to rent housing to agree to a covenant that ties the development to providing solely private rented accommodation for a minimum period of 20 years. This does not apply to the affordable private rent housing which is to be provided in perpetuity.
- 3.72. A charge towards the provision of additional affordable private rented housing will be triggered where any private rented homes are sold at the development within 20 years of occupation of the completed development. This will be included as a clawback mechanism in the form of a Section 106 agreement as part of any planning permission granted for build to rent housing.

Policy H6: Specialist Housing

- 3.73. It is important that people who choose to live fully independently can continue doing so for as long as they are able to. Improvements to the accessibility of standard homes through accessible and adaptable home requirements as set out in Policy H5 will help enable people to live independently for longer.
- 3.74. However, for some of the Borough's population, it is necessary to relocate to more specialised types of housing, suited to their specific needs and requirements. Specialist housing is accommodation that is designed for older people, disabled people, and vulnerable people with specific housing needs. A sufficient choice of suitable and appropriate specialist housing should be provided, that meets the varying levels of need for these different groups within the community of Surrey Heath.



POLICY H6: Specialist Housing

- 1) Proposals for the development of specialist housing including suitable supported or extra care housing and registered bed spaces in residential care homes will be permitted, provided they:
 - a) meet the identified needs of older people and households with specific needs that are evident at the time of the proposal;
 - b) are supported by the appropriate authorities responsible for primary health care and social care provision, taking account of the increased demands associated with the proposal's occupiers;
 - c) will be suitable for the intended occupiers having regard to the quality and type of facilities, the level of independence and the provision of support and/or care;
 - d) will be accessible to local shops, services, public transport and community facilities, where appropriate to the needs of the intended occupiers;
 - e) will not result in the over-concentration of specialist housing in a particular locality, leading to a material change in character; and,
 - f) will not have a detrimental impact on the vitality or viability of Camberley Town Centre, where the proposal is located in or adjacent to the Town Centre.
- 2) The mix of tenures negotiated by the Council will have regard to advice from the appropriate authorities responsible for primary health care and social care provision, as necessary.
- 3) Where viable, sites of 10 or more self-contained specialist homes should deliver an appropriate proportion of affordable homes as evidenced by an independent viability assessment.
- 4) Proposals that would involve a net loss of specialist housing units or bed spaces, will only be permitted where appropriate replacement specialist accommodation will be provided that satisfies the criteria (1) of this policy, or it is demonstrated, using local evidence including the [Local Housing Need Assessment](#), that there is no local need for the existing type of specialist housing to be retained.
- 5) Where permission is granted for specialist accommodation, the Council reserves the right to use a legal agreement to ensure that proposals are retained for their permitted use.



- 3.75. National planning policy and guidance requires planning authorities to plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community, including older people and people with disabilities. Whilst many older people and disabled people will want to remain in their existing homes, for some it will be necessary to move to specialist housing such as supported sheltered housing, or extra care housing. Furthermore, some people are unable to live independently and therefore require a more specialised level of care provided by a residential care home or nursing home.
- 3.76. Specialist housing includes the following types of accommodation:
1. age-restricted general market housing (retirement housing);
 2. sheltered housing (housing with support);
 3. extra care housing (housing with care);
 4. residential/nursing care homes;
 5. supported living for people with learning disabilities and mental health needs; and
 6. supported living for people with other health-related needs.
- 3.77. Extra care housing is a specialist type of housing with care primarily for older people where occupants have specific tenure rights to occupy self-contained dwellings with agreements covering the provision of care, support, domestic, social, community or other services they receive. This type of specialist housing can be deemed either Use Class C2 or C3, dependant on various factors. Factors that will be considered in the determination of the use class classification for extra care developments include the level of facilities proposed at the site, the availability and planning of care and support as a fundamental element of the scheme, the structure of leasehold and rental arrangements for the facilities, and the structure of care provision.
- 3.78. Residential and nursing care homes provide the highest level of care of all specialist housing types considered in this policy. They are regulated as institutions by the Care Quality Commission. The provision of bed spaces in residential care and nursing homes fall within Use Class C2.
- 3.79. This policy sets a requirement that proposals for specialist housing should meet an identified need which is based on the most up-to-date available evidence. The Housing Need Assessment 2024 includes an assessment of need for specialist accommodation in Surrey Heath. The evidence in this study projects the need for housing with care or support adjusted to 2038 as 1116 dwellings of which 658 is for housing with support, and 458 is for housing with care.



- 3.80. Where viable and subject to market conditions, the policy seeks to support delivery of an appropriate, viable proportion of affordable housing on sites of 10 or more self-contained specialist homes, as evidenced by an independent viability assessment. This reflects the need for a more flexible approach to delivery of specialist affordable homes, as set out in the [Local Plan Economic Viability Assessment 2024](#).
- 3.81. The [Local Housing Needs Assessment](#) indicated a surplus of registered care bed spaces in Surrey Heath by 2040. This is evidenced by the demographic projections data set out in the Local Housing Needs Assessment 2024. Adjusted to 2038, there is a shortfall of 217 residential care bedspaces and a surplus of 280 nursing care bedspaces. Registered care bed spaces are generally delivered in residential care homes or nursing homes, which fall within a C2 use class. Regard should also be had to the [specific needs identified](#) by the appropriate authorities responsible for primary health care and social care provision in the Borough upon the submission of planning applications for sheltered housing or extra care housing, and registered care bed spaces. Currently the appropriate authorities in Surrey Heath are Surrey County Council as the Adult and Social Care Commissioner, and the NHS Frimley and NHS Surrey Heartlands Integrated Care Boards as the local commissioners and providers of health and care services. In the light of evidence in the latest LHNA, it is considered unlikely that new proposals for additional nursing care bedspaces would meet policy criterion I(a) requirement to meet local needs.
- 3.82. Proposals for specialist housing types will need to take into account the capacity of the appropriate authorities responsible for primary health care and social care provision to service the needs of residents within such housing and ensure compliance with [The Care Act 2014](#) (or as subsequently amended). It will therefore be expected that such proposals have been informed by discussions with the appropriate authorities so it can be demonstrated to the Council that occupants' needs can be sustainably accommodated. The Council would also encourage applicants to obtain endorsement for the proposal from the appropriate authorities responsible for primary health care provision where care and/or support funding may be required for residents of the scheme from the point of its completion or in future years.
- 3.83. The provision of specialist housing should help build and maintain balanced and mixed communities, and assist people who move to such accommodation to remain in their local area. The concentrated delivery of residential and nursing care homes (Use Class C2) within particular areas is not considered to promote sustainable patterns of development in the Borough and should therefore be avoided. In particular, the concentration of residential care and nursing home developments in or adjacent to town centres can, where the use is self-contained and does not contribute to activity in the town centre, impact on the vitality and viability of the centre. Proposals for development that would result in such a concentration of uses will therefore be resisted.



Policy H7: Affordable Housing

- 3.84. Surrey Heath offers a high quality of life and the [Office for National Statistics](#) (ONS) ranks the Borough as one of the least deprived areas to live in the country. However, the cost of living is high, with the [ONS](#) highlighting that house prices are above the national and South East averages. Correspondingly, buying or renting a home on the open market is inaccessible to many local people. The provision of affordable housing is therefore important to assist in meeting the range of housing needs within the local community.
- 3.85. Policy H7 sets out the affordable housing policy requirements in Surrey Heath, and the thresholds at which these requirements come into effect. The size and type of affordable housing provided should best fit the requirements of those who are in need of affordable housing as set out in the Local Housing Need Assessment 2024, or any subsequent update, and the [National Policy requirement](#) for First Homes.

POLICY H7: Affordable Housing

- l) The delivery of affordable housing will be supported by granting planning permission for development which meets the following requirements:
 - a) On sites of 10 or more dwellings (gross) or a site area of 0.5ha or more delivery of 40% of total dwellings as affordable housing. Or the percentage of affordable housing as set out in:
 - i. a site-specific allocation; or in the absence of a site-specific allocation where the site is located within Camberley Town Centre and is for fully flatted development the affordable housing requirement will be reduced to 25%; or
 - ii. Policy H6 “Specialist Housing”; or
 - iii. Policy H5 “Range and Mix of Housing” for Build to Rent homes;
 - b) 25% of affordable housing to be provided as First Homes;
 - c) Having accounted for First Homes, the mix of tenures for the remaining affordable housing must, to the Council’s satisfaction, reflect local needs identified in the [Local Housing Need Assessment](#) (2024) or any subsequent update, and must be affordable having regard to local incomes and house rents and/or prices;
 - d) In cases where the percentage calculation provides a part dwelling, a financial contribution will be sought equivalent to that part of the residential dwelling;
 - e) The mix of dwelling sizes must reflect the Council’s [Local Housing Need Assessment](#) (2024) or any subsequent update, and have regard to the size,



characteristics and location of the site;

- f) On-site affordable housing must be well integrated within the proposed development and should be indistinguishable in appearance from market housing on site.
- 2) Where land has been subdivided into smaller development parcels that cumulatively meet the thresholds in criterion 1 of this policy, the Council will assess the site as a whole and will require the policy compliant percentage of dwellings to be provided as affordable housing on each parcel.
- 3) Viability will only be considered a constraint to the delivery of a policy compliant level of affordable housing in exceptional circumstances and where there are significant additional site development costs. In order to demonstrate viability constraints to the Council's satisfaction proposals must be supported by an independent viability assessment on terms agreed by the Council and funded by the developer/applicant. If less than a policy compliant level of affordable housing is justified to the Council's satisfaction, the Council will include a viability review mechanism in a S106 agreement.
- 4) Affordable housing must be provided on site unless exceptional circumstances are demonstrated to the Council's satisfaction and delivery of affordable housing secured either off site or through a commuted sum of equivalent value.



- 3.86. “Affordable housing” is defined in Annex 2 of the NPPF as: “housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)...”. The definition includes references to affordable housing tenures such as social rent, affordable rent and shared ownership.
- 3.87. A minimum of 25% of all affordable housing delivered on a site must be First Homes, as required by national policy. First Homes are a specific kind of discounted market sale housing available for first time buyers which must be discounted by a minimum of 30% against the market value. The discount is to be retained in perpetuity through a restriction registered on the title at HM Land Registry and the first sale of the property must be at a price no higher than £250,000 once the discount has been applied as set out in [HM Government, Guidance on Built to Rent \(2018\)](#).
- 3.88. In order to purchase a First Home, buyers must meet the following eligibility criteria in addition to any local connection criteria adopted by the Council:
1. All purchasers must be first time buyers as defined in paragraph 6 of Schedule 6ZA of the Finance Act 2003 for the purpose of Stamp Duty Relief.
 2. Purchasers must have a combined annual household income of no more than £80,000.
 3. Purchasers should have a mortgage or home purchase plan to fund a minimum of 50% of the discounted price.
- 3.89. The Council’s [Local Housing Needs Assessment 2024](#) reviewed affordable housing needs in Surrey Heath. The study indicated that there is a need for 184 affordable housing per year in the Borough. The greatest affordable housing need is for social and affordable rented housing and this will be prioritised in the tenure mix. In particular, provision of social rent will be further prioritised where delivery does not prejudice the overall delivery of affordable housing, as this is the most affordable tenure for households on lower incomes. Affordable home ownership housing, including shared ownership and low cost home ownership, will form a smaller part of the tenure mix reflecting the requirement to provide First Homes and the fact that this tenure meets a lower proportion of needs. The preferred tenure mix, as broadly tested in the [Whole Plan Economic Viability Assessment 2024](#), is set out in Table 6 below.



Table 6: Affordable Housing tenure mix

Affordable Housing Tenure	Percentage of Affordable Housing
Social Rent	40%
Affordable Rent	15%
Affordable Home Ownership (including shared ownership)	20%
First Homes	25%

- 3.90. Proposals must have regard to the most recent evidence for tenure split, where the housing need evidence base is subsequently updated.
- 3.91. Affordable housing for rent can be provided at different levels of rent so long as they are no higher than 80% of the local market rates. Currently, rented affordable housing is split into two sub-categories: social rented and affordable rented housing. The Council will determine the tenure mix and dwelling type based on local needs and incomes but will prioritise the delivery of social rent where possible, as evidenced by needs identified in the Local Housing Needs Assessment. Affordable housing for rent should remain at an affordable price for future eligible households, or the subsidy should be recycled for alternative affordable housing provision. Affordable housing or financial contributions will be secured through Section 106 agreements.
- 3.92. Affordable housing must be integrated within proposed developments to help build and maintain balanced and mixed communities in Surrey Heath. However, the feasibility of managing and maintaining the affordable housing will also be given consideration when assessing the acceptability of their siting and distribution.
- 3.93. The Council will not accept the subdivision of sites into smaller development parcels that it considers are being partitioned in order to circumvent the affordable housing requirements of this policy, or any other policy requirements within this Plan. In determining whether two or more pieces of land in close proximity to each other should be considered as one site, the Council will have regard to relevant information about the land, including:
1. Present and historic land ownership;
 2. The planning history of the land; and,
 3. Whether there is a reasonable prospect of developing both the sites together.



- 3.94. It is strongly recommended that applicants and developers use the Council's Pre-application Service as an opportunity to work with the Council to understand the affordable housing needs in Surrey Heath in greater detail. This will be informed by the National Policy requirement for First Homes, the latest [Local Housing Need Assessment](#), data from the local authority's Housing Register and information provided to the Council from registered social housing providers operating in the area. The additional evidence obtained through this exercise should be used to help inform the mix of affordable housing types, sizes and tenures in the proposal, reflecting up-to-date needs in the Borough.
- 3.95. Proposals that are above the thresholds for affordable housing provision are required to submit an Affordable Housing Statement, as set out in the Council's [Local Validation List](#). In addition to the requirements outlined in the Local Validation List, the Affordable Housing Statement should also demonstrate:
1. How pre-application discussions have informed the mix of affordable housing types, sizes and tenures in the proposal; and,
 2. How the tenures of the proposed affordable housing will comply with the National Policy requirement for First Homes and meet local housing need in Surrey Heath, with reference to local incomes and house rents/prices.
- 3.96. The 40% affordable housing requirement included in the policy is supported by the published evidence base, including the [Local Plan Economic Viability Assessment](#) 2024. This assessed delivery of affordable housing based on the tenure mix set out in Table 6 above. The Assessment identifies viability challenges for the delivery of affordable housing in Camberley Town Centre for fully flatted development, where 25% affordable housing is viable and significant viability challenges for delivery of affordable housing as part of specialist housing developments (see Policy H6 "Specialist Housing").
- 3.97. Where a developer considers that delivery of policy compliant affordable housing or the tenure split set out in Table 6 is unviable, robust evidence demonstrating why it is unviable must be provided in the form of an independent viability assessment. This should include an explanation and justification as to how costs and assumptions differ from those in the [Local Plan Economic Viability Assessment](#) 2024 and should be consistent with national Planning Practice Guidance. The assessment should include modelling for different options for affordable housing provision, taking into account dwelling types and tenures, rather than an assumption that no affordable housing provision is viable.



- 3.98. The viability assessment should be prepared on the basis that it will be published on the Council's website, to ensure transparency. In exceptional circumstances where commercial sensitivity can be demonstrated, then as a minimum an Executive Summary will be published. Where developers raise viability issues the Council will commission an independent review of the applicant's viability assessment for which the applicant will bear the cost. Subject to the Council's agreement to the outcomes of the viability assessment, the Council will then engage in negotiations with the applicant to agree the optimum viable mix of affordable housing provision and mix, whilst also having regard to other infrastructure requirements.
- 3.99. In exceptional circumstances where it can be satisfactorily and robustly demonstrated that the level of affordable housing being sought would be unviable, alternative tenure mixes and levels of affordable housing provision may be considered. In the first instance this should seek to provide 25% First Homes and retain the same number of homes in the affordable housing for rent category, with priority given to social rent, and to vary the type or reduce the number of shared ownership homes. This is because current evidence indicates that the greatest local need is for affordable housing for rent. The Council will include a viability review mechanism in planning obligations to ensure that viability on site can be reviewed over time. The detail of this mechanism will be set out in the planning obligation (S106 agreement) and will include a requirement to review provision of more affordable homes on the site.
- 3.100. Affordable housing must be provided on-site unless exceptional circumstances are demonstrated. Exceptional circumstances will be considered on a site-by-site basis. Provision of affordable housing on an alternative site or through a financial contribution in lieu, should be of broadly equivalent value to the on-site provision.

Policy H8: Loss of Housing

- 3.101. The supply of land available for new residential development is extremely limited within Surrey Heath. The existing housing stock is therefore highly valued. Given the scale of housing need within Surrey Heath, it will be important to ensure that the existing supply of homes are protected; otherwise the benefits of building new housing would be undermined.
- 3.102. To protect the existing housing stock, Policy H8 seeks to minimise the net loss of dwellings, whilst allowing some flexibility to enable the loss of dwellings where it has been demonstrated that there are exceptional circumstances where the harm arising from the loss of a dwelling may be outweighed by other factors.

Policy H8: Loss of Housing

- 1) Proposals for the redevelopment, conversion or change of use of land or buildings



involving the net loss of residential units will not be permitted unless one of the following circumstances apply:

- a) The proposal would enable units of sub-standard size to be enlarged or replaced with alternative residential provision within the same use class, in order to meet residential space standards; or,
 - b) The proposal would enable existing affordable homes to be adapted to address an identified shortfall in larger affordable dwelling sizes; or,
 - c) The proposal would ensure that a building of historic importance can be retained or renovated; or,
 - d) The proposal would provide a non-commercial social, community or cultural service or facility where both of the following criteria apply:
 - e) The applicant can demonstrate a local need; and,
 - f) It has been demonstrated that the service or facility cannot be provided elsewhere.
- 2) Development proposals that would result in the loss of part of an existing unit of residential accommodation will only be permitted where any retained residential accommodation would be of a satisfactory standard in terms of amenity and internal space.
 - 3) 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.

3.103. The National Planning Policy Framework requires local planning authorities to boost significantly the supply of housing. By implication, the loss of an existing housing stock would be at odds with this objective of the National Planning Policy Framework.

3.104. Within Surrey Heath, a number of significant policy and environmental designations limit the amount of land available for residential development, including the Thames Basin Heaths Special Protection Area which covers 23% of the Borough and prohibits residential development within a 400m buffer zone around its perimeter. As a result of this, and other policy designations, including the Metropolitan Green Belt, the housing targets for the Borough are challenging to achieve. Any loss of existing units would exacerbate these difficulties and will inhibit the Borough's ability to significantly boost the supply of housing. As a result, it is important to ensure that the existing stock of homes is protected.



- 3.105. Notwithstanding this, there may be some cases where the harm arising from the loss of a dwelling may be outweighed by other factors, as set out in this Policy. In cases where a net loss of residential development is proposed, the applicant will be required to provide robust and appropriate evidence to justify the exception; depending on the circumstances of the case, this may be provided within an Affordable Housing Statement, Planning Statement or Heritage Statement as appropriate.
- 3.106. Certain types of housing can contribute toward meeting the needs of the Borough's older population and people with disabilities, such as single storey homes. The Council recognises the role of such single storey accommodation in contributing to meeting the accommodation needs of older persons and welcomes its retention where this would help address local housing needs indicated in the Local Housing Need Assessment, and is consistent with other local plan policies.

Policy H9: Rural Exception Sites

- 3.107. In rural areas of the Borough, high house prices and a limited supply of new affordable homes restrict the potential for residents and those working in the area to live in a home that they can afford. People who cannot afford to access market housing that meets their needs, either to rent or to buy, need affordable homes. The development of rural exception sites can help to meet a range of local affordable housing needs in rural areas, by allowing for genuinely affordable housing schemes that meet evidenced local needs, on suitable sites outside the defined settlement boundaries. Rural exception sites are an exception to normal planning policy and do not set a precedent for other development beyond village boundaries.

Policy H9: Rural Exception Sites

- 1) Small scale developments of affordable housing or affordable pitches for Gypsies and Travellers which are outside defined rural settlement boundaries will only be permitted where they meet all of the following criteria:
- a) the number, size and tenure of homes has been demonstrated to meet, or contribute to meeting, the evidenced affordable housing needs of the local area;
 - b) it has been demonstrated that the need cannot be met within a settlement boundary;
 - c) the site adjoins a rural settlement; and can be demonstrated to be in a sustainable location;
 - d) the affordable homes are secured in perpetuity;
 - e) that the housing or pitches will be for those with a local connection in the first instance and this will be ensured through legal agreement; and
 - f) the development is in keeping with the character and size of the settlement.



- 2) The minimum number of market dwellings within a rural exception site will only be permitted in exceptional circumstances where the following is evidenced:
 - a) the scheme would be demonstrated to be unviable without the inclusion of market housing;
 - b) it would not inflate the threshold land value (the minimum land value likely to trigger an owner to sell the land); and
 - c) the development physically integrates open market and affordable housing.

3.108. There are fewer opportunities to provide housing developments at a scale which will deliver significant levels of affordable units within the Borough's smaller rural settlements. Some of these areas are partly and fully surrounded by, or designated as Green Belt, where new residential development is often restricted, and countryside beyond the Green Belt. As such, this Policy seeks to enable the provision of genuinely affordable-led developments in locations adjacent to rural settlements within the Borough, incorporating:

- Bagshot;
- Bisley;
- Chobham;
- Deepcut;
- Lightwater;
- Mytchett;
- West End; and
- Windlesham.

3.109. Affordable housing in rural settlements can help to provide accommodation for local people, who often have a local connection through employment, or from growing up in the area and still having family who reside in the locality.

3.110. A rural exception site is an exception to normal planning policy, therefore, the applicant must justify their proposals to the Council and community, by being fully compliant with this Policy.

3.111. The appropriate size of a rural exception site will be considered on a case-by-case basis, taking into account the scale of the proposed development in relation to the settlement and site specific considerations, including the sustainability of the location, and the level of evidenced local need.



- 3.112. In assessing proposals for rural exception sites for housing, the applicant must robustly demonstrate that there is a genuine local need for affordable housing of the number, size and tenure of homes proposed from people who are or have been closely connected with the rural settlement through family, recent past residence, or current employment. Needs should be established through a robust, and up to date, Local Housing Needs Assessment. Only surveys carried out using a methodology agreed by both the relevant Parish Council and the Borough Council will be considered suitable.
- 3.113. In assessing proposals for rural exception sites for Gypsy and Traveller sites, needs will be established through the most up to date Gypsy and Traveller Accommodation Assessment (GTAA). Rural exception sites for Gypsies and Travellers should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection to the Borough.
- 3.114. The applicant must demonstrate that there are no sequentially preferable sites within the associated settlement area that have been, or would be, capable of meeting local affordable housing needs. At a minimum, this should examine past delivery of affordable housing and available sites as identified within the SLAA.
- 3.115. The Council will not support unsustainable patterns of development. Rural exception sites that are disconnected from settlements are likely to lead to an increased dependence on private motor vehicles and the creation of isolated communities that would not benefit from the services needed on a day to day basis. In this respect, the Council considers that rural exception sites should be adjacent to an existing settlement.
- 3.116. In order for a rural exception scheme to be granted planning approval the housing provider will have to demonstrate that mechanisms are in place to ensure that the properties remain as affordable housing in perpetuity. For example, being held in a Community Land Trust and let on terms, which would not allow the freehold to be acquired by the resident, and/or sold on the open market. To ensure that affordable housing provided through rural exception sites remains affordable for those with a local connection to the parish in perpetuity, the development and occupancy of each rural exception site will be controlled through a legal agreement.
- 3.117. It is essential that rural exception sites are clearly and demonstrably affordable housing led. The [Local Plan Viability Assessment](#) 2024 found that when tested against Local Plan policies as a general rule, 10 to 15% of market housing would be required to make rural exception sites viable. This is in line with the National Planning Policy Framework, which recognises that market housing may be required to make a proposal viable. In such instances the site must be delivered with an appropriate mix and integration of affordable and open market tenures.



- 3.118. In cases where viability concerns are raised, it will be necessary for negotiations between the Council and the applicant to take place to understand what has impacted the development's reduced viability or non-viability. Where market housing is proposed, the Council will require submission of an open book development viability appraisal. The evidence will be published on the Council's website, to ensure transparency. External consultants will be appointed at the applicants' cost to provide an independent assessment of the scheme's viability. As part of this process, the applicant will be required to apply the government's [Development Appraisal Tool](#) or other equivalent tools agreed with the Council in advance of the assessment.
- 3.119. If the exceptional circumstances for the inclusion of market housing on a site can be satisfactorily and robustly demonstrated, and the level of affordable housing being sought would be unviable, alternative tenure mixes and levels of affordable housing provision may be considered. In the first instance, this should seek to retain the same number of homes in the Subsidised Rented Affordable Housing category, and vary the type or reduce the number of homes in the Affordable Intermediate housing category.

Policy H10: First Homes Exception Sites

- 3.120. As set out in relation to the Rural Exception Site Policy (H9), in rural areas of the Borough, high house prices and a limited supply of new affordable homes restrict the potential for residents and those working in the area to live in a home that they can afford. National Planning guidance sets out that First Homes can be delivered on 'First Homes exception sites' outside the defined settlement boundaries.

Policy H10 – First Homes Exception Sites

- 1) Proposals for First Homes which are outside defined settlement boundaries and lie within the Countryside beyond the Green Belt will be permitted where they meet all of the following criteria:
 - a) the site adjoins a defined settlement boundary and can be demonstrated to be in a sustainable location;
 - b) the First Homes are secured in perpetuity;
 - c) the need for First Homes is not being met within the Borough;
 - d) the development is small scale and proportionate to the character and size of the settlement; and
 - e) the development will not lead to visual or physical coalescence of settlements.
- 2) Market dwellings within a First Homes exception site will only be permitted in exceptional circumstances where the following is evidenced:



- a) the requirements set out in 1a - e are satisfactorily met;
 - b) the scheme would be unviable without the inclusion of market housing;
 - c) it would not inflate the threshold land value (the minimum land value likely to trigger an owner to sell the land);
 - d) the amount of market housing is only that required for viability purposes; and
 - e) the development physically integrates open market and affordable housing.
- 3) The provision of other forms of affordable housing as part of the affordable housing mix will be permitted where local evidence demonstrates a significant local need.

- 3.121. First Homes provide a discounted market form of affordable housing as set out in more detail in relation to Policy H7. National Planning Practice Guidance sets out that First Homes may be acceptable on 'exception' sites. These are sites not allocated within the Local Plan, that are adjacent to a settlement and which are of a small scale proportionate to the size of the settlement. First Homes exception sites cannot come forward in areas designated as Green Belt or designated rural areas as defined in Annex 2 of the NPPF. In these areas Rural Exception Sites are the sole permissible type of exception site wherein development proposals must accord with Policy H9 on Rural Exception Sites.
- 3.122. First Homes Exception sites are therefore limited to sites adjacent to the settlement boundary in the Countryside beyond the Green Belt. In Surrey Heath such sites will be limited due to the presence of the Thames Basin Heaths SPA and the 400m buffer and other constraints.
- 3.123. As set out in relation to Policy H7: Affordable Housing, First Homes will be secured in perpetuity through a legal agreement and land registry title on the property. They will be available to those that meet the First Homes eligibility requirements and meet any First Homes local connection criteria adopted by the Council.
- 3.124. The Council will not support unsustainable patterns of development. Exception sites that are disconnected from settlements are likely to lead to an increased dependence on private motor vehicles and the creation of isolated communities that would not benefit from the services needed on a day to day basis. The Council therefore expects Exception sites to be physically adjacent to an existing settlement.



- 3.125. Where development proposals come forward for First Homes Exception sites applicants will be expected to demonstrate that the site is of a proportionate scale. The Council will take matters including the scale of the existing settlement and the impact on coalescence and separate identity of settlements into account in any such assessment. It is considered that the previous national guidance on a proportionate size for Entry Level Exception sites is appropriate as a guide. This set out that Exception sites should not be more than 1 hectare in size or exceed a maximum of 5% of the size of the existing settlement. Applicants should set out how their proposal is of a proportionate scale having regard to these issues.
- 3.126. In line with national Planning Practice Guidance, the Council recognises that in exceptional circumstances market housing may be required to make a proposal viable. In such instances the site must be delivered with an appropriate mix and integration of affordable and open market tenures.
- 3.127. In cases where viability concerns are raised, it will be necessary for negotiations between the Council and the applicant to take place to understand what has impacted the development's reduced viability or non-viability. Where market housing is proposed, the Council will require submission of an open book development viability appraisal to ensure that only the amount of market housing required to enable the development to come forward is provided. The evidence will be published on the Council's website, to ensure transparency. External consultants will be appointed at the applicants' cost to provide an independent assessment of the scheme's viability. As part of this process, the applicant will be required to apply the government's [Development Appraisal Tool](#) or other equivalent tools agreed with the Council in advance of the assessment.
- 3.128. The Council would support other forms of affordable housing being provided alongside First Homes. However, in line with Government guidance such proposals would need to be robustly supported by evidence of local need. This evidence should be consistent with that provided for Rural Exception sites as set out under Policy H9. Government guidance also makes clear that First Homes Exception sites will also only be permissible where the need for such homes is not being met within the Borough. Whilst it is considered unlikely that this would be the case, should the Housing Needs Assessment and ongoing monitoring demonstrate to the Council that the housing need for first time buyers is being met then First Homes Exception sites will not be justified.



Policy H1 I: Gypsies and Travellers and Travelling Showpeople

- 3.129. The Council has a responsibility through the NPPF, and legal requirements, to assess and plan for the housing needs of all residents, including Gypsy and Traveller and Travelling Showpeople communities. The national Planning Policy for Traveller Sites (PPTS) (2015, updated 2023) directs the process that must be followed in order to effectively assess and plan for this specific housing requirement.
- 3.130. The Government's overall aim, as set out in the PPTS, is "to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community".
- 3.131. The PPTS defines those who qualify as 'Gypsies and Travellers' as follows: "Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such". The PPTS also sets out that Travelling Showpeople are defined as "Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, education or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.
- 3.132. The Council should also seek to accommodate others who reside in caravans and Gypsies and Travellers and Travelling Showpeople who do not meet the planning definition, however, national policy states that this need should be met as part of general housing need.
- 3.133. The Council has an identified a need for at least 35 pitches for Gypsies and Travellers and 14 plots for Travelling Showpeople meeting the planning definition across the plan period (see Table 7). The Council also has an identified need for a further pitch for Gypsies and Travellers whose travelling history is unknown and 29 pitches for Gypsy and Traveller households that did not meet the planning definition (please refer to the Surrey Heath [Gypsy and Traveller Accommodation Assessment 2020](#), to be read in conjunction with the [supporting letter from ORS \(March 2024\)](#)).



Table 7: Identified needs for Gypsies and Travellers

Category	1-5 2020-25	6-10 2025-30	11-15 2030-35	16-20 2035-40	Total
Pitches required for Gypsies and Travellers meeting the planning definition	25	3	3	4	35
Pitches required for Gypsies and Travellers whose travelling history is unknown	0	0	1	0	1
Pitches required for Gypsies and Travellers not meeting the planning definition	14	5	5	5	29

- 3.134. The Council also has an identified need for at least 14 plots for travelling showpeople meeting the planning definition across the plan period (see Table 8). All Travelling Showpeople were identified as meeting the planning definition.

Category	1-5 2020-25	6-10 2025-30	11-15 2030-35	16-20 2035-40	Total
Pitches required for Gypsies and Travellers meeting the planning definition	8	2	2	2	14

Table 8: Identified needs for Travelling Showpeople

- 3.135. Environmental constraints and land availability issues has made the identification of sites for allocation within the Local Plan very challenging; as such only one site has been brought forward as an allocation within the Plan. This site comprises a 5-pitch extension to an existing Gypsy and Traveller site at Swift Lane, and is allocated within Policy H12.
- 3.136. The Council acknowledges it is currently unable to meet the accommodation needs of the borough's Gypsy and Traveller and Travelling Showpeople communities through an appropriate number of site allocations and as such it encourages unallocated Gypsy and Traveller and Travelling Showpeople sites to come forward to help address this need. The Council will therefore support planning applications that help to meet the accommodation needs of the Gypsy and Traveller and Travelling Showpeople communities as set out within the Gypsy and Traveller Accommodation Assessment.



- 3.137. Policy H11 sits alongside the site allocation within Policy H12 and supports the delivery of additional Gypsy and Traveller pitches and Travelling Showpeople plots on non-allocated sites by setting out clear criteria against which planning applications can be assessed and by placing a requirement on larger sites of over 100 gross dwellings to provide Gypsy and Traveller and Travelling Showpeople provision to help meet the Borough's identified needs for these groups.

Policy H11: Gypsies, Travellers and Travelling Showpeople

Safeguarding Existing Supply

- 1) Existing sites permitted for Gypsy and Travellers or Travelling Showpeople will be safeguarded in perpetuity. Proposals which fail to protect existing Gypsy and Traveller or Travelling Showpeople sites, or involve a loss of pitches or plots will not be permitted unless it can be evidenced that they are no longer required.

Planning Applications

- 2) Planning permission for the expansion of existing sites or for new sites to accommodate Gypsy and Traveller and Travelling showpeople accommodation, will be permitted outside of allocated sites where the following criteria are met:

Location

- a) The site is well-related to an existing defined settlement in terms of size and location. The site should not dominate the nearest settled community when considered alone or in combination with other nearby traveller sites.
- b) The site is, or will be made accessible to local services and facilities.
- c) Demand placed on local infrastructure arising from the site can be accommodated within existing or planned provision.
- d) The site is compatible with surrounding land uses and will provide an acceptable living environment for future occupiers.

Physical characteristics

- e) The site will have suitable pedestrian and vehicular access to the highways network and provides adequate space for vehicle parking, turning and servicing of large vehicles, taking into account the types of vehicles that could reasonably be expected to use or access the site;
- f) The site is capable of being provided with essential utilities, including mains water, electricity, sewerage, drainage and waste disposal.
- g) The site is not subject to physical constraints or other environmental issues that cannot be mitigated or remediated to an acceptable level, or that would



Policy H11: Gypsies, Travellers and Travelling Showpeople

impact upon the health, safety or general wellbeing of residents of the site;

Character and amenity

- h) The site is or will be well integrated into the surrounding area in a manner in keeping with the local character and uses boundary treatments and screening materials which are sympathetic to the existing urban/rural form;
- i) The site is able to accommodate residential use and where relevant the range of economic activities and vehicles associated with residents' mobile lifestyles without unacceptable impact on amenities enjoyed by neighbouring occupants.

Green Belt

- 3) Sites within the Green Belt will need to demonstrate very special circumstances which clearly outweigh the harm to the Green Belt.

Travelling Showpeople Yards

- 4) The following criterion applies additionally to Travelling Showpeople Accommodation:
 - a) The site should be suitable for the storage, maintenance and testing of show equipment and associated vehicles, where required, without creating unacceptable nuisance, or presenting a risk to the health and safety of those living on or near the site. Where appropriate, conditions and/or Section 106 obligations may be used to limit the hours within which equipment can be tested.
- 5) Any planning permission granted for a Gypsy and Traveller site or Travelling Showpeople yard will be subject to a condition limiting occupation to Gypsies and Travellers or Travelling Showpeople, as appropriate.

Meeting future needs within larger development sites

- 6) To meet the needs of Gypsy and Traveller and Travelling Showpeople households whether they meet the planning definition or not, accommodation is expected to be provided on development sites of 100 homes or more whilst there remains an identified need within Surrey Heath. Allocated sites within Camberley Town Centre which deliver regeneration will not be expected to provide provision.
- 7) The number of pitches and plots required will reflect the level of local need within Surrey Heath. However, sites will have at least 3 pitches/plots, and should contain the maximum number of pitches/plots that can be reasonably accommodated on the site.



Policy H11: Gypsies, Travellers and Travelling Showpeople

- 8) If a development site is required to make on-site provision for traveller accommodation and has robustly demonstrated that it is unable to do so, offsite provision will be considered.
- 9) Offsite accommodation will only be considered appropriate where all of the following criteria are met:
 - a) The exceptional circumstances demonstrating on-site provision is not feasible have been proven;
 - b) The alternative site provides for at least the same quantity of provision;
 - c) The alternative site is considered as sustainable in regards to access to services, location and size as allocation on site;
 - d) The site can be developed within the timeframe of the housing development.

- 3.138. Policy H11 supports the delivery of additional Gypsy and Traveller pitches and Travelling Showpeople plots in order to meet the Councils identified needs, by setting out clear criteria against which planning applications for Gypsy and Traveller and Travelling Showpeople accommodation can be assessed and by placing a requirement on strategic developments to provide Gypsy and Traveller and Travelling Showpeople provision to help meet the Borough's identified needs for these groups.
- 3.139. The criterion set out at Part I of this policy seeks to ensure that windfall applications for Gypsy and Traveller and Travelling Showpeople sites are suitably located. Locational considerations will include an assessment of whether the site would, either alone or in combination, dominate the nearest settled community. In making this assessment, the nearest settled community will be taken as the nearest settlement as defined on the Policies Map of the Local Plan, unless it can be clearly demonstrated that assessment should be made at an alternative scale.
- 3.140. Sites are expected to be accessible to local services and facilities, or capable of being made so. As such, the proximity of sites to existing settlements is considered important, although this does not rule out sites that are located away from a settlement boundary providing they are reasonably close to key local services and facilities, or are capable of benefitting from sustainable forms of transport.



- 3.141. In considering whether a site will alone, or in combination place undue pressure on local infrastructure, regard will be had to the Surrey Heath Infrastructure Delivery Plan 2022, (or as updated). In line with Policy IN1, where existing infrastructure is considered inappropriate to accommodate new development, consideration will be given as to whether contributions towards the enhancement of off-site facilities could address any issues identified, where viable.
- 3.142. Sites or yards should benefit from suitable pedestrian and vehicular access to the highways network and should provide adequate space within the site for the parking, turning and servicing of large vehicles. Each site should be assessed on its own merits, taking into account the types of vehicles that may be expected to access the site. For example, the access and servicing requirements for a purely residential Gypsy and Traveller site will be different to those required to support a mixed use Gypsy and Traveller site or a Travelling Showpeople Yard.
- 3.143. Where sites are subject to physical constraints or other environmental issues that may impact upon the health, safety or general wellbeing of residents of the site, evidence should be submitted to support the relevant planning application which sets out the severity of the identified issues, together with proposals for mitigation or remediation, should this be required.
- 3.144. In considering impact upon the character of the area in which developments are sited, regard should be had to guidance published by the Council as relevant, including key characteristics of Conservation Areas and Landscape Character Areas. Development should not adversely impact upon the key characteristics of Landscape Character Areas.
- 3.145. In considering the compatibility of development with surrounding land uses, regard will be had to the potential impacts of the development upon the amenities enjoyed by neighbouring occupants. This will include consideration of any impacts arising from mixed-use development, where joint commercial and residential development is proposed. Consideration will also be given as to how surrounding land uses may impact upon the amenities of future occupants of the proposed development.
- 3.146. All proposed Gypsy and Traveller sites and Travelling Showpeople yards will be required to comply with the requirements of this Policy, in addition to other Policies within the Local Plan as relevant, including (but not limited to) Policies DMI: Design Principles, Policy EI: Thames Basin Heaths Special Protection Area and Policy E6: Flood Risk and Sustainable Drainage.



- 3.147. National planning policy establishes a general presumption against inappropriate development in the Green Belt. The definition of inappropriate development includes Gypsy and Traveller and Travelling Showpeople sites. The PPTS sets out that subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances. In considering whether there are very special circumstances which clearly outweigh harm to the Green Belt, regard will be had to material considerations, including the scale of the unmet need, the nature of the harm to the Green Belt, whether the applicant or likely future occupants meet the PPTS definition of a Gypsy and Traveller and any other personal circumstances as relevant.
- 3.148. In granting consent for a site, the Council will include a condition to ensure that the sites remain in use by Gypsies and Travellers or Travelling Showpeople as appropriate, and the number of pitches and plots are retained to ensure a supply to meet demand.
- 3.149. To aid the delivery of the pitches and plots required across the plan period, the provision of on-site pitches/plots will be required as part of the development of residential sites of 100 homes or more while there remains a need in Surrey Heath unless the site is an allocated site located in Camberley Town Centre where regeneration priorities and viability impact on the deliverability of pitch and plot provision. The Council will work with developers from pre-application stage to secure the delivery of pitches or plots on applicable sites, including securing appropriate management arrangements, working with Surrey County Council. Off-site provision will only be acceptable where it has been robustly demonstrated that on-site provision is not possible.
- 3.150. It is important to protect existing Gypsy and Traveller sites from being developed for alternative uses whilst there is a need for such sites, as currently demonstrated by the GTAA. These sites are safeguarded for future generations of Gypsies and Travellers and the loss of pitches or plots will be strongly resisted.
- 3.151. Any new traveller sites granted planning permission and implemented shall also be safeguarded under the provisions of this policy as long as the need for traveller accommodation within the Borough remains.
- 3.152. The Council will normally apply planning conditions limiting the occupation of Gypsy and Traveller sites to those who meet the definition of Gypsy and Travellers as defined in the PPTS.



Policy HI2: Site Allocations for Gypsy and Travelling Showpeople Accommodation

Policy HI2: Site Allocations for Gypsy and Travelling Showpeople Accommodation

HA12/01 – Swift Lane Extension, Swift Lane, Bagshot, GU19 5NN

- 1) Swift Lane Extension is allocated for 5 net Gypsy and Traveller Pitches.
- 2) Development proposals are required to:
 - a) Provide high quality landscaping and appropriate and usable private and communal amenity space.
 - b) Incorporate additional pitches as part of a wider redevelopment of the existing site to provide an improved layout conducive to community and individual well being through good design.
 - c) Provide clear and defensible site boundaries sensitive to the countryside setting.
 - d) Provide compensatory improvements to the surrounding Green Belt, which could include the delivery of improvements to existing green infrastructure, wider biodiversity improvements, and new and enhanced walking and cycling routes.

- 3.153. The Surrey Heath GTAA 2020 indicates that a significant proportion of the Council's identified needs for Gypsies and Travellers arises from overcrowding on existing sites and from teenage children in need of a pitch of their own in the next five years.
- 3.154. Swift Lane Gypsy and Traveller site is an existing, well-established Gypsy and Traveller site comprising 14 pitches, which is owned by Surrey Heath Borough Council and managed by Surrey County Council. The Council has identified that there is scope to provide a further 5 pitches on land within the ownership of Surrey Heath Borough Council to the east of the existing site. These pitches would assist in meeting a proportion of needs arising from the existing site.
- 3.155. PPTS indicates that if a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt to meet a specific, identified need for a traveller site, it should do so only through the plan making process. It is considered that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the extension to Swift Lane Gypsy and Traveller site.



- 3.156. As a result of former landfill and historic unauthorised works, some areas of land around Swift Lane (particularly to the east of Swift Lane) are known to have contamination issues which will need to be remediated. In addition, it is noted that the Council also recognises that the site is located in flood zone 2 and accordingly a flood risk assessment will therefore be required to support any planning application submitted for the site. Swift Lane Gypsy and Traveller site and the adjoining recycling centre is served by a single lane access track with passing places, which can become congested at peak times. Opportunities to improve the access arrangements serving the recycling centre and Gypsy and Traveller site should be explored with Surrey County Council at pre-application stage.



Section 4: Town Centres, Retail and Economy

- 4.1. This section of the Local Plan considers economic growth, retail provision and the future development of town centres in Surrey Heath including Policies relating to Camberley Town Centre.

Policy CTCI: Camberley Town Centre

- 4.2. Camberley Town Centre lies in the west of the Borough along the A30 London Road and just east of the Borough's western boundary with Berkshire and Hampshire. As set out in the Spatial Strategy section Camberley is the main retail centre in the Borough providing for a mix of shopping, business, leisure, civic, cultural and community activities. The amount of residential accommodation in the town centre has increased over the last few years. The boundary of the town centre is shown on the Policies Map.
- 4.3. The town centre includes Camberley Railway station as well as civic, community and leisure facilities on Knoll Road including Camberley Theatre. The core retail area is focused around The Square, the High Street and Park Street with the Atrium hosting a nine screen cinema and a range of leisure and restaurant facilities.
- 4.4. The Council has a corporate objective to deliver an improved town centre and has made significant investment in the town centre over recent years. In partnership with others, particularly Surrey County Council and the Enterprise M3 LEP this includes:
1. the acquisition and subsequent refurbishment of The Square shopping centre;
 2. the acquisition of Ashwood House, the former BHS and office building, and redevelopment into 116 high quality residential apartments;
 3. improvement works to High Street, Princess Way and Knoll Walk to create a more pedestrian-friendly high quality street environment; and
 4. Improvement works along the A30.
- 4.5. Camberley Town Centre contains two key redevelopment sites at the London Road Block (Policy HA2) and Land East of Knoll Road (Policy HA3). Both are predominantly owned by the Borough Council and will provide for a significant increase in new homes in the town centre as well as bringing other regeneration benefits.
- 4.6. The Council has prepared a Strategic Vision for Camberley Town Centre looking to 2032 (January 2023) and along with the Local Plan, this will inform future masterplanning.
- 4.7. Over recent years, there have been some significant social and economic changes that affect future town centre policies. These include:



1. A decline in the demand for retail space and in retail investment and the rise of online shopping;
2. Increased importance of town centres for leisure and health facilities;
3. Changes in planning legislation and guidance giving greater flexibility between land uses;
4. Covid-19 and the short and longer term economic effects and changes to the way people work, travel and shop;
5. Changes in digital technology;
6. Climate change significance, commitments and technology;
7. Recognition of the increased scope and value of residential development in town centres.

- 4.8. Partly in response to the impacts of Covid-19, the Government introduced a number of significant planning reforms that impact on town centres, including changes to the Use Classes Order. This, and other changes to permitted development rights, mean that there is much greater flexibility for changes of use in town centres without the need for planning permission.
- 4.9. The Vision for Camberley Town Centre is set out in Section I of this Plan and for ease of reference repeated below.

Camberley Town Centre will be renowned for its unique and independent feel. A modern, vibrant, accessible and connected place. Offering excellent service through independent shopping, dining and top-class leisure facilities, and the location of choice in the region to meet up socially with family and friends.

Entrepreneurial spirit and a growing and active residential community will be supported by high-quality green space and public realm, a strong cultural and public service offer, great digital connectivity, an unrivalled quality of life underpinned by a strong sense of community.



Policy CTCI: Camberley Town Centre

- l) Within the defined town centre boundary, development will be permitted that maintains or enhances the vitality and viability of Camberley town centre and which, as appropriate to the scale and type of development:
- a) contributes to the delivery of a healthy and vibrant, experience based town centre by ensuring it is the focus for the development of main town centre uses and provides for all sectors of the community;
 - b) protects a robust retail core in the Primary Shopping Area by supporting a concentration of retail uses in line with Policy CTC2;
 - c) is consistent with the delivery of the priority regeneration sites including London Road Block as set out in Policies HA1: Housing Allocations; HA2; London Road Block and HA3: Land East of Knoll Road;
 - d) retains and enhances existing markets and supports opportunities for the creation of new markets;
 - e) delivers a safe, healthy and accessible environment, supporting the 20 Minute Neighbourhood principles;
 - f) delivers a mix of high quality homes, including affordable homes meeting local needs, on suitable sites within the town centre, including above ground floor level and as set out in Policies HA1, HA2, HA3 and CTC4;
 - g) delivers flexible employment uses appropriate in the town centre;
 - h) delivers high quality public realm improvements, maximizing opportunities to “green” the town centre environment, including better integration of Camberley Park, supporting the ambition for a ‘town square’ and providing attractive places to dwell and space to accommodate outdoor events;
 - i) supports delivery of the Surrey Local Transport Plan 4 and any successors, and proposals in the Surrey Heath Local Cycling and Walking Infrastructure Plan;
 - j) delivers improved accessibility and permeability for all, both within the town centre and between the town centre and the wider settlement with a focus on improved east/west connectivity and in line with Policy CTC3;
 - k) delivers good quality design, in line with existing and future national and local Design Guidance and Design Codes and published masterplanning;
 - l) conserves and enhances the Victorian/Edwardian historic character and setting of the High Street, including key views;
 - m) relocates civic uses, the library and/or Camberley Theatre to more central locations should opportunities arise within the town centre;
 - n) includes provision of the most up to date digital technology; and
 - o) supports actions that deliver a low carbon town centre and provide appropriate adaptation and mitigation measures in relation to climate change in



accordance with Policies SS3a and b including:

- i. provision of electric vehicle charging points;
- ii. urban greening and shading; and
- iii. delivery of low carbon heating.

4.10. National planning policy emphasises the need to ensure that town centres are rapidly adaptable to change, allowing them to grow and diversify in response to changing market conditions whilst maintaining their role at the heart of the communities they serve. As set out elsewhere, the Government has introduced a range of planning reforms to support a more flexible approach to town centre uses. These reforms mean that the Council has less influence on the mix of uses in the town centre. However, the Council can still influence the type of development that comes forward where planning permission is required and also as a significant landowner. The Council also works in partnership with others to support changes which add to the vitality and viability of the town centre.

4.11. Previous planning documents have identified a number of physical challenges within Camberley town centre. These include:

- Legibility: Very little of the town centre is visible to passing trade – this includes the busy A30 London Road frontage. Enclosed shopping centres on Princess Way and Obelisk Way make it harder to navigate, and separating the two major leisure and entertainment ‘hubs’ on the High Street and Knoll Road, particularly at night when through access is closed. Poor environment from the rail station through to the town centre.
- Service areas: Significant open service areas impact upon public open space and traffic movements, particularly from deliveries.
- Public realm: Opportunities to improve the public realm have been identified and a number have now been delivered including in the High Street.

Camberley Town Centre Analysis

4.12. In 2019 the Council commissioned Lambert Smith Hampton to prepare a Town Centre Uses and Future Directions Study (Town Centre Uses Study) to inform the Local Plan, with a focus on Camberley Town Centre. Evidence in the 2020 Town Centre Uses Study suggests that given the changing nature of retailing, there is no Borough wide capacity for new retail floorspace over the plan period for either comparison or convenience goods after taking account of existing commitments and vacant floorspace.



- 4.13. The Town Centre Uses Study found that for comparison goods the proportion of online sales across Camberley town centre (pre-covid) was slightly higher than the national average. The Study also identified that the current provision of comparison outlets as a proportion of total outlets in Camberley Town Centre (43.9%) is above the national average of 37%. Comparison goods floorspace represented 50% of total floorspace in the town centre, which is also above the national average figure of 42.6%. Although the strong provision of comparison retailing floorspace in Camberley is a positive indicator, the Study suggests that it could also represent a weakness given current trends in the retail sector and the proportion of online sales. Camberley could therefore be vulnerable to the loss of comparison goods space over time and this emphasises the need for the town centre to provide much more than a retail role to ensure that it continues as an attractive place to live and visit.
- 4.14. Despite the current challenges facing town centres, the Study suggests that Camberley still performs well and has the potential to continue to do so. It concludes:
- “It [Camberley Town Centre] 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.”*
- 4.15. The Town Centre Uses Study also recognises the value of the library and Camberley Theatre in drawing people into the town centre, especially in view of the wider role of activities that libraries now host. Should appropriate opportunities arise for these uses to be relocated into a more central town centre location then this will be strongly supported subject to compliance with other policies. Relocation of the Council offices to a more central location will also take place over the plan period to allow the release of land east of Knoll Road for development. The relocation of key civic and cultural uses will take place with engagement with relevant partners such as Surrey County Council and the Theatres Trust.

Delivery

- 4.16. A number of sites/areas are identified for residential led development in the town centre as set out in Policies HA1, 2 and 3 of this Plan. These sites offer scope for significant change and an increase in new homes in the town centre, particularly at London Road Block and Land East of Knoll Road. The Policies Map inset map for Camberley shows the distribution of allocated sites in the Town Centre.



- 4.17. Development of the London Road Block is being led by the Council and offers the potential to provide an improved 'gateway' into the town centre as well as a mix of uses including residential and public open space. Land at Camberley Station, Pembroke Broadway is also allocated for residential development and provision of an improved rail station. This is another important gateway into Camberley and redevelopment provides the opportunity for an improved visitor experience and improved links with the rest of the town centre.
- 4.18. Camberley is a relatively compact centre, close to residential areas within Camberley itself as well as the new Places Leisure Camberley Centre which sits just outside the town centre boundary. The Council supports the principles behind the [20 Minute Neighbourhood](#) – this can be summarised as 'a complete, compact and connected neighbourhood, where people can meet their everyday needs within a short walk or cycle'. This includes characteristics such as:
1. diverse and affordable homes;
 2. well connected paths, streets and spaces;
 3. schools at the heart of communities;
 4. good green spaces in the right places;
 5. local food production;
 6. keeping jobs and money local;
 7. community health and wellbeing facilities; and
 8. a place for all ages.
- 4.19. Support for the 20 Minute Neighbourhood is also set out in the [Surrey Local Transport Plan 4](#). Employment uses are also an important part of the town centre mix of uses. Whilst some office floorspace has been lost to residential uses the appropriate conversion of town centre floorspaces to employment space, particularly where this allows for shared workspaces and support for small businesses will be encouraged.
- 4.20. Opportunities for greater digital connectivity are also being explored for the Town Centre including the potential for The Square to be 5G enabled.
- 4.21. The Council's Climate Change Study identifies opportunities for Camberley town centre to deliver low carbon heating and provide further adaptation and mitigation measures. These include opportunities to 'green' the environment and to provide urban shading as well as design issues relating to building orientation and layout. In line with the National Planning Policy Framework, 2023, design codes will be produced for Camberley Town Centre. These will be produced separately to the Local Plan.



- 4.22. Green spaces and vegetation including street trees are important in providing a wide range of environmental and quality of life benefits for those who live, work and visit the area. The Council will seek to ensure that developments include green features and link and enhance the existing network of green spaces. Where appropriate, the town centre site allocations policies set out the requirements for improvements to green infrastructure.

Policy CTC2: Camberley Town Centre Primary Shopping Area

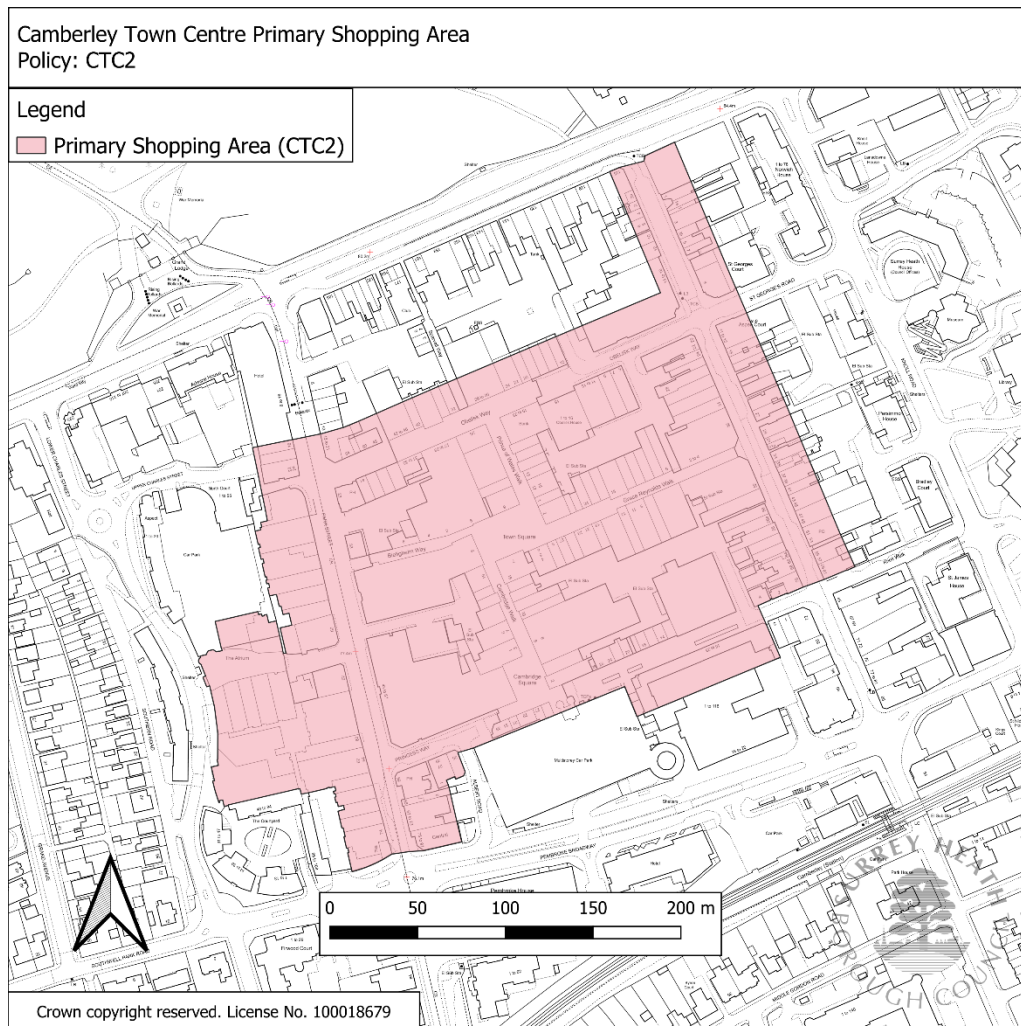
- 4.23. The Primary Shopping Area (PSA) is where the main retail development (Use Class E(a)) in Camberley town centre is concentrated and where the Council considers that such concentration should remain. This includes The Square, the High Street and Park Street which contain frontages with different characters and scale and mix of uses but which collectively provide an important shopping focus.
- 4.24. The Primary Shopping Area boundary has been informed by the Town Centre Uses Study and the 2021 Retail Survey and is set out on the Policies Map and the Plan below.

Policy CTC2: Camberley Town Centre Primary Shopping Area

- 1) Within the defined Primary Shopping Area in Camberley town centre, development will be permitted which satisfies the following criteria:
- a) It supports or enhances the centre's vitality and viability;
 - b) It is for a Class E Use, which maintains an active ground floor frontage, generates footfall and supports the retail function of the primary shopping area;
 - c) A change of use from retail (Class Ea) will not result in the over concentration of non retail uses to the detriment of the retail function and attractiveness of the Primary Shopping Area.



Figure 6 – Camberley Town Centre Primary Shopping Area



4.25. National planning policy emphasises the need to ensure that town centres are rapidly adaptable to change and this message has been strengthened by Government in the light of the Covid-19 pandemic. To support flexibility and change in town centres, in September 2020 the Government introduced changes to the Use Classes Order, introducing a new E Use Class (Commercial business and service uses) which incorporates uses including shops, financial and professional services, cafes and restaurants, office uses, health and nursery facilities and indoor recreation uses such as gyms.



- 4.26. Following this, a range of additional permitted development rights have been introduced allowing conversion of most Class E uses to residential, subject to meeting relevant criteria such as size limits. The impact of these changes in terms of the ability of the Council to influence the type of uses in the town centre is significant. This will now be largely dictated by the market unless permission is required due to a planning condition or other restriction.
- 4.27. 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 2023 which supports defining primary shopping areas and policies for the uses that will be permitted within them.



Policy CTC3: Movement and Accessibility

- 4.28. Camberley Town Centre is accessible by roads, rail, pedestrian footpaths and cycleways. However, although there have been a number of highway and public realm improvements to, and within the town centre, there are opportunities to improve permeability, particularly by improving east-west connections across the town, to encourage greater access by active travel modes and to improve public transport infrastructure. Ease of access is vital if Camberley is to remain an attractive destination for residents and visitors and to enable the increasing number of town centre residents to travel using a choice of travel modes.

Policy CTC3: Movement and Accessibility

- 1) The Council will work with partners including Surrey County Council, Network Rail and the rail and bus operators to improve the accessibility of the town centre with priority given to providing a safe and connected environment for pedestrians and cyclists and for improved access by public transport.
- 2) As appropriate to its nature, scale and location, new development within the town centre will be required to provide or make a financial contribution towards:
 - a) improved pedestrian and cyclist infrastructure, including improvements identified in the Surrey Heath Local Cycling and Walking Infrastructure Plan, and connectivity to and through the town centre including improved east-west connections;
 - b) improved accessibility by bus;
 - c) enabling of better integration of transport modes in particular bus, train and taxi to include an improved transport interchange and rail station facilities at Pembroke Broadway;
 - d) enabling of effective circulation of traffic around and to the town centre, including use of signage to minimise congestion;
 - e) provision of on and off street parking facilities, including for taxis, the disabled and motorcycle and cycle in accordance with adopted standards;
 - f) works to accommodate any other impacts upon the highway network arising from the development; and
 - g) improved legibility;

- 4.29. For town centres, ease of accessibility has an important impact on attracting customers and businesses. Good quality access to and within Camberley town centre by walking, cycling and public transport as well as access by road, increases the potential number of people who will choose to visit and therefore its attractiveness to businesses.



- 4.30. Collectively, the matters in Policy CTC1 and CTC3, along with delivery of the site allocations will help to support the principles of a compact and well-connected centre, reducing the need to travel. The street interviews conducted as part of the Town Centre Uses Study identified that 60% of respondents travelled to the centre by car but notably over 50% of journeys were less than 10 minutes suggesting that there is opportunity to increase the use of active travel modes into the town centre.
- 4.31. Surrey County Council as local highway authority, has prepared a new Local Transport Plan (LTP4) which seeks to deliver a carbon net zero transport system by 2050. LTP4 seeks to **avoid** the need for travel, **shift** travel to sustainable travel modes and **improve** emissions intensity and energy efficiency. The Council will work closely with Surrey County Council to identify opportunities to deliver improvements to accessibility by active travel modes and public transport that arise through the new LTP4 including the delivery of mobility hubs to support sustainable travel for onward journeys and through the Bus Service Improvement Plan, 2021.
- 4.32. Surrey County Council in partnership with Surrey Heath Borough Council, is currently preparing a Local Cycling and Walking Infrastructure Plan (LCWIP) for Surrey Heath Borough which will help to inform and deliver additional active travel improvements. The LCWIP identifies a number of proposed cycle corridors through Camberley as well as a Core Walking Zone covering Camberley Town Centre.
- 4.33. Funding from National Highways has been received by the County Council to progress feasibility design works and appraisal for a Camberley to Frimley Cycleway Scheme. This Fund seeks to promote schemes that encourage more travel by active travel modes (cycling and walking) locally. The feasibility work explored the possibility of creating a continuous cycle route between Camberley and Frimley. Further funding from National Highways is now in place to complete all work required through to the end of the detailed design stage. It is expected that this will be completed early 2024.
- 4.34. Site allocations that lie within or close to Camberley Town Centre in Policy HA1 set out the site specific requirements to deliver accessibility improvements to the town centre.



Policy CTC4: Land East of Park Street, North of Princess Way

- 4.35. This site lies in a central location within Camberley town centre and along with the London Road Block and Land East of Knoll Road provides an important site for the future regeneration of Camberley town centre.

Policy CTC4: Land East of Park Street, North of Princess Way

- 1) Development proposals are required to deliver a design-led mixed use redevelopment scheme that:
 - a) Incorporates active town centre uses at ground floor level;
 - b) Provides a mix of town centre uses such as office, civic, residential, cultural/arts and leisure uses above;
 - c) Utilises high-quality architectural design to improve engagement with the street-scene, providing distinctive and accessible public realm within this prominent central location;
 - d) Provides an enhanced gateway into Camberley Town Centre from Park Street incorporating an attractive promenade that leads to The Square Shopping Centre and an attractive link to Princess Square;
 - e) As appropriate, supports active travel improvements and demonstrates sufficient car and cycle provision is available for the proposed uses, having regard to its town centre location and adopted standards.

- 4.36. This 0.39 Ha site is owned by the Borough Council and was formerly occupied by House of Fraser, NatWest Bank and Café Nero. It currently provides access onto Park Street, into The Square Shopping Centre and to a service area to the rear.

- 4.37. Based on its central town centre location the site is has potential to support the broader regeneration of Camberley Town Centre. Its location makes it appropriate for a mix of town centre uses including retail, civic, office, residential, cultural /arts and leisure uses as well as providing the opportunity for improved linkages and improved public realm. The relocation of the Borough Councils civic offices at Knoll Road is one option being progressed for this site. This would support the delivery of the allocation of Land East of Knoll Road (Policy HA3) for housing and the wider regeneration of the town centre.



- 4.38. The site occupies a prominent corner position and development proposals will be expected to deliver design, biodiversity and public realm improvements taking advantage of this prominent position. These should establish a strong sense of place and create an attractive, welcoming street scene as well as improved linkages into The Square Shopping Centre.

Economy

- 4.39. Surrey Heath is characterised by a buoyant economy and a diverse economic base, with high technology industries strongly represented alongside traditional and advanced manufacturing. A key strength of Surrey Heath's economy is in the diversity of the sectors represented. Strong employment sectors include: specialist engineering and manufacturing; medical technology; information technology; financial / business services; logistics / distribution and health. The Borough Council also has an active Economic Development Team, providing inward investment support and support to growth and retention of local businesses.
- 4.40. The Borough forms part of a functional economic area, comprising the three local authority areas of Hart, Rushmoor and Surrey Heath. The three authorities have strong economic linkages and form part of a commercial property market, focused on the Blackwater Valley area. To date, the borough has fallen within the Enterprise M3 Local Enterprise Partnership (LEP) area, but from 2024 onwards economic development functions will transfer from the LEP to Surrey County Council. It is therefore important to view Surrey Heath's economy in the wider context of the functional economic area, as well as the county area and wider south east region.
- 4.41. The borough has an active business community with several prestigious and global firms located in the Borough. There are a number of businesses in the medical technology and pharmaceutical industries in Surrey Heath including Sandoz UK and UCB and the Research and Development sector is also well represented in the Borough, with companies such as Lantmannen Unibake, Jenoptik Traffic Solutions, and Zehnder Group. There is a well-established specialist and advanced manufacturing sector which includes companies such as STIHL, Amazon Filters, BAE Systems, SC Johnson, and Krispy Kreme. Businesses in the finance include Bank of America Merrill Lynch, and Cennox.
- 4.42. As of 2019, [Nomis](#) highlighted that nearly 90% of businesses in the Borough were micro businesses, , driving future economic growth in Surrey Heath. It is important that these types of organisations are supported and encouraged.



- 4.43. The Surrey Heath Economic Development Strategy 2023-2028 provides an ambitious road map for good growth and prosperity of the local economy from 2023 to 2028. It identifies opportunities for accelerated economic growth and resilience whilst, taking a proactive approach to mitigating the global, regional and local challenges impacting the Borough. The strategy contains a range of objectives spanning productivity, connectivity, property floorspace, net zero carbon, town centre regeneration, sustainable transport and access to employment.
- 4.44. National planning policy sets out the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. This should be achieved through the identification of sites to meet forecasted employment needs over the plan period. The NPPF also states the Local Plan should also be flexible enough to accommodate needs that are not projected over the plan period, enabling a rapid response to changes in economic circumstances.
- 4.45. The Surrey Heath Employment Technical Paper 2019 (ELTP 2019) and the 2023 update (ELTP 2023) found there were net losses of office (E(g)(i) Use Class) and industrial (B2 Use Class) floorspace in Surrey Heath over the period 2005-2019, although net gains were made in storage and distribution (B8 use class) and flexible (mixed B) employment floorspace. High residential land values in the Borough and significant land constraints can result in increased pressure on employment floorspace from other uses that are not in a B or E(g) use class. Maintaining a supply of employment land is essential for Surrey Heath's economy, which contributes to the Borough's high standard of living.
- 4.46. Policies in the Local Plan aim to ensure that there is sufficient employment land and buildings of the right type to help deliver sustainable economic growth in the Borough, supporting the Borough's position as a prosperous economic area. To help achieve this, the Local Plan's economic policies aim to:
1. Enhance existing, and enable the provision of new, high-quality employment space;
 2. Direct new employment provision to the most appropriate locations; and
 3. Support key employment sectors and micro businesses.
- 4.47. In addition to this, other policies of the Local Plan aim to ensure the sustainability of new and redeveloped employment floorspace. This includes the requirements for high quality and more energy efficient building stock, through the BREEAM standards of Policy DH8 (Building Emissions Standards), renewable energy standards of Policy E5 (Renewable and Low Carbon Energy and Heating), integration of sustainable transport, digital and green infrastructure in Policies IN1, IN2, IN3 and IN5, as well as addressing and being resilient to climate change through Policy SS3a and SS3b (Climate Change Mitigation and Adaptation). This will help ensure the borough continues to be viable to new and existing businesses and remains competitive with surrounding areas.



- 4.48. It is recognised that changes to the Use Classes Order that came into effect on 1st September 2020 mean that some uses in the defined Employment Areas may not need planning permission to change to other Uses. This specifically applies to employment uses that previously fell within Use Class B1 and which now fall within Use Class E along with other uses including shops, financial and professional services, cafes and restaurants, gyms, nurseries and health centres. However, national planning guidance makes clear that Class E Uses are principally suited for town centres. In light of the need to continue to ensure that there is a balanced supply of housing and employment land, it is considered appropriate to seek to protect Employment Uses (as defined in the Glossary - those falling within Use Classes B2, B8 and E(g)) within defined Employment areas where planning permission is required and where the evidence supports the need to do so.

Policy ERI: Economic Growth and Investment

Policy ERI: Economic Growth and Investment

- 1) The sustainable growth and retention of businesses and inward investment into Surrey Heath will be supported by:
 - a) supporting the development and intensification of Employment Uses in Strategic and Locally Important Employment Sites;
 - b) preventing a net loss of existing floorspace in Employment Use in Strategic and Locally Important Employment Sites;
 - c) supporting proposals for intensification of, or new employment uses elsewhere in the Borough where it does not have an unacceptable adverse impact on local amenity including through transport movements, emissions, hours of operation and lighting and is compliant with other development plan policies;
 - d) encouraging the growth of small and micro businesses by protecting employment units capable for use by a small business or industry and supporting the siting of small to medium size employment units in Strategic and Locally Important Employment sites or other appropriate locations;
 - e) encouraging development of the rural economy in accordance with Policy ER5 (Rural Economy).
- 2) Development proposals on land within Strategic or Locally Important Employment Sites will be supported where the proposed use is an 'Employment Use' and would be compatible with the existing businesses on the site.
- 3) Employment uses in Class E(g) on Strategic and Locally Important Employment Sites will be controlled by condition and/or legal agreement where up to date evidence demonstrates that there is a need to protect these uses in perpetuity.



Policy ERI: Economic Growth and Investment

- 4) Large scale developments should deliver local skills and training initiatives, unless it can be demonstrated that this is not feasible.

- 4.49. Planning for economic growth will ensure the Local Plan will support the continued development of a strong local economy and can continue to provide job opportunities for residents of Surrey Heath and surrounding areas.
- 4.50. Forecast job growth in Surrey Heath is 5,400 net additional jobs by 2040, as set out in the [Surrey Heath Technical Paper \(2023\)](#). Floorspace modelling for the period of 2021 to 2040 is set out in the Employment Land Technical Paper ELTP 2023, which uses a variety of data trends and sources. Modelling based solely on future jobs growth scenarios forecasts a considerable reduction in need for Industrial floorspace (E(g)(iii) and B2), and positive needs for Logistics floorspace (B8) and office floorspace. If it were assumed that demand in one landuse category can be supplied from losses in another, the overall total employment use floorspace need is forecast to be only 1,731sq.m up to 2040. However, taking account of property market insights and recent local historic delivery trends up to 2023, the forecast floorspace requirements for Surrey Heath are advised to be for a modest demand in office floorspace (between 6,500sq.m to 15,800sq.m) and a larger demand for Industrial and Storage and Distribution (between 38,000sq.m to 63,000sq.m), although demand for office uses is not representative of near-term commercial property trends.
- 4.51. Expressed in terms of land area, the above floorspace needs translate to a requirement for between 10 to 19 hectares of land for employment landuses, taking account of floorspace to land-take conversion rates for the different categories of employment land types. For example, employment floorspace in an E(g)(i)(Office) use class requires a lower amount of land-take than employment floorspace in a B8 (Storage and Distribution) use class as evidenced in the [Employment Land Technical Paper 2023](#).
- 4.52. Furthermore, after accounting for delivery in the plan period and occurring since the completion of the Employment Land Technical Paper 2023 up to February 2024, the projected needs are adjusted to range from between 11,000 to 20,300sqm for office floorspace and between 4,600 to 22,600 sqm for Industrial and Logistics space, as a result of permission granted for significant redevelopment at Watchmoor Business Park, involving a loss of office space and a gain in industrial and logistics floorspace . The details of this are set out in the Employment Topic Paper (2024).



- 4.53. The Surrey Heath Employment Supply Assessment 2023 demonstrates that there are a variety of land development and redevelopment opportunities within the established employment areas. This includes a limited scale of developable land and other significant opportunities in the re-development of vacant office buildings, along with some vacant and under-occupied B2 and B8 use buildings.
- 4.54. There has been a considerable scale of permissions granted to date within the plan period focused on net additional E(g)(iii)/B2/B8 employment floorspace, and simultaneously there is low confidence in demand for office space growth. As such, the residual forecast need for industrial and logistics employment floorspace, is planned to be met from redevelopment and intensification of older or poorer quality stock and underutilised or redundant land at Strategic and Locally Important Employment Sites, and modest additional Employment Uses elsewhere in the borough in appropriate locations.
- 4.55. The above evidence for employment land in Surrey Heath has been prepared since the Covid-19 pandemic, but nevertheless, the office market particularly remains subdued and further changes to the way in which people work and other structural changes in the economy such as future e-commerce trends and Brexit impacts will be kept under close review.
- 4.56. Through the protection of Strategic and Locally Important Employment Sites, the Local Plan will help to ensure the Borough's economy can continue to grow. In particular this will also help retain available employment land for businesses that are aligned with the economic development priority sectors of pharmaceuticals and medical technology, specialist/advanced manufacturing, information technology including cyber security and creative technologies, financial/business services and green and low carbon technologies and businesses, enabling them to remain an important economic presence within the Borough. These sectors fall within key business sectors identified by [Invest in Surrey](#).
- 4.57. The Council wishes to create an environment where growing businesses can flourish, adding to the diversification of organisations within the Borough.
- 4.58. Proposals that provide appropriate accommodation for micro businesses and small growing businesses will be supported where they are located on Strategic or Locally Important Employment Sites, or other appropriate locations in the Borough. The loss of established employment floorspace providing suitable accommodation for micro and growing businesses will generally be resisted, unless it can be demonstrated that the floorspace is no longer required. This must be supported by evidence of an active and appropriate marketing exercise undertaken for a period of at least twelve months which demonstrates that the premises are not reasonably capable of supporting small scale businesses.



- 4.59. As a minimum, the evidence should include: the length of time on the market, type of lease offered and sale price or rent levels advertised. However, in compliance with Policy ER2, proposals for changes of use from Employment Uses to non Employment Uses at Strategic Employment Sites will not be permitted, unless they would provide small scale complementary use(s) that are not detrimental to the function and operation of the Strategic Employment Site.
- 4.60. A key element of economic success is having a skilled local workforce and providing opportunities to improve educational attainment and training. Where feasible, developers will be required to commit to construction training (and other forms of training if appropriate) as part of their project and to make their intentions clear in their planning applications, through for example the inclusion of, or commitment to, an employment and skills plan. Determination of what constitutes large scale development in criterion 4 will be determined on a case by case basis but as an indication will include developments over 50 dwellings (net) or new commercial floorspace over 1,000m² (net).



Policy ER2: Strategic Employment Sites

- 4.61. The Borough's Strategic Employment Sites are predominantly located in the West of the Borough, in the built up areas of Camberley and Frimley. The Strategic Employment Sites in these areas are generally large to medium sized business and industrial parks with a significant number of occupiers ranging from multinational companies to small and medium enterprises, and local businesses. Such sites benefit from good access to the strategic road network as they are located close to the A331 and junction 4 of the M3. In addition, many of the sites are located within 800 metres of Camberley and Frimley stations, and Blackwater station in Hart District.

Policy ER2: Strategic Employment Sites

- 1) To contribute towards meeting the future economic growth needs of the Borough and the wider Functional Economic Area, the following sites are designated as Strategic Employment Sites as defined on the Policies Map, to be afforded the highest protection and safeguarding for Employment Uses:
 - a) Admiralty Park, Camberley
 - b) Albany Park, Frimley
 - c) Erl Wood, Windlesham
 - d) Fair Oaks Airport and Chobham Business Centre, Chobham
 - e) Longcross Studios, near Chobham
 - f) Highams Park, Windlesham
 - g) Frimley Business Park, Frimley
 - h) Lyon Way, Frimley
 - i) Watchmoor Business Park, Camberley
 - j) Yorktown Business Park, Camberley.
- 2) The redevelopment and regeneration of these sites will be supported to provide floorspace for Employment Uses and supporting facilities that meets the needs of the market, with particular support for floorspace to meet needs of economic development priority sectors which primarily relate to Office, Research and Development, Light Industrial and General Industrial (Eg(i), Eg(ii), Eg(iii) and B2) landuses.
- 3) Small-scale proposals for changes of use or redevelopment to non-Employment Uses will be supported where they would provide complementary use(s) that are not detrimental to the function and operation of the Strategic Employment Site.



- 4.62. The Strategic Employment Sites are identified in the [Employment Land Supply Assessment 2023](#). The sites are all larger than 1.5 ha, are considered to fulfil a strategic function within the Hart, Rushmoor and Surrey Heath Functional Economic Area and have the greatest alignment to the economic development priority sectors.
- 4.63. Yorktown Business Park and Admiralty Park are identified in the Surrey Waste Local Plan as 'Industrial Land Areas of Search' and therefore as areas suitable for the development of waste facilities.
- 4.64. There are three Strategic Employment Sites located within the Green Belt: Erl Wood, Fairoaks Airport and Highams Park. These sites will need to satisfy the requirements of policies GBC1 and GBC2. These sites are bespoke, meaning they are occupied by site specific employers. The sites are strategic in importance to the Borough's economy, due to their alignment with economic development priority and niche sectors, and their size and scale.
- 4.65. Fairoaks Airport SES forms part of Fairoaks Airport, an operational general aviation airport. The SES designation excludes that part of the site that comprises the runway and wider outlying areas. The whole site lies within the Green Belt. The defined SES contains a range of uses associated with the aviation sector including specialist aviation and avionics engineering and maintenance enterprises, as well as a range of businesses not related to the aviation industry. The site is identified as being of strategic importance for employment, recognising the number of businesses at the site and the requirement in the NPPF to take account of the economic value of general aviation and the Government's General Aviation Strategy.
- 4.66. The businesses and industries that have chosen to locate in Surrey Heath, and those that wish to relocate to the Borough require suitable land and premises to accommodate them. Therefore it is important that employment land is protected, especially at sites with a strategic function and employment accommodation types that businesses and industries require. The protection of such sites is also essential to meet anticipated employment needs over the plan period.
- 4.67. It may be possible to introduce small-scale non-Employment class employment uses into the Strategic Employment Sites where they would provide complementary uses that would support businesses and employees. Examples of such complementary uses include cafés and sandwich bars that would cater for breakfast and lunchtime trade and creches to provide childcare for employees (provided that the creche was ancillary to the primary use). The operating hours of such uses would be restricted accordingly. Such uses can support the operation and function of employment sites and improve the offer available to prospective tenants/occupiers.



- 4.68. The judgement about operation will consider whether the proposed use would affect the ability of established businesses, or potential future Employment Use occupiers, to carry out their activities without constraints. The judgement about function will consider the role that the site plays in the supply of land to meet Employment needs over the Local Plan period.

Policy ER3: Locally Important Employment Sites

- 4.69. Locally Important Employment Sites are more evenly spread throughout the Borough than the Strategic Employment Sites. Such sites are recognised for the important role they play in servicing the local economy. They are generally smaller in size than the Strategic Employment Sites and often provide locations to support local businesses or valuable activities that may require separation or distance from other uses due to their impact on the character or amenity of the area through noise, odour, or visual detriment.

Policy ER3: Locally Important Employment Sites

- 1) To contribute towards meeting the future economic growth needs of the Borough, the following sites are designated as Locally Important Employment Sites as defined on the Policies Map, and will be given protection against loss to non Employment uses:
 - a) Bridge Road Trade and Industrial Park, Camberley
 - b) Linsford Business Centre Mytchett
 - c) Mytchett Place, Mytchett
 - d) SC Johnson, Frimley Green
 - e) St Georges Industrial Estate and Helix Business Park, Camberley
 - f) Tanners Yard, Bagshot
- 2) The redevelopment and regeneration of these sites will be supported to provide floorspace for Employment Uses that meet the needs of the market.
- 3) The change of use or redevelopment of land and buildings in Employment Use to non-Employment Uses within the defined Locally Important Employment Sites will only be permitted where it can be demonstrated that:
 - a) there are no strong economic reasons to retain the Employment Use; and
 - b) market signals indicate that the premises / site are unlikely to come back into an Employment Use; and
 - c) the proposal would generate a level of employment that is at least equivalent to the existing use; and
 - d) the proposal would not be detrimental to the function and operation of the wider site; or



Policy ER3: Locally Important Employment Sites

- e) the site is not appropriate for the continuation of its present use or any Employment Use due to a significant detriment to the environment or amenity of the area.

- 4.70. The protection and retention of the Borough's Locally Important Employment Sites is crucial to maintain a supply of employment land and premises that will meet the economic needs of the Borough and wider Hart, Rushmoor and Surrey Heath Functional Economic Area (FEA). The Locally Important Employment Sites are identified on the Policies map. The sites are all larger than 0.3 ha in size.
- 4.71. The loss of land within Locally Important Employment Sites to non-Employment Uses could generate additional pressure for the release of land for Employment Uses in less acceptable locations. Policy ER3 therefore contains criteria for considering proposals for non-Employment Uses at these sites.
- 4.72. The regeneration and intensification of existing employment sites will be supported to allow businesses to expand and enable the provision of modern employment stock to replace properties that have reached, or are reaching, the end of their functional economic life. However, it is also recognised that some of the Locally Important Employment Sites offer suitable locations for businesses that do not require modern grade A accommodation, and benefit from the lower rents or leases provided by lower grade accommodation. Sites located in rural areas beyond the Green Belt and outside of settlement area boundaries, such as Mytchett Place, will need to meet requirements of Countryside Policy GBC4.
- 4.73. Policy ER3 identifies that market signals will be taken into account when determining applications for the change of use within a Locally Important Employment Site to a non-Employment Use. In addition, the Council requires applicants to demonstrate that there would be no strong economic reasons why the premises or site should not be lost to alternate uses.
- 4.74. An indicative list of the evidence that the Council will require to be submitted with proposals for non-Employment Uses at Locally Important Employment Sites is detailed below:

Market Signals Evidence

- I. An active and appropriate marketing exercise must have been undertaken for a period of at least twelve months which demonstrates no interest from prospective buyers/tenants. This must include the following evidence, as a minimum:



- a) the length of time on the market,
- b) type of lease offered;
- c) sale price or rent levels advertised;
- d) information on premises similar to those that are proposed to be lost which are being marketed in the local area; and
- e) the findings of the most recent Employment Land Review or other equivalent study and annual monitoring data on employment land will also be used to determine whether there is a need for such employment premises (or sites) to meet future needs.



Demonstrating that There Are No Strong Economic Reasons Against the Change

1. Whether the proposal would undermine the operation of the wider employment site by negatively impacting upon established neighbouring uses;
2. Whether the proposals would harm the businesses currently established at the site (for example, by requiring them to relocate prior to the termination of their lease when no suitable alternative accommodation is available in the local area, and it can be demonstrated that the relocation of the business would impact upon its operation and sustainability);
3. Whether the proposal would undermine the function of the employment site by affecting the supply of locally important employment land or premises available to meet employment needs over the plan period;
4. Whether the site is suitable for contributing towards meeting the needs for employment land, as identified in the most recent Employment Land Review or equivalent study, and;
5. If the site is occupied, information on the number of businesses occupying the site/premises, the remaining lease length for each of the occupiers, and evidence that suitable alternative accommodation is available in the local area.



Policy ER4: Yorktown and Watchmoor Business Parks

- 4.75. Yorktown Business Park and Watchmoor Business Park are a large employment site located in the west of Camberley covering an area of approximately 53 hectares. Due to Yorktown's size, redevelopment opportunities, and wide range of accommodation attracting both small and medium-sized enterprises (SMEs) and larger organisations, the site has the potential and capacity to attract future economic development to Surrey Heath, supporting the growth needs identified in the Surrey Heath [Employment Land Technical Paper 2023](#). The boundary of Yorktown Business Park has been expanded to incorporate new development along the A331 to the south of the site. Watchmoor Business Park is the second largest business park in the Borough and contains a larger proportion of office uses and has excellent access to strategic road network.

Policy ER4: Yorktown and Watchmoor Business Parks

- 1) The role of Yorktown and Watchmoor Business Parks as the Borough's largest employment sites and most extensive cluster of industrial uses is recognised. Proposals for redevelopment or enhancement for Employment Uses, including the refurbishment of existing stock, and subdivision of larger units to provide multiple units will be supported.
- 2) Proposals including provision of a net increase in the overall amount of Employment Use floorspace will be supported.
- 3) The redevelopment of derelict or underutilised land for Employment Uses will be supported, provided proposals would not result in a net reduction to the overall amount of Employment floorspace at the site.
- 4) Proposals will be required to support the delivery of a structured landscape setting incorporating green boundary treatments, high quality materials and good design, in line with the Yorktown Landscape Strategy Supplementary Planning Document.

- 4.76. Yorktown Business Park houses a diverse range of employment types. The site comprises industrial areas, business centres and trade parks. The majority of uses at the site are industrial or storage and distribution often with ancillary office uses. Employment buildings range from workshops and manufacturing units that date from the mid-20th century to large modern warehouses. Parts of the site have been upgraded and redeveloped in recent years. Many of the more recent developments consist of warehouse units with flexible office or industrial space.



- 4.77. The Yorktown Landscape Strategy Supplementary Planning Document (SPD) provides a landscape framework to guide development in the Yorktown and Watchmoor Park areas of Camberley. The purpose of the Landscape Strategy is to improve the environment and assist the regeneration of the Yorktown area. This will be achieved through requiring specific landscaping and design principles to be implemented as part of development proposals or through the enhancement of existing sites.

Policy ER5: Rural Economy

- 4.78. There are a number of businesses located within the rural areas of Surrey Heath which make a positive contribution toward the rural economy including small rural based enterprises and a number of larger employers. The Surrey Heath Economic Development Strategy 2020 identifies that the Borough has a vibrant micro economy in both the urban and rural areas. The Strategy identifies under the 'Prosperity' theme that the Council will work with partners to support both the urban and rural economy through strategic development planning and economic growth. This Policy does not apply to proposals for economic uses at Strategic or Locally Important Employment Sites that are in rural areas, which are covered by Policies ER2 and ER3 respectively.

Policy ER5: The Rural Economy

- 1) Within the countryside, including the Green Belt, development proposals for economic uses located outside of Strategic or Locally Important Employment Sites will be supported which:
 - a) enable the continuing sustainability or expansion of an existing business or enterprise;
 - b) are compatible with any existing agricultural or farm operation;
 - c) are consistent with Policies GBC1, GBC2 and GBC4, as relevant, and provide for a scale and use which does not conflict with wider countryside and Green Belt objectives;
 - d) is compatible with the rural character and does not have an unacceptable adverse impact on local amenity;
 - e) accommodate incidental uses such as car parking and storage such that the visual impact is minimised;
 - f) are to be accommodated within a building which is of permanent construction, structurally sound and capable of conversion without major alterations, adaptations or reconstruction for the use proposed.
- 2) Where it is demonstrated that the proposed use cannot be accommodated within an existing building, proposals for replacement or new buildings for farm diversification or economic purposes will be supported where they meet above



Policy ER5: The Rural Economy

criteria a) to e) and:

- a) the proposal is justified by a business case providing evidence of need for the scale of the development proposed and demonstrating that the business is viable;
 - b) any building to be replaced is of a permanent construction;
 - c) priority is given to siting the replacement building on previously developed land.
- 3) Within settlements in the rural areas (as defined under Policy H9) development for economic uses will be supported which are of a use and character appropriate to the proposed site and to the scale of the settlement and which do not have an unacceptable adverse impact on local communities particularly in terms of traffic, delivery, customer and staff parking, noise, lighting and visual impact.

- 4.79. The National Planning Policy Framework (NPPF) emphasises that planning policies should support sustainable economic growth in rural areas by taking a positive approach to new development. Local Plans should promote a prosperous rural economy by supporting the sustainable growth and expansion of all types of business and enterprise in rural areas.
- 4.80. Within the rural areas in Surrey Heath there are a range of economic uses. The rural economy has an important role to play in the overall economic prosperity of the Borough and contributes to economic diversification broadening the overall mix of employment uses.
- 4.81. The need for new jobs, and support for existing businesses is not limited to the urban areas and Strategic and Locally Important Employment Sites. There are existing rural businesses which may need to expand or re-locate which are vital to local employment provision and local services in rural areas. This includes farm diversification schemes.
- 4.82. Diversification of an agricultural use can help to sustain agricultural uses, increase household income and provide job opportunities.
- 4.83. The re-use and adaptation of non- residential buildings in countryside and Green Belt locations can have a positive role to play in maintaining stewardship of rural areas and in providing opportunities for bringing redundant buildings into productive economic use.



- 4.84. As such the Borough Council will support the rural economy, through positive support for appropriate farm diversification schemes and the re-use or adaptation of existing buildings or where appropriate, replacement buildings for economic purposes. Diversification or economic development could include allowing re-use or replacement buildings for small scale employment opportunities in traditional skills or crafts, farm based food packaging, small scale offices, small scale light industrial or low impact storage as well as for community and public uses.
- 4.85. Whilst recognising the value of supporting appropriate economic development in rural areas, the Council is mindful of the need to ensure that development does not impact upon the purposes of the Green Belt or the character or function of the countryside, as well as the need to consider other amenity issues such as the impact of noise and lighting and on highways. Proposals for economic development that would require extended, new or replacement buildings in the countryside or Green Belt will need to be accompanied by a Business Plan providing justification for the proposed development including for example, justification for the size of the premises required, evidence of viability and the availability of suitable buildings in more sustainable locations as well as availability of buildings for conversion.
- 4.86. Within settlements in the rural areas a more flexible approach will be taken having regard to other Policies in this Plan and to the need for any proposed economic use to be appropriate in terms of scale and siting having regard to the proposed location, the scale of the settlement and to the impact on issues including highways, local amenity and design.

Policy ER6: Frimley Park Hospital

- 4.87. Frimley Park Hospital is part of Frimley Health NHS Foundation Trust. The hospital is located in Frimley and provides elective (planned) and non-elective (emergency) surgery to people living in North Hampshire, West Surrey and East Berkshire.
- 4.88. The site is important to the Borough as both an employer and in providing healthcare to residents. Improvements to ensure continued high quality healthcare will be supported. However, the site lies within close proximity to residential properties which experience traffic and parking pressures arising from the use of the Hospital. Local congestion also impacts upon local businesses.



- 4.89. In May 2023, Frimley Park Hospital was named as one of five priority hospitals under the Government's New Hospitals programme with an ambition that it will be rebuilt by 2030. The Council will work closely with the Foundation Trust regarding any relocation and/or reuse of the site. However, there is no further information available at this stage to inform policies or allocations in the Local Plan so any future proposals will be considered through a Local Plan Review, or other Policy mechanism as necessary.

Policy ER6 Frimley Park Hospital and Healthcare Facilities

- 1) Development proposals for the retention and improvement of healthcare facilities at Frimley Park Hospital will be supported provided that:
 - a) the proposals form part of a comprehensive development strategy or business plan that ensures that the continued development of the hospital is properly coordinated;
 - b) where appropriate it is accompanied by a transport strategy to include:
 - i. a parking strategy;
 - ii. provision for an increase in the proportion of staff, patients and visitors who can access the hospital by public transport, cycling and walking; and
 - iii. the mitigation of any adverse impacts of traffic and car parking on the highway network and surrounding community;
 - c) there will be no significant detrimental impact on residential properties within the site or surrounding residential properties;
 - d) there is no detrimental impact to protected trees;
 - e) the proposal incorporates climate change mitigation measures, including on-site renewable energy generation, consideration for low carbon heating and making best use of existing combined heat and power (CHP) networks;
 - f) the proposal incorporates climate change adaptation measures, including reducing the risk of seasonal overheating through appropriate design having regard to any site specific constraints.
- 2) The provision of health care facilities will be supported within Camberley town centre and elsewhere in the Borough where they can be demonstrated to meet future needs.



- 4.90. Frimley Health NHS Foundation Trust operates across three main hospitals - Frimley Park in Frimley near Camberley, Heatherwood in Ascot and Wexham Park near Slough. The trust also runs outpatient clinics and diagnostic services from Aldershot, Farnham, Fleet, Windsor, Maidenhead, Bracknell and Chalfont St Peter to bring these services closer to local communities.
- 4.91. Frimley Park Hospital provides acute services to a population of 400,000 people across north-east Hampshire, west Surrey and east Berkshire. It serves a wider population for some specialist care including emergency vascular and heart attacks. Frimley Park also hosts the Defence Medical Group South East with military surgical, medical and nursing personnel working alongside the hospital's NHS staff providing care to patients in all specialities.
- 4.92. The Hospital is the Borough's largest employer, employing over 5,500 staff and providing a comprehensive range of services. In 2019 planning permission was granted for a new £30m diagnostics and inpatient building and associated internal road alterations. This will also provide additional bedspaces which will help to relieve bedspace occupancy which is currently higher than the national target.
- 4.93. Residential properties abound the wider hospital site to the north east (High Beeches and Denton Way) and west (Gilbert Road). The Grove, a grassed and treed open space that is common land lies to the south. Frimley Park Mansion, a Grade II Listed Building which provides a training facility and grounds, occupied by the Ministry of Defence is located to the south west, and sits within Frimley Park, a Registered Park and Garden which is also Grade II Listed. The M3 adjoins the hospital site to the north. A number of trees within the hospital site are subject to Tree Preservation Orders.
- 4.94. It will be important that any significant new proposals form part of a wider comprehensive masterplan to ensure that the Trust is making the most efficient use of space.
- 4.95. One of the main issues affecting the site is local congestion and parking impacts. Parking capacity on the site is limited and this has put pressure on parking in surrounding residential streets although much of this is now controlled through residents parking schemes. Congestion on local roads particularly at the Hospital roundabout and Toshiba roundabout is also having an impact on the attractiveness of Frimley as a place to locate for existing and new businesses. The Council will continue to work with Surrey County Council as the highway authority to seek measures to help reduce congestion on the surrounding road network.



- 4.96. Proposals will therefore be expected to be supported by detailed evidence of the impacts on the highway and parking demand on the site and how these will be mitigated. Measures to increase trips by active and sustainable modes of travel should be included, including through a Travel Plan. Proposals should also have regard to the Surrey Heath Local Cycling and Walking Infrastructure Plan.
- 4.97. Frimley Park Hospital and surrounding areas represent an area of great potential for low carbon heat networks, as identified in the Surrey Heath [Climate Change Study](#), with the Hospital representing a major source of heat demand. Development proposals for the site should incorporate climate change mitigation and adaptation measures in accordance with policies included in the Plan unless it can be robustly demonstrated that due to site constraints the need for healthcare requirements outweighs the ability to deliver such measures fully in accordance with Policy. Development will also deliver biodiversity and environmental net gains.
- 4.98. It is recognised that due to the constraints on site but also to make facilities accessible to the local community that healthcare facilities, including those not directly related to the Hospital are appropriate elsewhere in the Borough and are an important element of social infrastructure. The provision of some health facilities now fall within Use Class E and as such could be incorporated into premises previously occupied by town centre uses. The views of relevant health providers will be sought on major applications and development proposals for new healthcare facilities will be assessed against Policies in the Local Plan.

Policy ER7: Edge of Centre and Out of Centre Proposals

- 4.99. Edge of centre and out of centre retail and leisure proposals can play a role in providing a wider range of facilities within the Borough. However, such proposals can also impact on the vitality and viability of Surrey Heath's established retail centres if they are not managed effectively. This policy provides guidance on how the Council will assess proposals for main town centre uses outside of Designated Centres.



Policy ER7: Edge of Centre and Out of Centre Proposals

Sequential Test

- 1) Main town centre uses should be directed to Designated Centres in line with the sequential approach set out in the National Planning Policy Framework. Designated Centres include Camberley Town Centre and the Borough's District and Local Centres. Proposals for retail or other main town centre uses which are outside a Designated Centre and which are not on sites allocated for such uses will be subject to the sequential test.
- 2) If it can be demonstrated through the sequential test that there are no suitable sites available on edge of centre locations, sites will be given preference that are well connected to centres, are accessible by a range of sustainable transport options, including public transport, cycle, on foot and by people with disabilities.

Impact Assessment

- 3) Proposals for retail and leisure development over 280 sqm (gross) which are not within a Designated Centre and which are not on sites that are allocated for such uses must be accompanied by an impact assessment and will only be permitted if it is demonstrated that it will not cause a significant adverse impact on designated centres.

- 4.100. The NPPF sets two separate tests for certain proposals outside of Designated Centres. For proposals involving all main town centre uses there is the sequential test. For proposals involving retail and leisure uses there is the impact test.

Sequential Test

- 4.101. The NPPF requires main town centre uses to be located in Designated Centres, then in an edge of centre location and only if suitable sites are not available should an out of centre site be considered. The sequential test should be applied to applications for all retail or other main town centre uses that are located outside of Surrey Heath's Designated Centres and that are not located on other sites allocated for such uses. The sequential test need not be applied to proposals for retail or main town centre uses located on sites within Designated Neighbourhood Parades, as it is considered such uses are appropriate within these designated areas.
- 4.102. The sequential test should look Borough wide and will be applied to development proposals for retail and other main town centre uses, in order of locational preference:
- I. Sites located within Camberley Town Centre, District and Local Centres or other designations allocated for such uses;



2. Sites located within edge of centre locations, as defined in Annex 2 of the NPPF;
3. Other sites that are accessible by a range of sustainable transport options, including public transport, cycle, on foot, and by people with disabilities.

Impact Assessment

- 4.103. Applications for retail and leisure proposals that are outside a Designated Centre and are not on sites that are allocated for such uses must be accompanied by an impact assessment where they exceed 280 sqm gross as set out in this policy.
- 4.104. Surrey Heath's Designated Centres should continue to be active, viable and sustainable places providing a range of services for the catchments and communities they serve. The requirement for impact assessments will help to protect the trading performance, and overall vitality and viability of the Borough's designated centres from adverse impacts of new retail and leisure developments in less suitable locations.
- 4.105. The Surrey Heath Town Centre Uses and Future Directions Study (2021) sets out that retail and leisure developments lower than the NPPF size threshold of 2,500 sq. m. gross floorspace are likely to have impacts upon Designated Centres in the Borough. Additionally, developments below 2,500 sq. m. gross floorspace may impact cumulatively upon the Borough's Centres.
- 4.106. From the evidence in the Town Centre Uses Study, floorspace thresholds have been identified for retail and leisure development proposals that are outside of Designated Centres and are not on sites that are allocated for such uses. This has indicated that all applications for retail and leisure proposals in the Borough above a threshold of 280 sq. m. gross floorspace should provide an impact assessment.
- 4.107. Where impact assessments are required, they should include an assessment of:
 1. the impact of the proposal on existing, committed and planned public and private investment in Camberley Town Centre and any District or Local Centres; and
 2. the impact of the proposal on the vitality and viability of Camberley Town Centre and any District or Local Centres as specified in this policy, including consumer choice and trade.
- 4.108. Where an impact assessment requires review by an independent specialist as part of a planning application process, this will be paid for by the applicant.



Policy ER8: District and Local Centres

- 4.109. The Borough's District Centres at Bagshot and Frimley are the second tier of the centres hierarchy. They are smaller in terms of their size, catchment, and range of uses than Camberley Town Centre, but provide a quantity of retail units and variety of uses that would attract a wider catchment than the Local Centres and Neighbourhood Parades.
- 4.110. The District Centres provide a range of retail, community and leisure uses, and other services including cafés, restaurants, pubs, takeaways, pharmacies, banks and estate agents. They are important centres in the Borough that help promote sustainable patterns of use due to their location within populated settlement areas, and accessibility via public transport including both the bus and rail networks. The broad range of services and facilities available at District Centres is part of their attraction as a place to visit.
- 4.111. Local Centres are the third tier in the centres hierarchy. Many of the Local Centres in the Borough are the main centre within their local settlement area and therefore provide a focal point for local communities. Local Centres contain a smaller range of uses than District Centres, but still provide a choice of retail uses and important services that serve their local populations and can be accessed by public transport via the bus network.

POLICY ER8: District and Local Centres

- 1) The boundaries of the following designated District and Local Centres are shown on the Policies Map along with the Primary Shopping Areas. For Local Centres, the boundary of the Primary Shopping Area is the same as the boundary of the Local Centre.
- 2) The District Centres are:
 - a) Bagshot
 - b) Frimley
- 3) The Local Centres are:
 - a) Chobham
 - b) Frimley Green
 - c) Lightwater
 - d) Watchetts
 - e) Windlesham
- 4) Within District and Local Centres, proposals for retail uses (Class E(a) and F2(a)) will be permitted provided they are in proportion to the scale and function of the centre.



POLICY ER8: District and Local Centres

- 5) Proposals for other main town centre uses (as defined in the Local Plan Glossary) will be permitted provided they satisfy all of the following criteria:
 - a) They are appropriate to the Centre in scale and function;
 - b) They maintain or enhance the Centre's vitality and viability;
 - c) They provide an active frontage, if at ground floor level, such as a shop front or window display, which is in keeping with the character of the Centre;
 - d) They would not result in loss of amenity in terms of noise, fumes, vibrations, odour, or disturbance;
 - e) Does not result in an over concentration of non-retail uses to the detriment of the retail function and attractiveness of the Primary Shopping Area
- 6) The loss of main town centre uses at ground floor to other uses, including the loss of retail units within Class F2(a), will only be permitted where it can be demonstrated that the existing use is no longer viable. Such proposals must meet the above criteria and must also be supported by evidence that demonstrates active and appropriate marketing for a period of at least 12 months.
- 7) Residential development and B2 and B8 uses at ground floor level will not be permitted in District and Local Centres.
- 8) Residential development at first floor level or above will be supported within District and Local Centres. Uses above ground floor level should have a safe and convenient access and must not inhibit the functioning of the ground floor use.

- 4.112. The function of District and Local Centres should be protected and enhanced. The Centres play an important role in the sustainability of the Borough, providing locations which people can reach by walking, cycling or public transport.
- 4.113. With an increase in people working at home following Covid-19, access to local facilities found in the District and Local Centres, and the Neighbourhood parades has become even more important to provide day to day facilities for local residents.
- 4.114. As set out previously in relation to Policy CTC2, the creation of Use Class E which now contains a range of town centre uses means that there are likely to be a more limited number of change of use proposals which need planning permission and which can be considered by the Council. Through the Use Classes Order amendments the Government has also recognised the role of small retail units selling essential goods through the creation of Use Class F2(a).



- 4.115. Policy ER8 is supported by the Retail Site Survey Background Paper 2022, which assesses the uses and vacancy rates in designated centres in the Borough and takes into account the revisions made to the Use Classes Order in 2020. The Paper demonstrates that at the time of the survey Surrey Heath's District and Local Centres were generally performing well, with the highest frequency of uses in 'shop' use (Class E(a)) and low vacancy rates. The findings of the Background Paper have also been used to inform the proposed District and Local Centre boundaries and Primary Shopping Area designations.
- 4.116. For proposals at ground floor level that are not for an E(a) (retail) use, the proposal should be for an alternative main town centre use, and applicants should provide evidence with their application to show that the development would contribute to the vitality and viability of the centre and would maintain an active frontage. This is in order to maintain a healthy balance of retail and other uses within centres, also recognising that there should be flexibility in order to take account of market conditions and to maintain healthy centres.
- 4.117. The loss of Class E(a) or main town centre uses at ground floor level to other uses can be harmful to the vitality and viability of District and Local Centres. However, it is recognised that where units have been vacant for a sustained period of time, it would be better for the overall health of the Centre to bring them back into use. Evidence of active and appropriate marketing for a period of no less than 12 months must be submitted for such proposals which demonstrates that the premises are not reasonably capable of being used or redeveloped for an E (a) class or main town centre use. As a minimum, the evidence should include: the length of time on the market, type of lease offered and sale price or rent levels advertised.
- 4.118. Proposals for main town centre uses in close proximity of the defined District and Local Centres will be tested against the criteria in Policy ER7 (Edge of Centre and out of Centre Proposals).
- 4.119. All proposals within designated Centres must have regard to the requirements set out in Policy DHI - Design Principles, in relation to the character and amenity of the surrounding area. This includes consideration of the cumulative effect of the development proposal with existing uses.



Policy ER9: Neighbourhood Parades

- 4.120. The Borough's Neighbourhood Parades consist of a row or collection of units including retail uses and in some cases a limited range of other community facilities. The offering of retail uses and services at Neighbourhood Parades is generally more limited than the range found at the Borough's District and Local Centres. In accordance with national planning policy, Neighbourhood Parades do not incorporate a Primary Shopping Area. However, they are valuable in providing for the everyday needs of the communities they serve, and should therefore be protected and enhanced.
- 4.121. A number of the Borough's Neighbourhood Parades act as the centre for smaller settlements in Surrey Heath. The remainder of the Neighbourhood Parades are located within communities that form part of wider settlement areas in the Borough, providing a small retail and service hub for surrounding residents. Careful consideration must therefore be given to any related development proposal that may affect the provision of uses and facilities at Neighbourhood Parades.

Policy ER9: Neighbourhood Parades

- 1) The boundaries of the following designated Neighbourhood Parades are shown on the Policies Map:
 - a) Beaumaris Parade, Frimley Green
 - b) Bisley (Guildford Road)
 - c) Chertsey Road Parade, Chobham
 - d) Deepcut
 - e) Farm Road Parade, Frimley
 - f) Frimley Road and London Road Parades, Camberley
 - g) Heather Ridge Arcade, Heatherside
 - h) Mytchett (Mytchett Road)
 - i) Dean Parade, Old Dean (also subject to requirements of Policy ER10)
 - j) The Parade, Gosden Road, West End.
- 2) Within Neighbourhood Parades, development proposals will be permitted provided they satisfy all of the following criteria:
 - a) They are appropriate to the Neighbourhood Parade in scale and function;
 - b) They maintain or enhance the Neighbourhood Parade's vitality and viability;
 - c) They would not undermine the retail and service function of the Neighbourhood Parade;



Policy ER9: Neighbourhood Parades

- d) They would not result in loss of amenity in terms of noise, fumes, vibrations, odour, or disturbance;
 - e) They would provide an active frontage, if at ground floor level, such as a shop front or window display, which is in keeping with the character of the Neighbourhood Parade;
 - f) They would contribute to the provision of a range of retail, service and community uses, if at ground floor level, which provide for the day-to-day needs of local people.
- 3) Residential development and B2 and B8 uses at ground floor level will not be permitted in Neighbourhood Parades.
 - 4) Residential development at first floor level or above will be supported within Neighbourhood Parades. Uses above ground floor level should have a safe and convenient access and must not inhibit the functioning of the ground floor use.

- 4.122. Neighbourhood Parades are particularly valuable in providing for the everyday needs of their surrounding communities. They form a network of community hubs that play an important role in the sustainability of the Borough, providing shops and facilities people can reach by cycle or on foot, rather than by car. Some of the Borough's Neighbourhood Parades are also accessible by public transport via the bus network.
- 4.123. Policy ER9 is supported by the Retail Site Survey Background Paper 2022, which assessed the mix of uses and vacancy rates in the designated Centres and Neighbourhood Parades in the Borough. The Retail Site Survey Background Paper demonstrated that Surrey Heath's Neighbourhood Parades were generally performing well, with low vacancy rates overall.
- 4.124. Greater flexibility is afforded for ground floor development proposals in Neighbourhood Parades, to reflect the importance of providing a mix of uses to support day to day needs, including retail, service and community uses.
- 4.125. All proposals within Neighbourhood Parades must have regard to the requirements set out in Policy DHI – Design Principles, in relation to the character and amenity of the surrounding area. This includes consideration of the cumulative effect of the proposed use with existing uses.



Policy ERI0: Old Dean

- 4.126. The area around and including the Old Dean local shopping parade would benefit from regeneration and improvement to upgrade existing facilities and to support wider social and economic initiatives in the area. However, the potential for redevelopment is restricted due to its location lying within 400m of the Thames Basin Heaths Special Protection Area, which makes the principle and viability of development more challenging.

Policy ERI0 Old Dean

- 1) A partnership approach will be taken towards continued neighbourhood improvement in Old Dean.
- 2) Development proposals will be supported which:
 - a) are consistent with Policy EI Thames Basin Heaths SPA;
 - b) support the vitality and viability of the local centre;
 - c) provide for a regenerated local centre;
 - d) provide improvements to housing choice and quality;
 - e) increase accessibility and opportunities for walking and cycling;
 - f) provide enhanced community, healthcare and education facilities including through partnership working with providers and the delivery of appropriate infrastructure from new development;
 - g) deliver environmental improvements to improve public realm and provides opportunities for greening the environment;
 - h) contribute to community safety.

- 4.127. Old Dean Ward lies north east of Camberley town centre. The 2019 Indices of Multiple Deprivation shows that within Old Dean there are areas that have greater than average levels of deprivation when compared across Surrey Heath as a whole or in England.
- 4.128. The Council, in partnership with other organisations has established a Poverty Working Group and developed an Action Plan to address inequalities in areas of the Borough with greatest deprivation setting out clear improvement measures. A number of improvements, including a new play area, have already been provided within Old Dean.
- 4.129. The Old Dean local centre was built in the 1960s and could do with significant refurbishment or redevelopment. Areas of local housing association garaging are no longer fit for purpose and there would be benefit in being able to provide improvements to housing mix and quality. Changes of use within the local centre that support the vitality and viability of the centre will be considered in relation to Policy ER8.



- 4.130. However, the local shopping centre and part of Old Dean Ward lies within the Thames Basin Heaths SPA 400m buffer zone. In line with Policy EI no additional dwellings are permitted within the 400m 'exclusion zone' which makes the viability of redevelopment in this area more challenging.
- 4.131. Within the restrictions imposed by the TBHSPA the Council will support proposals for the physical improvement to the local centre and surrounding area including changes of use in the centre in line with Policy ER8: District and Local Centres, and support improvements to the quality and mix of housing stock. This will sit alongside other partnership improvements to provide improved opportunities and outcomes in this area.



Section 5: Infrastructure

- 5.1. New development in the Borough will have an impact on local roads, school capacity, health facilities, open spaces, utilities and many other forms of infrastructure. These are all crucial to the wellbeing of local residents and to the local economy. To mitigate the impacts of new development and create sustainable developments and communities, new and improved infrastructure may be required.
- 5.2. There are three main elements of infrastructure namely, physical, social and green infrastructure:
1. **Physical infrastructure** includes transport, waste and recycling facilities, water supply and wastewater, electricity, gas and communications networks.
 2. **Social infrastructure** includes education and community facilities, affordable housing, healthcare, emergency services and libraries.
 3. **Green infrastructure** includes parks, playing fields and other open spaces, woodlands, allotments, hedgerows and blue infrastructure such as lakes and rivers.
- 5.3. Specific policies elsewhere in this Plan deal with some of these forms of infrastructure in more detail. Areas safeguarded for waste infrastructure are identified in the Surrey Waste Local Plan (2019 – 2033).

Policy IN1: Infrastructure Delivery

Policy IN1: Infrastructure Delivery

- 1) Development will be permitted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet the requirements arising from new development.
- 2) Where additional infrastructure capacity is required this will be secured either through direct provision or financial contributions (Community Infrastructure Levy (CIL), or its replacement, and/or S106).
- 3) Development will be permitted provided that:
 - a) reasonable on-site provision, off-site contribution and/or financial contributions to ensure sufficient capacity is provided towards infrastructure to mitigate the impacts of development including, but not limited to:
 - i. site specific infrastructure requirements including those set out in Site Allocations policies in this Plan;
 - ii. community infrastructure including, but not limited to education,



Policy IN1: Infrastructure Delivery

- healthcare, libraries, community facilities;
 - iii. access to the development, pedestrian, cycling and highway safety improvements necessary to mitigate any impacts on the wider highway network;
 - iv. flood risk measures;
 - v. the delivery and ongoing maintenance of formal and informal open space;
 - vi. the delivery of agreed mitigation measures with regards to the Thames Basin Heaths Special Protection Area;
 - vii. 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.
- b) Infrastructure phasing is agreed and secured in partnership with relevant providers and ensures that infrastructure is operational prior to, or alongside the development it will serve; and
 - c) Infrastructure is designed and located to be accessible to all; and
 - d) It can be demonstrated that all opportunities for dual use have been explored and maximised; and
 - e) Engagement with utilities and service providers including Surrey County Council have taken place, as appropriate to the development; and
 - f) There is no loss or reduction in capacity of existing infrastructure unless:
 - i. the loss of a Community Facility is compliant with Policy IN3; or
 - ii. for other infrastructure, replacement services or facilities are provided on-site or within the vicinity, which meet the needs of the local population; or
 - iii. necessary services can be delivered from other facilities without leading to, or increasing any shortfall in local provision; or
 - iv. it has been clearly demonstrated that there is no need for the facility.
- 4) Viability will only be considered a constraint in exceptional circumstances.
 - 5) A financial contribution will be sought towards the Council's administrative costs of monitoring the implementation of planning obligations.



- 5.4. National planning policy and guidance sets out that planning policies should be informed by evidence of infrastructure needs and make sufficient provision for infrastructure and set out the contributions expected from development.
- 5.5. The Surrey Heath Infrastructure Delivery Plan (2024) sets out the social, environmental and economic infrastructure that will be required to support the development and growth set out in the Local Plan. The Infrastructure Delivery Plan is a 'living document' which will be updated over time.
- 5.6. Where existing infrastructure is considered insufficient to accommodate new development, the Council will require mechanisms to show that sufficient infrastructure capacity can be provided. This might be through direct on-site delivery, improvements to off-site facilities or a financial contribution towards improvements. Where on-site provision or financial contributions are made, arrangements for the on-going maintenance of facilities will be required.
- 5.7. There are a number of mechanisms by which the Council can seek the provision or funding of infrastructure alongside new development. Provision will be secured through planning obligations (S106) and/or the Community Infrastructure Levy (or its replacement) as appropriate. Such contributions may be pooled, in order to allow necessary infrastructure to be secured in a fair and equitable way insofar as is compliant with relevant legislation. Where planning obligations are sought these will be consistent with the following legal tests:
 1. Necessary to make the development acceptable in planning terms;
 2. Directly related to the development;
 3. Fairly and reasonably related in scale and kind to the development.
- 5.8. The Council adopted a CIL Charging Schedule and an Infrastructure Delivery SPD in 2014. These set out how infrastructure delivery from CIL contributions and from S106 planning obligations will be used together to secure the delivery of infrastructure. At the time of preparing this Plan the Government has set out the intention to introduce a new Infrastructure Levy to replace CIL and limit the use of S106. The Council will review the need to update CIL in the light of the new Local Plan and emerging Regulations and transitional arrangements for the new Levy.
- 5.9. The Council is required to produce an Infrastructure Funding Statement that sets out what CIL and S106 monies have been received and how they have been spent. It also looks forward for two years and sets out anticipated income and how this will be spent.



Infrastructure Contributions

- 5.10. Applicants should engage with relevant service providers at an early stage in the planning process. Where new development creates a need for additional infrastructure a programme of phasing and delivery must be agreed with relevant partners before development begins. Where the need for phasing of infrastructure is identified, this will be secured by planning condition or where appropriate, S106 agreements or other mechanisms to ensure that development does not proceed in advance of appropriate and necessary infrastructure.
- 5.11. Policy IN1 sets out an indication of the types of infrastructure where contributions or provision may be expected from development. The infrastructure required in relation to site specific allocations is set out in policies HA1 – HA4 of this Plan. Contributions may be sought towards various stages of infrastructure delivery including:
1. Initial costs e.g. design and development work; and/or
 2. Capital costs; and/or
 3. Ongoing revenue such as the management and maintenance of services and facilities.
- 5.12. Developers are encouraged to work with relevant providers to ensure that there is adequate water supply, surface and foul water drainage and sewerage treatment capacity to serve the new development and that there will be no adverse effects on existing users. This should include early engagement with Thames Water to discuss the intended delivery programme to assist with identifying any potential wastewater network reinforcement requirements.
- 5.13. In April 2019 the Department for Education [published guidance](#) “Securing developer contributions for education”. This guidance reinforces the need for developer contributions to include education of all phases (age 0 – 19) and Special Educational Needs. The Borough Council will work closely with Surrey County Council to ensure that additional education provision is delivered in line with this guidance.
- 5.14. The contributions expected from development to fund infrastructure are currently set out in the CIL Charging Schedule and SPD. Over the life of the Plan the costs of delivering infrastructure are likely to change and therefore specific costs whether through CIL (or its replacement), or planning obligations will continue to be set out on the Council’s website and/or in Supplementary Planning Guidance.

Viability

- 5.15. A [Local Plan Viability Assessment](#) has been prepared to support the Local Plan. In line with national guidance, planning applications that comply with adopted Local Plan policies will be assumed to be viable.



- 5.16. The Council will therefore only consider the viability of development proposals at the planning applications stage in exceptional circumstances, for example where:
1. required planning obligations are in addition to those considered as part of the Local Plan's viability appraisal; or
 2. where there are exceptional site specific viability issues not considered as part of the Local Plan's Viability Assessment.
- 5.17. It will therefore be for the applicant to demonstrate that there has been a change in circumstances since the [Local Plan Viability Assessment](#). In these cases, applicants should provide viability evidence through an 'open book' approach to allow for the proper review of evidence submitted and for reasons of transparency. The terms of the site specific viability appraisal should be agreed by the Council. In such cases the Council will commission an independent review of the viability appraisal, for which the applicant will bear the cost. The Council will then be able to balance the benefits of the proposals against any harm arising from not securing the full planning obligation requirements. Site specific viability appraisals must be presented clearly including stating what assumptions have been made. The appraisals should be in line with national guidance.
- 5.18. Where the Council approves a development where it has been demonstrated that it is not viable to provide the full planning obligation requirements, the Council may include a review mechanism within the S106 to ensure that additional contributions are secured should viability improve over time.

Policy IN2: Transportation

- 5.19. New development presents the opportunity to design positively for sustainable modes of transport and the Council will seek to ensure that wherever possible, opportunities for sustainable means of travel are provided, including through improved walking and cycling routes. Additionally, new development can create additional pressure on the existing highway network and the need for improved transport infrastructure.
- 5.20. The Council will work closely with Surrey County Council as the Local Highway Authority, and as necessary National Highways as owner of the Strategic Road Network in the consideration of impacts on the highway network, on the evidence required to support development proposals, on delivering vehicle and cycle parking provision, and in determining opportunities for more sustainable travel. A Strategic Highway Assessment has been undertaken to assess the impacts of the Spatial Strategy on the highway network which demonstrates that there is unlikely to be any significant impacts on the road network arising from the Spatial Strategy.



Policy IN2: Transportation

- 1) New development will be supported which:
 - a) is located where travel can be minimised and the use of sustainable transport modes is maximised;
 - b) seeks to improve transport capacity and opportunities for travel by rail or bus transport;
 - c) provides safe, convenient access both within the development and to adjoining areas 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 services;
 - d) provides appropriate vehicular in accordance with the Council's standards unless the provision of a car club, low car or car free development is agreed;
 - e) provides appropriate cycle parking in accordance with the Council's standards;
 - f) as appropriate to the scale, nature and location of the development, supports delivery of improvements identified in the Surrey Heath Local Cycling and Walking Infrastructure Plan;
 - g) incorporates the flexibility for embracing technological advances in transport, such as intelligent / rapid vehicle charging, wayfinding for parking spaces, car sharing schemes, and car park management.
- 2) New development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable, including the mitigation of otherwise unacceptable impacts on highway safety and/or any severe residual cumulative impacts on the road network. This mitigation will:
 - a) maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities; and
 - b) address otherwise adverse material impacts on communities and the environment including impacts on amenity and health, noise pollution and air pollution.
- 3) New development that generates significant amounts of movement will:
 - a) provide sufficient information such that the transport impact can be assessed through a Transport Statement or Transport Assessment in accordance with the thresholds set out in the Local Planning Authority's Local Validation List, and advice from Surrey County Council;
 - b) require a Travel Plan which will be proportionate to the size of the new development.



- 5.21. National Planning Policy sets out that policies should make sufficient provision for infrastructure including transport. Policies should ensure that the potential impacts of development on transport networks are addressed, realise the opportunities from existing or proposed transport infrastructure and provide for high quality walking and cycling networks. Policies should promote sustainable travel, providing people with a real choice about how they travel, with local authorities working collaboratively and with transport providers on the infrastructure required to support sustainable development.

The Surrey Local Transport Plan (STP)

- 5.22. Surrey County Council has produced an updated Local Transport Plan called LTP4 which includes plans to reduce the 46% of carbon emissions currently generated in Surrey by transport as part of the overall target for Surrey to reach net zero carbon by 2050. The LTP proposals include: increasing safer and improved walking and cycling routes to encourage people out of their cars; providing more charging points and parking for electric vehicles; more bus services; charging for transport use and expanding car clubs; as well as improving internet connections and redesigning neighbourhoods that enable easier access to local services, reducing the need to travel by car. The LTP4 sets out an ambitious roadmap for a transport network in Surrey that meets the needs of the future.

Surrey Heath Local Transport Strategy

- 5.23. Surrey County Council is the lead authority on delivering and maintaining transport infrastructure in Surrey Heath. This infrastructure includes roads, public transport, cycle ways and footpaths. The County Council produced a Local Transport Strategy for Surrey Heath (2015), as part of the wider Surrey Transport Plan. The Council is working with Surrey County Council on the delivery of a Surrey Heath Local Cycling and Walking Infrastructure Plan.
- 5.24. The Surrey Heath Infrastructure Needs Assessment 2017, identifies some of the current issues with regards to transport infrastructure. For the highway network, this identifies areas of congestion and for rail, it identifies that due to the lack of direct services to London Waterloo, patronage is low.
- 5.25. Bus services are concentrated in the West of the Borough around Camberley and Frimley with limited services provided in the East of the Borough. The public rights of way network between settlements is largely used for leisure uses and the Needs Assessment identifies that in the urban areas, improvements could be made to better connect cycle routes and increase dedicated provision. Improving cycle routes is also an issue in rural areas.



- 5.26. In 2017 works to upgrade the M3 between junction 4a for Farnborough and Junction 2 for the M25 were completed adding an extra lane in both directions. A range of improvement measures within and around Camberley town centre including to the Meadows Gyratory have improved congestion and bus and cycle access to Camberley and public realm improvements carried out in Camberley town centre have improved the environment for users. The [Surrey Heath Forward Programme \(2018\)](#) identifies a programme of transport infrastructure improvements. This has informed the Surrey Heath Infrastructure Delivery Plan (IDP), which as a 'live' document will be updated as necessary.
- 5.27. The Council's adopted Infrastructure Delivery SPD (2014) sets out the approach to funding and securing infrastructure. The Council and Surrey County Council have been successful in securing matched funding for major schemes from Enterprise M3 Local Enterprise Partnership. Successful examples of the Council enabling infrastructure improvement funding through joint working include: The Meadows Gyratory improvements, the A30 Camberley Town Centre Highway Improvements and Camberley High Street Public Realm Improvements.

Developer Requirements

- 5.28. The Council will continue to work with partners including Surrey County Council (the Highways Authority), National Highways and rail and bus operators to bring about transport infrastructure improvements. However, it is the role of developers to ensure that they appropriately mitigate the impacts of their development proposal on transport infrastructure including the highway network and the delivery of sustainable forms of travel. New developments must integrate into existing movement networks and provide safe and suitable access to the road network. Within a site, the layout must be designed such that it gives priority to active and sustainable modes of travel and minimises conflicts between vehicular traffic and cyclists, pedestrians and other users such as horse riders.
- 5.29. Development proposals will need to demonstrate that they will not have a severe residual impact on the operation of, safety of, or accessibility to the local or strategic road networks. This should be achieved by demonstrating how they will mitigate the impacts from the development itself and/or its cumulative effects. Measures designed to encourage people to make sustainable travel choices can assist with reducing these impacts. Surrey County Council has produced guidance relating to the thresholds for transport assessments and travel plans as well as additional information as to how these should be produced.



- 5.30. New developments should demonstrate how they provide the opportunity to maximise the use of the sustainable transport modes of walking, cycling and the use of public and community transport, and opportunities for people with disabilities to access all modes of transport. Development proposals should have regard to the Surrey Street Design Guide: Healthy Streets for Surrey.
- 5.31. The introduction of Building Regulations Part S in June 2022 sets requirements for electric vehicle charging. The provision and design of vehicle and cycle parking, and the provision of electric vehicle charging points will be expected in line with the Councils latest adopted standards and should consider opportunities to future proof development by the provision of below ground infrastructure for electric vehicle charge points. Consideration should also be given to the provision of charge points for electric bikes.
- 5.32. The Council wants to embrace new technology relating to transport across Surrey Heath starting with our urban centres. Provision for electric vehicle charging, intelligent parking systems, car clubs and wayfinding will enable the Council to prepare for the changing future of transport and increasing expectations from our residents and businesses. The provision of Car Clubs will be supported as a means of allowing individuals access to a car without the need for individual ownership. Surrey County Council has produced guidance on when car clubs are most likely to be appropriate and the details of the obligations that will be required from developers in [implementing a car club](#). Car clubs will be considered on a case by case basis in partnership with Surrey County Council.

Policy IN3: Digital and Telecommunications Infrastructure

- 5.33. High quality digital infrastructure has the ability to support improved economic activity and quality of life. Within Surrey Heath, broadband connectivity is relatively good compared to the national and Surrey averages. The [Surrey Heath Economic Development Strategy](#) identifies that Surrey Heath is on course to receive high capacity full fibre connections enabling internet speeds of up to 1000 megabits per second, with over 76% of the Borough already covered.
- 5.34. Throughout the plan period, the demand for quality digital connections in homes and businesses will continue to grow, particularly as a result of the recent trend toward increased home-working. It is therefore important that new developments must be provided with appropriate, up-to-date digital infrastructure that will meet existing and future communication needs.
- 5.35. In line with national policy, the Council will also work with developers to make sure that appropriate wireless digital infrastructure is delivered to support connectivity within the Borough, including 4G and 5G networks (or future technologies as they become available).



Policy IN3: Digital Infrastructure and Telecommunications

Proposals for Residential/Commercial Development

- 1) Development proposals which deliver improvements to digital infrastructure will be supported. Applicants will be required to demonstrate that they have considered gigabit-capable broadband and mobile connectivity within their proposals for new residential, employment and retail developments and as a minimum meet the government's relevant building regulations, or any subsequent national standard relating to the provision of digital infrastructure.

Telecommunications Infrastructure

- 2) Proposals for telecommunications infrastructure development are required to submit a 'Code of Practice Statement', as part of the planning application, which sets out in detail how the proposal has been developed in accordance with the Government's '[Code of practice for wireless network development in England](#)' (March 2022). In particular, how the siting, design, and pre-application consultation, have been developed in accordance with the relevant principles in the guidance.
- 3) Proposals for new telecommunications infrastructure development are required to demonstrate that:
 - a) the proposed development would not cause significant and irremediable interference with other electrical equipment of significance, air traffic services, or instrumentation that is operated in the national interest;
 - b) there is no reasonable possibility of sharing existing facilities in the locality (either in terms of antennae, buildings, or sites), or erecting aerials on an existing building, site, or mast, or other structure; and
 - c) where a new mast or base-station is proposed, it would not exceed exposure guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) when operational, or
 - d) where an addition to an existing mast or base-station is proposed, that the cumulative exposure, when operational, will not exceed guidelines set by the International Commission on Non-Ionizing Radiation Protection ICNIRP.



National Context

- 5.36. The Government is committed to providing world class digital connectivity and has committed to providing 15 million premises with full fibre by 2025 and nationwide gigabit capable networks (expected connection to be capable of achieving 1,000 Mbps download speeds) by [2033](#). To support improvements to digital connectivity, new Building Regulations came into force in December 2022 requiring the installation of gigabit-ready physical infrastructure alongside new homes.
- 5.37. The NPPF (2023) advises that advanced, high-quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full-fibre broadband connections.

Surrey Heath

- 5.38. Surrey Heath's Economic Development Strategy identifies one of its objectives as 'To accelerate gigabit connectivity across the Borough' and a supporting ambition is for 'The vast majority of homes and premises in towns and villages throughout the Borough benefitting from gigabit capability fibre connections to homes and business premises, with hard to reach areas supported with alternative solutions for gigabit capability where fibre connections are not viable'.
- 5.39. The Council will work with the applicant through the planning process, and with the telecommunication industry and other stakeholders in delivering the ambitions set out in the Economic Development Strategy to maximise high speed digital connections across the Borough. Developers should engage with broadband providers at the earliest opportunity to enable the highest possible digital connection to be provided in new developments.

New Telecommunications Equipment

- 5.40. Where there is a need for new telecommunications equipment, such as masts and/or base stations, and planning permission is required, applicants will be expected to demonstrate that these are necessary, subject to consultation where appropriate, and are sympathetically designed and located in line with national policy.
- 5.41. This includes the need to evidence that the proposal does not cause interference with other electrical equipment of significance, air traffic services, or instrumentation that is operated in the national interest. Such evidence could include relevant pre-application engagement by applicants.



- 5.42. To minimise the impact of new equipment, all opportunities should be taken to share existing facilities and applicants will be expected to demonstrate this has been explored. In line with national policy, evidence of consultation with local organisations will be required including where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome or technical site.
- 5.43. Where a new mast or base-station, or an extension to an existing mast or base-station, is proposed, the applicant is required to demonstrate that the relevant exposure levels, when operational, will not exceed guidelines set by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Where required, evidence should be submitted to the Council as part of the planning application and should comprise a statement that self-certifies that the relevant exposure levels will not be exceeded.

Policy IN4: Community Facilities

- 5.44. Community facilities and services have an important role in developing and maintaining community inclusion and cohesion in the Borough. They help make places more sustainable by meeting the community's day to day needs and providing opportunities for social interaction.

Policy IN4: Community Facilities

- 1) Development proposals for the provision of new or improved community facilities will be supported. Proposals should demonstrate that they have maximised opportunities for the new facility to be multifunctional.
- 2) Development proposals resulting in the loss of existing community facilities will not be permitted unless:
 - a) evidenced adequate alternative provision already exists in the locality, or the loss would be replaced by an equivalent or better facility in a suitable and accessible location; or
 - b) a robust assessment has been carried out that demonstrates that:
 - i. there is no need for the facility or demand for another community use on site; and
 - ii. it would no longer be economically viable, feasible or practicable to retain the building or site for its existing use; and
 - iii. all reasonable efforts have been made to retain the facility, including evidence to confirm that the property or site has been actively and positively marketed for a meaningful period with reasonable commercial terms and that there is no realistic interest in its retention as a community use.



Policy IN4: Community Facilities

3) If a community facility is listed as an Asset of Community Value this will be a material planning consideration.

- 5.45. National Planning Policy sets out that to support sustainable communities, planning policies should promote social interaction and enable and support healthy lifestyles. This will include the provision of community facilities, and the protection of valued facilities and services particularly where this would reduce the community's ability to meet its day to day needs.
- 5.46. Community facilities across the Borough comprise a range of social, recreational and cultural facilities and services, including facilities such as community centres and village halls, public houses, libraries, education facilities, healthcare facilities, places of worship, and cultural facilities including theatres and arts centres.
- 5.47. The Surrey Heath [Infrastructure Delivery Plan](#) 2023 identifies infrastructure needed to support development delivered through the Local Plan and includes engagement with relevant health and education providers.
- 5.48. The loss of retail uses within defined town, district, local and neighbourhood areas is dealt with under other Policies in this Plan. This policy deals with those retail facilities outside of those defined areas.
- 5.49. To ensure an adequate provision of community facilities, applications involving the loss of community facilities will be expected to be supported by evidence that the facility is no longer needed or viable. This evidence will depend on whether the facility is a commercial entity such as a shop or public house, or non-commercial such as a school facility.
- 5.50. All proposals resulting in the loss of a community facility should be supported by evidence of consulting with an appropriate range of community groups and service providers to demonstrate that there is no demand for the facility for the current or an alternative community use and justification as to why there is no reasonable prospect of it continuing in a community use.
- 5.51. For commercial community uses, including for the loss of public houses or retail premises outside defined retail areas outlined above, proposals must be supported by evidence that robust and realistic marketing has taken place, which should be demonstrated by:



- a) Confirmation by a commercial property agent that the premises were marketed for the current use at a reasonable price in relation to the use, condition, quality and location of floorspace and for a minimum of 12 months prior to the submission of the application;
- b) Evidence of visible marketing and of enquiries received and how they were followed up;
- c) Reasons why any enquiries were unsuccessful; and,
- d) A copy of all advertisements.

5.52. In determining applications, the Council will view facilities listed as [Assets of Community Value](#) as evidence of local importance and will treat this as a material consideration in determining applications.

5.53. New facilities should be well located for the community that it will serve. Wherever possible facilities should be multifunctional to maximise their benefit to the community. New community facilities may need to be phased alongside new development in accordance with Policy IN1: Infrastructure.

Policy IN5: Green Infrastructure

5.54. Green Infrastructure (GI) is a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. Good quality Green Infrastructure has an important role to play in our urban and rural environments for improving health and wellbeing, air quality, nature recovery and resilience to and mitigation of climate change, along with addressing issues of social inequality and environmental decline.

Policy IN5: Green Infrastructure

- 1) The Council, in partnership with other organisations, will plan for a network of accessible and integrated green infrastructure, including Suitable Alternative Natural Greenspace, across the Borough and linked to neighbouring areas. The Council will seek to strengthen the role of the green infrastructure network.
- 2) Development proposals are required to demonstrate that they will:
 - a) reinforce, link, buffer and create new green infrastructure; and
 - b) promote, manage and enhance public enjoyment of green infrastructure.
- 3) Development proposals will not be permitted where they will result in the loss or fragmentation of existing green infrastructure assets/components or compromise



Policy IN5: Green Infrastructure

the integrity of the green infrastructure network, taking into account the Local Nature Recovery Strategy, unless replacement provision or suitable alternative provision that is equivalent or better value in terms of quantity, quality and accessibility can be made.

- 4) Any adverse impacts on the green infrastructure network should in the first instance be fully mitigated through the provision or improvement of green infrastructure on-site or where this is not possible, through appropriate off-site compensatory measures.
- 5) Where new green infrastructure is provided, suitable arrangements must be put in place for its future management and maintenance.

National Context

- 5.55. The Council recognises the multiple benefits to residents and others in having a strong green infrastructure network. National Planning Policy and Guidance identifies that Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure setting out appropriate policies for their protection and enhancement.
- 5.56. Natural England launched the Green Infrastructure Framework in January 2023. The framework provides a number of tools and guides for planners, developers, communities, and greenspace managers investing in space for nature in urban areas and creating climate resilient places to live. The framework comprises five components:
1. Green Infrastructure Principles: the what and how of good green infrastructure.
 2. Green Infrastructure Standards: guidance on national standards for green infrastructure quantity and quality.
 3. Green Infrastructure Maps: mapped environmental, socio-economic datasets to support the standards.
 4. Green Infrastructure Planning and Design Guide: practical, evidence-based advice on how to design good quality green infrastructure.
 5. Green Infrastructure Process Journeys: guides on how to apply the Green Infrastructure Framework.



Surrey Heath

- 5.57. Surrey Heath is fortunate to have a rich and varied landscape which includes a variety of green and blue infrastructure. This includes heathland, greenspaces within the Borough's urban and rural settlements, waterways, and Suitable Alternative Natural Green Space (SANG), which is greenspace put into place to mitigate the impact of residential development on the Thames Basin Heaths Special Protection Area (SPA). Approximately 36% of Surrey Heath is treed, including along the A30 which runs through the Borough. Green infrastructure therefore plays an important part in the character of the Borough.
- 5.58. This Policy links directly to other policies in the Plan relating to specific green infrastructure assets. These include Policy E2 Biodiversity and Geodiversity, which identifies the range of sites in the Borough that have biodiversity importance, Policy IN6 Green Spaces, and Policies SS3a and SS3b Climate Change. In addition to the green infrastructure assets identified elsewhere in the Plan, types of areas that contribute to the green infrastructure network include:
1. Parks and public gardens, including urban parks, country parks and formal gardens;
 2. Natural and semi-natural urban greenspaces, including woodlands, urban forestry, scrub, grasslands, wetlands, open and running water and derelict open land;
 3. Outdoor sports facilities, including tennis courts, bowling greens, sports pitches, golf courses, school and other institutional playing fields, and other outdoor sports areas.
 4. Amenity greenspace, including informal recreation spaces, green spaces in and around housing, domestic gardens and village greens;
 5. Provision for children, including play areas and other more informal areas;
 6. Allotments and community gardens;
 7. Cemeteries and churchyards;
 8. Accessible countryside in urban fringe areas;
 9. Green corridors such as footpaths, bridleways, the Blackwater Valley and Basingstoke Canal, rail embankments and roads with verges or lines of trees such as the A30.
- 5.59. Development must avoid the loss, fragmentation, severance or other significant impacts on the functioning of the green infrastructure network. At an early stage in the planning process, developments should assess how green infrastructure can be incorporated as part of the overall design solution or masterplan, protecting and enhancing any existing green infrastructure assets on site and designing-in new green infrastructure. Consideration should be given to how green infrastructure can be utilised to deliver climate change mitigation and adaptation. Where public new green infrastructure is provided such as allotments or open space, arrangements for long term maintenance should be identified which may include a financial payment secured through a planning obligation.



- 5.60. The provision of green infrastructure on site such as amenity greenspace, tree planting or play areas can more easily be incorporated in larger developments but applicants for smaller schemes are encouraged to consider how green infrastructure can be incorporated into their developments (for example, green roofs, landscaping, gardens, natural services of buildings, SUDs and amenity space).
- 5.61. Any additional pressures on the green infrastructure network arising from new development must be fully mitigated. This will normally be addressed through the on-site provision of green infrastructure, or if this is not feasible, for example on smaller sites, through off-site measures such as off-site biodiversity improvements, tree planting or upgrading of local green infrastructure facilities.

Policy IN6: Green Space

- 5.62. Green open space forms an important part of the Borough’s green infrastructure network and provides multiple community benefits, including contributing to health and wellbeing. Open spaces can include a range of forms including parks and gardens, semi-natural green spaces, children’s play areas, green corridors and allotments, as well as outdoor recreational facilities.
- 5.63. Outdoor recreational facilities, both formal and informal, have an important role in maintaining people’s health and providing opportunities to participate in sport and exercise. Outdoor sports and recreational facilities can include tennis courts, bowling greens, sports pitches, athletics tracks, school and other institutional playing fields, and other outdoor sports areas. Playing fields provide an important element of the overall provision of open space, sports and recreation facilities across the Borough, providing the opportunity for formal and informal active participation in sports.

Policy IN6: Green Space

- 1) Green spaces, as shown on the Policies Map are allocated for their visual amenity and/or recreational value.
- 2) Development will not be supported on areas designated as green spaces, unless:
 - a) For sites designated for their recreational value:
 - i. an evidenced assessment has been undertaken that clearly and robustly demonstrates re-provision can be made elsewhere of equivalent or better community benefit in terms of quality, quantity and accessibility; or
 - ii. the development and provision for sports and recreation clearly outweighs the loss of green space; or



Policy IN6: Green Space

- iii. an assessment has been undertaken, which has clearly shown the open space to be surplus to requirements in meeting need in Surrey Heath over the plan period.
- b) For sites designated for their visual amenity, it can be clearly demonstrated that the loss will not have a negative impact upon residential amenity and local character, and an element of open space will be incorporated into the development proposal.
- 3) Development proposals that include existing areas of ancillary green open space that are not designated, but none the less contribute to an areas character, should be assessed in accordance with Green Infrastructure Policy IN5 of this Plan.
- 4) Development proposals that would result in a net increase in number of residential units are required to provide open space in accordance with the most up to date standards based on the expected occupancy of the new development. Where required onsite open space provision is unable to meet the quantity standards, an equivalent financial contribution based on the amount and type of open space omitted will be sought.

- 5.64. The NPPF outlines that ‘access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities’.
- 5.65. Surrey Heath contains numerous green spaces within its urban areas, smaller settlements and rural villages, as well as outside settlement areas. The green spaces perform a number of functions, including recreational opportunities and visual breaks, as well as contributing to the physical and visual attractiveness and quality of settlement areas, constituting highly valued assets. As such, they contribute to the health and wellbeing of local communities. Green spaces in Surrey Heath also form an important part of the Borough’s green infrastructure network.
- 5.66. The [Green Space Assessment](#) (2024) proposes the designation of green spaces throughout the Borough, both within and outside defined settlement boundaries, amounting to a total of 157 green spaces. The green spaces allocations are informed by the Surrey Heath Green Space Assessment 2024 which details whether a site has been proposed for designation for its visual amenity value and/or recreational value.



- 5.67. The Surrey Heath Open Space Assessment (2016) outlines the quantity of different types of open space provision in the Borough. One of the conclusions of the Study was the need to provide improved provision for young people and older people. New development will be expected to meet the open space standards set out in the [Open Space Strategy](#) (2016), or as subsequently amended. Development proposals for new open space should include natural and semi-natural features and consider opportunities to provide additional play provision and allotments. New open space should also support and enhance support the existing rights of way network, providing new footpaths and cycle links where possible. Where open space or other facilities are provided on site they should be well located and designed with appropriate management arrangements in place.
- I. For Areas of Play, the following standards are expected from the [Open Space Assessment](#) (or as subsequently updated):
 - a) Local area of play (LAP) – minimum of 0.01ha per 1,000 population.
 - b) Local Equipped Area for Play (LEAP) – minimum of 0.04ha per 1,000 population.
 - c) Neighbourhood Equipped Area of Play (NEAP) – minimum of 0.1ha per 1,000 population.
- 5.68. Outdoor playing fields provide an important element of the overall provision of open space, sports and recreational facilities across the Borough, providing the community with formal and informal active participation in sports. The Surrey Heath Playing Pitch Strategy and Action Plan (2023) considers the provision of playing pitches in the Borough. The study identified shortfalls in some areas of provision, including a current shortfall of adult, youth 11v11 and mini 5v5 football pitches and a future shortfall across each pitch type, as well as an overall shortfall of senior rugby pitches and cricket squares based on current and future demand. In addition, the study identifies a need for further 3G pitch provision.
- 5.69. The study supports the need to protect the existing provision of playing pitches across the Borough to meet current and likely future demand. The assessment identified that in meeting future requirements brought about by new development, regard will need to be given to providing more multi-sport sites that are supported by appropriate ancillary facilities. Such facilities should be accessible to all users. Re-use and improvements of existing facilities may also help meet future requirements.
- 5.70. The study provides an 'Action Plan' which will be reviewed at regular intervals with relevant partners. It provides recommendations based on current levels of usage, quality and future demand, as well as the potential of each site for enhancement.



- 5.71. The Council will protect recreational uses through resisting the loss of existing outdoor recreational facilities, unless equivalent or better replacement facilities are proposed. In addition to ensuring the protection of sites, new development will need to ensure that any additional pressure it will place on playing pitches is appropriately mitigated. This will be through on-site provision secured through S106 for larger sites, or through developer contributions via CIL.

Policy IN7: Indoor and Built Sports and Recreational facilities

- 5.72. Indoor sport and recreation facilities include indoor swimming pools, sports halls, health and fitness facilities, indoor bowls, squash courts, martial arts dojos, gymnastics halls and certain football clubs. Built sport and recreation facilities include tennis courts, bowls, multi-use games areas and skate parks.

Policy IN7: Indoor and Built Sports and Recreational facilities

- 1) Indoor and built sports and recreational facilities will be promoted by safeguarding existing facilities and supporting proposals for new and improved, refurbished, replacement or extended indoor and built sport and recreational facilities in sustainable locations.
- 2) The loss of existing indoor and built sport and recreational facilities will be resisted unless replacement facilities of an equivalent or increased quantity and standard are proposed in a location that is accessible to the current catchment, unless it can be demonstrated that:
 - a) the existing use is unviable; and
 - b) there is no longer a need for the existing facilities or an alternative indoor and built sport and recreational use, based upon an up to date and robust assessment.

- 5.73. Indoor and built sport and recreational facilities play an important role in promoting healthy lifestyles and encouraging physical activity. The Council commissioned an Indoor Sports Facilities Assessment and Strategy (2016) which examined indoor sports provision within Surrey Heath, including quantity, quality and accessibility assessments. The study recommended that existing provision in the Borough should be protected and enhanced. In July 2021 the new Places Leisure Camberley opened replacing the former Arena Leisure Centre and providing modern enhanced indoor sports and recreational facilities, with the development addressing a number of issues identified within the 2016 Study.



- 5.74. To demonstrate indoor and built sport and recreational facilities are no longer viable, the Council will require the submission of full financial evidence in the form of a commercial viability study. The evidence should clearly set out how retention of the facilities has been fully explored. This should include realistic, appropriate and genuine marketing of the facilities for its existing use and alternative sport and recreational use for a period of at least 12 months prior to the submission of a planning application. Robust evidence will also be required to demonstrate that there is no longer a need for the existing facilities or an alternative indoor and built sport recreational use.



Section 6: Environment

- 6.1. The Thames Basin Heaths Special Protection Area (SPA) was designated on the 9th March 2005. It is protected from adverse effects under The Conservation of Habitats and Species Regulations 2017 (or as subsequently amended) and European Directive 2009/147/EC. Local Planning authorities are identified as a “competent authority” for the purposes of determining whether or not a proposed development scheme or development plan document is likely to have a significant effect upon the SPA. The effect of the Regulations is to require Local Planning Authorities to ensure that any proposed development scheme or Development Plan will not adversely affect the integrity of the SPA.
- 6.2. The SPA is a network of heathland sites which are designated for their ability to provide a habitat for the three following internationally important rare bird species that nest on the ground or at low level and so are easily disturbed or harmed by human activity: Dartford Warbler, Woodlark and Nightjar. It is spread across nine local authorities in Berkshire, Hampshire and Surrey. Thames Basin Heaths SPA in Surrey Heath comprises of Chobham Common, Brookwood Heaths, Colony Bog to Bagshot Heath and Broadmoor to Bagshot Woods and Heath, overall covering approximately 23% of the Borough. The entirety of Surrey Heath lies within 5 kilometres of the Thames Basin Heaths SPA.

Policy EI: Thames Basin Heaths Special Protection Area

Policy EI: Thames Basin Heaths Special Protection Area

- 1) The Council will only permit development where it is satisfied that this will not give rise to likely significant adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (SPA), which includes Thursley, Ash, Pirbright & Chobham Common Special Area of Conservation (SAC), whether alone or in combination with other development.
- 2) Net new residential development will not be permitted within the ‘exclusion zone’ set at 400m linear distance from the SPA boundary. Non-residential development proposals within 400m of the SPA will need to demonstrate that they will not harm the integrity of the SPA through an Appropriate Assessment.
- 3) All new residential (net) development within 5km of the Thames Basin Heaths Special Protection Area is considered to give rise to the possibility of likely significant effect. Where one or more adverse effects on the integrity of the SPA will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity and be subject to an Appropriate Assessment. These measures are unlikely to be acceptable unless agreed with Natural England.



Policy E1: Thames Basin Heaths Special Protection Area

- 4) Such measures will include:
 - a) all net new residential development will provide or contribute toward the provision of Suitable Alternative Natural Greenspace (SANG).
 - b) SANGs will be provided at a standard of at least 8ha per 1,000 new occupants.
 - c) developments of 10 or more net new dwellings will only be permitted within the identified catchment areas of SANG.
 - d) all net new residential development will contribute toward Strategic Access Management and Monitoring (SAMM) measures.
- 5) Where further evidence robustly demonstrates that the integrity of the SPA can be protected using amended or alternative measures, the Council will agree these in consultation with Natural England.

- 6.3. The South East Plan was published in May 2009. Whilst the majority of the plan was revoked in March 2013, policy NRM6 relating to the Thames Basin Heaths Special Protection Area remains in place and is relevant to development in the Borough. The approach taken in Policy E1 is consistent with policy NRM6 of the [South East Plan](#).
- 6.4. Due to the large number of local authorities involved and the cumulative nature of the impacts (as a result of many individual housing applications) a co-ordinated approach to avoidance measures has been necessary and the Thames Basin Heaths Joint Strategic Partnership Board (JSPB) has been set up to provide the vehicle for joint working between local authorities and other organisations responsible for protection of the Thames Basin Heaths SPA. The JSPB includes Member representation for each affected Local Authority together with a number of stakeholders.
- 6.5. In February 2009 the JSPB endorsed a strategic Delivery Framework. This recommends a combination of three avoidance measures to protect the Thames Basin Heaths from the impacts of new residential development:
 1. The establishment of a 400 metre buffer around the SPA within which no net new residential development will be permitted.
 2. The provision of Suitable Alternative Natural Greenspace (SANG).
 3. Strategic Access Management and Monitoring (SAMM) measures, coordinated visitor management across the whole of the publicly accessible SPA.



- 6.6. The Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document 2019 sets out in detail the approach that Surrey Heath Borough Council will take to avoiding harm to the Special Protection Area as a result of new housing. This includes details of the types of development affected, guidelines for the creation of SANG and guidance on SANG and SAMM contributions.
- 6.7. The Thames Basin Heaths SPA Avoidance Strategy SPD (2019) sets out that for development proposals with a net increase of 10 or more residential units, the site is required to be within the SANG catchment that capacity will be allocated to. For development proposals with an increase of 136 or more, net residential units will generally be expected to provide bespoke SANG solutions. In addition, larger developments in the Western Urban Area (comprising the settlement areas of Camberley, Frimley, Frimley Green and Mytchett), that are unable to realistically provide land for SANGs may also be able to use capacity at strategic SANGs. This approach may also apply to sites outside this area that have particular, site specific circumstances which support the need for off-site SANGs provision, subject to the availability of SANG capacity.
- 6.8. Proposals for other forms of development either where the use is quasi-residential or by virtue of proximity to the SPA, for example in the 400m buffer zone, will be required to contribute toward avoidance measures and will be subject to an Appropriate Assessment.
- 6.9. The Council's Thames Basin Heaths Special Protection Area Topic Paper sets out the Council's approach to the provision of SANG for the Plan period, including an assessment of sites with potential to mitigate future residential development in the Borough.
- 6.10. The Council will support investigations into alternative methods of mitigation. Where further robust evidence demonstrates that the integrity of the SPA can be protected using alternative mitigation measures, or changes to existing strategies, such measures would need to be scientifically sound and agreed with the JSPB and Natural England.
- 6.11. Under Article 6(3) of the Habitats Directive, Competent Authorities have a duty to ensure that all the activities they regulate have no adverse effect on the integrity of any of the Natura 2000 sites. The Competent Authority, in this case Surrey Heath Borough Council, must assess the possible effects of a plan or project on any Natura 2000 sites through a Habitats Regulations Assessment. A European Court of Justice [judgement](#) in April 2018 established the legal principle that a full Appropriate Assessment (AA) must be carried out for all planning applications involving a net gain in residential units in areas affected by the Thames Basin Heaths SPA, and that a Habitats Regulations Screening Assessment cannot take into account any proposed measures to mitigate any likely impact at the screening stage. The Council is therefore required to carry out a full Appropriate Assessment of relevant plans and planning applications.



Policy E2 Biodiversity and Geodiversity

- 6.12. Surrey Heath has a rich and varied landscape and is fortunate to have a range of designated sites important for their biodiversity value and which contribute to the character of the Borough. Other sites, both individually and collectively, that are not designated play an important role in protecting and enhancing the diversity of species within the Borough. If new development is not planned and delivered carefully, it can have detrimental impacts on biodiversity, both directly through the loss or fragmentation of habitats, or indirectly through disturbance and pollution.
- 6.13. The Council is committed to the protection and enhancement of biodiversity and geodiversity. The Council will work proactively with partners to protect, maintain and enhance the Borough's biodiversity and geological resources.

Policy E2: Biodiversity and Geodiversity

- 1) Development proposal will be permitted where they protect and enhance biodiversity and/or geodiversity. Development proposals are required to positively contribute towards the priorities and measures of the Local Nature Recovery Strategy (LNRS), or towards the objectives of the Biodiversity Opportunity Area Policy Statements prior to publication of the LNRS. Sites outside of these strategic priority areas should contribute to improving habitat connectivity in the immediate vicinity of the site.
- 2) Where harm or loss of biodiversity and/or geodiversity cannot be avoided, mitigation will be required such that it can be robustly demonstrate that:
 - a) there will be no adverse effect on the integrity of international, national and local designated sites;
 - b) there will be no adverse impact on protected species or local populations of priority species;
 - c) there will be no loss or deterioration of a priority habitat type, and/or irreplaceable habitat;
 - d) there will be no adverse effect on the integrity of linkages between designated sites and priority habitats.
- 3) The weight attributed to the protection of nature conservation interests will be commensurate to their status and significance, and any other designation applying to the site, habitat or species concerned. For proposals that affect nationally protected sites, exceptional circumstances would be required to robustly demonstrate that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate compensation will be delivered.
- 4) Effective avoidance, mitigation and compensation will be secured through the



Policy E2: Biodiversity and Geodiversity

imposition of planning conditions or planning obligations as appropriate, including monitoring for the effectiveness of these measures.

- 5) Development proposals, where appropriate, will need to take full account of the impact on soils. 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.

National context

- 6.14. The [Environment Act 2021](#) sets out how the UK government plans to protect and improve the natural environment in the UK. The Environment Act recognises the accelerating impact of climate change in the UK and the associated impacts of damage to nature with species loss, habitat erosion and the disappearance of cherished wildlife.
- 6.15. The NPPF requires Local Plans to set out a strategic approach to planning for the creation, protection, enhancement, and management of networks of biodiversity and to plan for biodiversity at a landscape scale across local authority boundaries. Local planning authorities are advised to set criteria-based policies against which proposals for any development, on or affecting protected wildlife or geodiversity sites, will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks. Where the adverse impacts of development on biodiversity are identified, they must be proportionately addressed in accordance with the mitigation hierarchy of avoidance, mitigation and compensation.
- 6.16. Biodiversity enhancements should be integrated into the design of a site through the retention and provision of semi-natural habitats, including to deliver biodiversity net gain, as well as measures such as bird and bat boxes, swift bricks, bee bricks and green roofs and walls on building structures. Site design should also propose biodiversity enhancements which link to or create green corridors.



- 6.17. Where development proposals potentially affect biodiversity, planning applications will be required to include an ecological assessment, prepared by a suitably qualified and experienced ecologist. This should be an assessment of the impact of the proposal on protected and otherwise endangered or vulnerable species and habitats, having regard to guidelines for Preliminary Ecological Assessment and Ecological Impact Assessment available online from the [Chartered Institute of Ecology and Environmental Management](#), and the [British Standard for 'Biodiversity: Code of Practice for Planning and Development' BS42020](#).

Surrey Heath

- 6.18. The weight to be attributed to the protection of nature conservation interest will be commensurate to their significance. The Council will apply a hierarchical approach to the conservation of designated sites within the Borough as follows:
1. International Sites: Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites, or candidate/formally proposed versions of these designations.
 2. National Sites: Sites of Special Scientific Interest (SSSI) and National Nature Reserves.
 3. Irreplaceable Habitats: habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity, such as ancient woodland, ancient and veteran trees. Further advice on irreplaceable habitats in Surrey is available online from the [Surrey Nature Partnership](#).
 4. Local Sites: Sites of Nature Conservation Importance (SNCI), Local Nature Reserves, Local Geological Sites and Regionally Important Geological Sites (RIGS).
- 6.19. The heathland in Surrey Heath is a defining characteristic of the Borough and the setting of settlements within the Borough. Within and surrounding the Borough are large areas of international ecological importance, including SPAs and SACs. The Thames Basin Heaths Special Protection Area (SPA) and Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) mostly coincide with one another within Surrey Heath.
- 6.20. Within the Borough and neighbouring authorities there are also a number of SSSIs, as well as a National Nature Reserve (NNR), which relate to legislation from The Wildlife & Countryside Act 1981 (as amended). The SSSIs in Surrey Heath are:
1. Broadmoor to Bagshot Woods and Heaths.
 2. Chobham Common (also an NNR).
 3. Colony Bog and Bagshot Heath.
 4. Ash to Brookwood Heaths.
 5. Basingstoke Canal.
 6. Horsell Common



- 6.21. There are a number of locally designated wildlife sites in the Borough, known as Sites of Nature Conservation Interest (SNCI's). These are designated by the Council working with the Surrey Local Sites Partnership. Further information is available online from the [Surrey Nature Partnership](#) (SyNP). These areas are important both in their own right and as part of an ecological network of sites across and beyond the Borough. In addition, some areas of land which may be within SSSIs or SNCIs are also designated as Local Nature Reserves, to encourage public awareness, education and enjoyment of the wildlife features of these sites.
- 6.22. The SyNP is the recognised Local Nature Partnership for Surrey. The SyNP is working with local authorities in Surrey to set out an approach to conserving and enhancing the biodiversity of the county at a landscape scale, which may also be viewed as the investment needed to maintain our environment when presented as 'natural capital'. This approach identifies Biodiversity Opportunity Areas (BOAs); areas spanning concentrations of recognised sites of biodiversity importance where conservation land management activities in between these sites, as well as best practice management within them, will be most effective in improving connectivity and reducing habitat fragmentation. From 2025, it is expected that the Local Nature Recovery Strategy will supersede the policy objectives set for BOAs.
- 6.23. BOAs and urban BOAs extend across local authority boundaries and therefore provide the strategic approach that addresses biodiversity at the landscape scale as required by the NPPF. The area within Surrey Heath that falls within BOAs mainly relates to the Thames Basin Heaths, as well as the Blackwater and Bourne river corridors, as set out in the [Thames Basin Heath BOA Policy Statement](#)s and the [Rivers BOA Policy Statement](#)s, respectively. Where proposals fall within or adjacent to a Biodiversity Opportunity Area, their required measurable biodiversity net gain enhancements (see Policy E3) should support the BOA's objectives, including those set out in the SyNP BOA Policy Statement, Alternative measures may be acceptable where it is clearly demonstrated that these are more appropriate, given the site specific circumstances of the proposal.
- 6.24. The Council supports the emerging Local Nature Recovery Strategy being led by Surrey County Council. The Council will work with Surrey County Council and partners to bring forward opportunities to conserve and enhance the natural assets of Surrey Heath, both green and blue (freshwater) natural assets including the River Blackwater, Basingstoke Canal and the Bourne River and Tributaries.



- 6.25. All aquatic habitats, including watercourses and areas of standing water such as lakes and natural and/or historic ponds, should be treated as priority habitats. Watercourses frequently function as highly important green corridors that link habitats and allow species to disperse, playing a vital role in the health and recovery of our natural environment. Areas of standing water frequently support a diverse range of aquatic and terrestrial species, provide storage for environmental water stocks and contribute to visual amenity and leisure opportunities.

Soils

- 6.26. Soils are a finite, multi-functional resource which underpin the wellbeing and prosperity of communities. To ensure that development proposals do not impact on this valuable resource, development proposals should take full account of their impact on soils, their intrinsic character and the many ecosystem services they deliver. The Council will seek to safeguard the long term capability of the best and most versatile agricultural land, in accordance with national guidance.

Policy E3: Biodiversity Net Gain

- 6.27. Biodiversity net gain can be defined as development that leaves biodiversity in a measurably better state than beforehand. Developers should work with the Council, wildlife groups, landowners and other stakeholders in order to support agreed local priorities for nature conservation. Existing habitats should be protected where possible, and any impacted habitats must be compensated by restoring or creating habitats that are of overall greater value, as defined by the statutory Biodiversity Metric. Biodiversity net gain should be considered from the outset of proposal design, including ecological considerations in relation to site selection and early stage concept design and layout, to avoid impacting high value habitats and integrate habitat connectivity opportunities. Applicants are encouraged to seek pre-application advice including biodiversity net gain.
- 6.28. There are many opportunities to encourage biodiversity that can be provided through the development of sites. Nature recovery is not confined to designated wildlife sites; every development has the potential to contribute towards the conservation and restoration of locally important habitats and species and to increase bio-abundance more widely. In relation to Biodiversity Net Gain, opportunities include retaining, enhancing and creating wildlife-rich habitat areas and corridors and providing features within the built environment such as green roofs, green walls, natural sustainable drainage systems and the provision of suitable native species of trees/other plants, in landscaping.



Policy E3: Biodiversity Net Gain

- 1) Qualifying development proposals will be permitted provided that they can demonstrate the provision of biodiversity net gains of at least 20 per cent, or the advised national minimum target, whichever is greater, measured using the statutory Biodiversity metric. Any off-site habitat creation or enhancement measures must be in line with the hierarchy in this policy, within Surrey Heath Borough, unless demonstrably unfeasible.
- 2) Significant areas of habitat creation and/or enhancement should align with and support delivery of the Local Nature Recovery Strategy for Surrey where applicable, and must be secured and maintained for at least 30 years, or a period of time set out in national policy, whichever is greater.
- 3) Proposals for the creation of biodiversity gain sites will be supported where these are suitably located, designed and appropriately managed in order to align with local and national strategies, in particular the Local Nature Recovery Strategy for Surrey.
- 4) Development and Biodiversity Gain site proposals must provide suitable ecological survey information and assessment to inform Biodiversity Net Gain plans and to ensure that design for biodiversity gains take full account of all relevant ecological considerations.
- 5) Development proposals should seek to deliver environmental net gain, in accordance with national guidance.

- 6.29. The NPPF makes clear that planning policies should contribute to and enhance the natural environment by minimising impacts on, and providing net gains for, biodiversity. The Environment Act requires biodiversity net gains of at least 10%, for qualifying types of development.
- 6.30. A higher target of 20% is both necessary and deliverable in Surrey Heath. Evidence of 'need' is provided in the Surrey Nature Partnership's report '[The State of Surrey's Nature](#)' (2017) which demonstrates that Surrey's rate of biodiversity loss is even more severe than the national average and it is therefore justified to require a higher target to halt and reverse these historic losses. The basis for adopting 20% net gain across Surrey is set out in a paper by the [Surrey Nature Partnership](#). Furthermore, the Council is developing a local habitat bank to provide offsite biodiversity units including on Council-owned land, in support of demonstrating the feasibility of providing offsite gains. The [Local Plan Viability Assessment 2024](#) has demonstrated that 20% BNG requirement will not impact viability of delivery of housing sites.



- 6.31. As such, development proposals in Surrey Heath will be required to deliver a minimum net gain of 20% biodiversity units or the advised national minimum amount, whichever is greater.
- 6.32. The Environment Act and associated secondary regulations exempt some types of development from the national biodiversity net gain requirement. The same exemptions apply for the biodiversity net gain requirement in this policy.
- 6.33. The methodology used to calculate net gain will be the statutory Defra Biodiversity Metric and design and implementation should conform to 'BS 8683: Process for designing and implementing biodiversity net gain' produced by the British Standards Institution.
- 6.34. Biodiversity net gain should be in line with national policy guidance on additionality, including in relation to any habitat creation required to mitigate or compensate for impacts of new development. Biodiversity net gain should not be applied to irreplaceable habitats and should be dealt with in addition to any mitigation and/or compensation requirements for European sites, as Suitable Alternative Natural Greenspace. The baseline biodiversity value of a development site must be assessed in line with national planning policy guidance.
- 6.35. In the first instance, net gain should be delivered on-site. Where this is not wholly achievable, offsite measures are required. In the biodiversity metric, the 'spatial risk multiplier' should be calculated in line with the statutory metric guidance. Off-site provisions should be as close to the development site as practical, in line with the following hierarchy:
 1. Within Surrey Heath Borough;
 2. Beyond the Borough but within Thames Basin Heaths National Character Area (NE530), or within the county of Surrey; and,
 3. National Biodiversity credits or other offsite provision, subject to the satisfaction of the Local Planning Authority.
- 6.36. Successful implementation of biodiversity net gain will help restore and create high-quality habitats that can provide a home for a diverse range of species, build resilience to climate change and support health and wellbeing through integration of green features into development. Further guidance on the Council's requirements for Biodiversity Net Gain is set out in the [Biodiversity Net Gain Guidance](#) and guidance for the strategic priorities which biodiversity net gain measures should support, will be set out in the Local Nature Recovery Strategy for Surrey.



- 6.37. The delivery of enhancements to biodiversity in and around new developments should be informed by an understanding of the local ecological network and should seek to include habitat restoration, re-creation and expansion, improving links between designated sites, buffering of existing designated sites, delivery of new biodiversity features within development, and securing management for long-term enhancement.
- 6.38. The Council is developing plans for habitat enhancement and creation measures, which will provide Biodiversity units across a range of habitat types, in support of developments which require offsite compensation and enhancement.
- 6.39. Environmental net gain is concept that recognises the need to consider the environment as an integrated system, comprising many interconnected elements. For example soil, atmosphere (including Greenhouse Gases emissions and carbon sequestration), water, habitats, animals including associated pollination services, as well as the relationship between people and the environment in terms of the provision of food, materials and access to green space for wellbeing. Environmental net gain also includes consideration of natural capital assets in their specific/spatial context. Applicants should consider opportunities to integrate environmental net gains into development proposals from the outset, for example 'bio-solar roofs' which support onsite biodiversity and onsite renewable energy generation to reduce carbon emissions.

Policy E4: Pollution and Contamination

Policy E4: Pollution and Contamination

Pollution

- 1) Development will be permitted provided that:
 - a) it does not give rise to, or would be subject to, unacceptable levels of pollution; and
 - b) it is satisfactorily demonstrated through an assessment that any adverse impacts of pollution will be adequately mitigated or otherwise minimised to an acceptable level in accordance with recognised national and international standards, guidance and methodologies, or any local authority adopted supplementary guidance
- 2) Where development is proposed on or near a site that may be impacted by, or may give rise to, pollution, such a proposal must be supported by an assessment that investigates the risks associated with the site and the possible impacts from the development to nearby sensitive receptors, the natural and built environment, and impacts to the development and future users. The assessment should propose adequate mitigation or remediation when required to achieve a safe and acceptable



Policy E4: Pollution and Contamination

development. This assessment should be written in line with best practice guidance.

- 3) Development will only be permitted in an Air Quality Management Area (AQMA) where it can be demonstrated that it will not have any adverse impacts to human health or lead to a deterioration of air quality within an AQMA.
- 4) Where required, planning obligations will be used to secure contributions to tackle poor air quality and/or for air quality monitoring.
- 5) Where there will be significant adverse impacts that cannot be effectively mitigated, the planning application will be refused.

Land contamination

- 6) Development proposals on land which is suspected of being affected by historic or current land contamination will be required to investigate the nature and risk of the contamination both on the development proposal and the wider environment. Where contamination is revealed, the applicant will be required to submit and implement a scheme of remediation that is appropriate to the proposed use and which demonstrates the development site no longer meets the statutory definition of contaminated land.

Demolition and Construction

- 7) Major developments and all developments near sensitive receptors are required to provide a Demolition and/or Construction Management Plan.

- 6.40. Unacceptable levels of pollution can have a significant impact on the environment and on the health, well-being and quality of life enjoyed by individuals and communities. Planning policies have an important role in helping to minimise local air pollution by influencing the location of polluting developments. This Policy sets out how development proposals should seek to protect, and where possible improve upon, the amenity of existing and future residents and building occupants, and the environment in general.

Pollution

- 6.41. Pollution refers to anything that affects the quality of land, air, water or soils which might lead to an adverse impact on human health, quality of life, the natural environment or general amenity. It includes noise, vibration, light, air quality, radiation, dust, fumes or gases, odours or other effluvia, harmful substances, or degradation of soil and water resources.



- 6.42. The NPPF states that ‘planning policies and decisions should contribute to and enhance the natural and local environment’ by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.
- 6.43. The Council will expect developments with the potential to cause pollution to provide a written assessment that considers the impacts of the proposal on the existing environment. This includes sources of pollution from the proposed development, including demolition and construction phases, which impact sensitive development or the environment. Proposals to introduce sensitive development to an area impacted by existing pollution will need to provide details of adequate mitigation through an assessment produced by a competent person or organisation. Proposals for development that would curtail the existing legitimate use of a site by exposing sensitive receptors to a detrimental level of pollution which was previously otherwise considered acceptable should be avoided. Where risks cannot be reduced to an acceptable level, permission will be refused.

Air Quality

- 6.44. Surrey Heath Borough is located in the south east of England to the south west of London. The main air quality issues are associated with the emission of pollutants from road traffic, in particular the M3 motorway. The main pollutant of concern is nitrogen dioxide (NO₂). The main source of nitrogen dioxide is from road traffic exhaust fumes, accounting for about 80% of all oxides of nitrogen produced here. In contrast, for particulate matter up to 90% of levels monitored in the Borough come from background sources, produced elsewhere. The Department of Food and Rural Affairs (DEFRA) has confirmed the following Air Quality Management Area (AQMA) in Surrey Heath:

‘The strip of land from Frimley Road Camberley to Ravenswood Roundabout Camberley which embraces the M3 Motorway and the houses on both sides of the motorway which border the highway’.

- 6.45. The release of fine particles and harmful gases into the atmosphere can have a significant impact on human health and the environment. The Council’s guidance on the planning application validation process sets out when an air quality assessment will be required to take account of the impact of new development on air quality. The Council will encourage the incorporation of technologies and the utilisation of green infrastructure to limit the impact of air pollution.



- 6.46. In 2005 Surrey Heath Borough Council produced an Air Quality Action Plan (AQAP) which included 51 actions, each with a timescale for achievement, associated with the AQMA. The Council produces a [status report annually](#) that includes an update on the action plan, and planning applications likely to impact the AQMA should have regard to its contents.
- 6.47. The Council will continue to work with partners to improve air quality in the Borough, including seeking to address high levels of nitrogen oxide deposition along the A331 Blackwater Valley Road which has been identified by DEFRA's national model as being in exceedance of the annual air quality objective for nitrogen dioxide. The Council will also encourage proposals to facilitate increased use of electric vehicles, which can have significant benefits for improving air quality and public health, by working in partnership with Surrey County Council to support the Electric Vehicle Strategy.
- 6.48. In considering the amount and location of future development in the Borough, the Council will also need to consider the cumulative impact of air quality and pollutants on Natura 2000 sites, Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and other designations such as Sites of Special Scientific Interest (SSSI) within the Borough. The Habitats Regulation Assessment of the Local Plan concluded that the Surrey Heath Local Plan will have no adverse effect on the integrity of any European sites either alone, or in combination with other plans or projects in relation to atmospheric pollution.

Noise, Lighting and Odours Pollution

- 6.49. Noise from a variety of sources, including road, rail, air, construction, entertainment venues and commercial and industrial activities, have the potential to impact on health and quality of life if not properly controlled or planned for. The adverse effects of excessive exposure to noise (and vibration) are well documented and rightly recognised as a material planning consideration. Noise is a key aspect of quality of life and social well-being, and therefore, by extension, sustainable development.
- 6.50. Development proposals will need to consider the noise impact within and surrounding the development site and demonstrate that any noise impacts comply with the Council's requirements, including requirements for good lighting design and good acoustic design to ensure existing noise sensitive receptors and future occupiers are protected. Consideration should also be given to protecting tranquil areas.
- 6.51. In considering measures to avoid, mitigate and reduce noise impacts, proposals will need to consider the basic principles of noise control:
1. Separate noise sources from sensitive receptors;
 2. Control the noise at source; and
 3. Protect the receptor.



- 6.52. Poorly designed artificial light can lead to glare, sky glow and light spillage which can have an adverse impact on neighbouring residents and wildlife. The Council will seek to limit the impact of artificial lighting by encouraging well-designed lighting schemes and will consider the impact of any lighting scheme on residents, highway users, the character of the area, wildlife, intrinsically dark landscapes and the visibility in the night sky. The Council will only permit proposals that will not adversely affect amenity, the natural environment or public safety.
- 6.53. Odours and fumes from commercial activities, including kitchens can have a detrimental impact on neighbouring residential amenity. Any siting of extractor flues should have regard to potential impact on neighbouring properties and the surrounding environment.

Contaminated Land

- 6.54. Full regard should be given to the [Council's Contaminated Land Strategy](#). The Council's Contaminated Land Strategy recognises that serious contaminated land issues in Surrey Heath are likely to be limited because of the relative lack of industrialisation. However, potential sources of contamination in the Borough may include:
1. The presence of the military activities such as waste disposal, gas works and some limited commercial and industrial activities could contribute to the potential for land contamination. Where development of such sites take place, the planning process should help manage any risk to existing and future site uses and site workers.
 2. Although there has been a lack of significant industrialisation, there have been a large number of smaller manufacturing activities, workshops, auto repair workshops.
 3. All brownfield sites have the potential to be contaminated. For example, due to the widespread use of asbestos prior to 1999, any brownfield site has the potential to contain asbestos fibres.
- 6.55. Applicants should provide a statement of land quality for development sites which have potential to be impacted by contamination from current or historical activities carried out on, adjacent or near to the site such that remediation may be required. Investigations and risk assessments must be carried out by a competent person, and follow the relevant British Standards and Environmental Agency guidance. The assessment shall identify contamination risk of soil, controlled waters, and ground gases, as appropriate.
- 6.56. Where contamination is revealed, adequate information, prepared by a competent person, should be made available to inform planning decisions. Applicants are required to submit and implement a scheme of remediation, appropriate to the proposed use, in cases where contaminated land is revealed. After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.



Demolition and Construction

- 6.57. Demolition and/or Construction Management Plans can help avoid, minimise or mitigate the impacts of construction practices on the environment and local communities. Such plans should set appropriate provisions relevant to the site that may include consideration of dust control, noise, vibration and lighting impacts.



Policy E5: Renewable and Low Carbon Energy and Heating Schemes

- 6.58. The delivery of renewable and low carbon energy and heating schemes plays an important role towards the mitigation of climate change.

Policy E5: Renewable and Low Carbon Energy and Heating Schemes

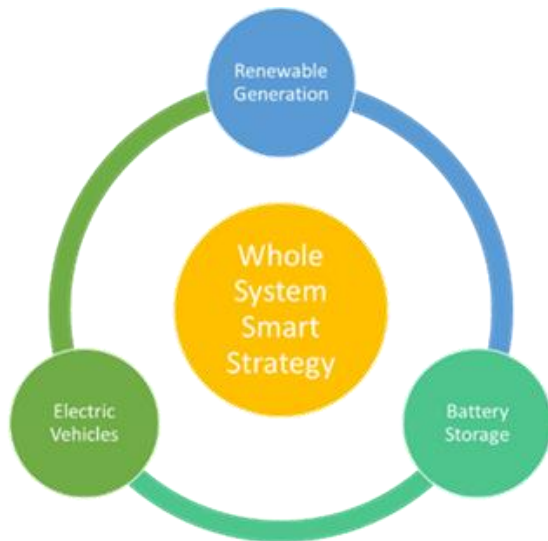
- 1) Proposals for stand-alone and community led renewable, low carbon and decentralised sources of energy and heating schemes will be supported, except for restrictions for wind energy development set out in the NPPF, provided that there is no significant harm to local amenity or to the built, historic and natural environments, in accordance with other policies in this Plan.
- 2) Major development proposals will be required to incorporate measures to supply a minimum of 25% of the development's regulated operational energy needs from on-site renewable and/or low carbon technologies, in accordance with national technical standards, unless it can be clearly demonstrated with evidence that this is not feasible and/or viable for this form of energy provision.

- 6.59. In order to meet national and local targets for reducing carbon emissions and national targets for decarbonisation of electricity, the UK and the Borough will need to significantly increase the supply of low and zero carbon energy. New developments can be a catalyst for decentralised energy network growth and major new developments should assess the feasibility and viability of incorporating measures to supply the developments energy needs from renewable and/or low carbon technologies.
- 6.60. Surrey's [Climate Change Strategy](#), which is supported by Surrey's 12 Local Authorities, includes the strategic priority to "Expand renewable energy generation capacity across the county with a focus on solar PV installations as the greatest carbon reduction potential." It identifies Surrey as an area with great potential for solar energy in particular.
- 6.61. The NPPF includes specific support for community energy schemes, stating that 'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning'.



- 6.62. Community energy schemes vary greatly in nature, and in general any impacts of schemes (e.g. visual impacts of solar) are offset by benefits to the local community, including financial returns for those who invest in shares (although the opportunity to invest is typically not limited to the local community) and benefits from profits reinvested locally.
- 6.63. The Surrey Heath Climate Change Study (2020) identifies that a primary climate change mitigation opportunity for the Local Plan is to support low carbon heating and heat networks. The Study notes that support for heat networks, or district heating schemes, should be a prominent spatial planning consideration, taking into account the location of strategic sources of heat and heat demand, support for concentrations of growth that will achieve the requisite density of heat demand and economies of scale, as well as support for mixes of uses in any given area such that there is a relatively smooth heat demand profile (also cooling) over time, and in particular across the day. Camberley town centre represents a major opportunity to deliver low carbon heating and cooling to thousands of residents and many local businesses.
- 6.64. In cases where viability concerns are raised, it will be necessary for negotiations between the Council and the applicant to take place to understand what has impacted the development's reduced viability or non-viability. In order for the Council to consider such circumstances an independent viability appraisal must be submitted. To ensure transparency, this will be published on the Council's website and developers will be expected to meet the costs of any financial appraisals commissioned by the Council as well as their own. Notwithstanding this the Council will not permit development if it would compromise the Council's ability to meet its duties under Section 19(1A) Planning and Compulsory Purchase Act 2004.
- 6.65. The Council will consider opportunities to define Heat Priority Areas. Opportunities in Surrey Heath could include Yorktown Industrial Area, Frimley Park Hospital and Camberley Town Centre. Should Heat Priority Areas be identified through the Local Plan, all sufficiently large and/or intensive proposals for development within such areas will be expected to demonstrate that consideration has been given to incorporating heat networks utilising low temperature heat sources/pumps or combined cooling, heating and power (CCHP).
- 6.66. To support a decarbonisation trajectory to net zero by 2050, as set out in Policy SS3a, the Council requires major development proposals to incorporate measures to supply a minimum of 25% of the development's energy and needs from renewable and/or low carbon technologies. Major development proposals should be supported by an energy statement detailing how renewable energy generation has been optimised and expected renewable electricity generation (kWh/yr). Applications for major development proposals should also consider the potential to deliver the electricity supply needs for electric or low emission vehicles through on-site renewable energy provision.



Figure 6 – Whole System Smart Strategy

- 6.67. The Surrey Heath Climate Change Study identifies that decentralised renewable power generation must be delivered alongside decentralised battery storage in order to balance supply and demand over the course of the day, and from day to day. This can be described as a Whole System Smart Strategy and will also be a critical tool in support of the electrification of heating (i.e. heat pumps). Such systems can be implemented at a range of scales, but of greatest relevance to the Local Plan is the community scale, where utility-scale battery storage systems connected to large renewable energy assets (e.g. rooftop solar arrays on public or industrial buildings) and integrated with publicly available rapid charge hubs for electric vehicles and public realm power loads (e.g. street lighting).

Policy E6: Flood Risk and Sustainable Drainage

- 6.68. The Council will ensure that development in the Borough reduces flood risk and minimises the impact of flooding from all sources, seeking to direct development to areas of lowest flood risk. Surrey Heath is subject to flood risk from a variety of sources, the M3 motorway directly discharges through several parish areas and the elevated Chobham ridges can promote rapid run-off from heathland, through natural valleys and built up areas. The Blackwater River is an historic source of flood risk affecting the western areas of the Borough, although flood incidents have reduced since construction of the A331 and associated work undertaken to the river.



- 6.69. The Bourne river catchments can affect the parishes in eastern areas, collecting flows from large expanses of open heathland, through minor watercourse and main-river routes before confluence at the Borough boundary. The Chobham Ridges divide the Borough run-off into two distinct areas, to the west a drop off towards the Blackwater River via Camberley, Deepcut, Frimley, Frimley Green and Mytchett; and a drop to the east drains towards the Bourne rivers affects the parishes of Bagshot, Bisley, Chobham, Lightwater, West End and Windlesham.

Policy E6: Flood Risk and Sustainable Drainage

- 1) Flood zones in Surrey Heath Borough are defined based on the definitions contained within national [Planning Practice Guidance \(PPG\)](#) and the Council's [Strategic Flood Risk Assessment](#) (Level 1) or as updated.
- 2) To ensure that development is safe from flooding from all sources for its lifetime, does not increase the risk of flooding elsewhere, and seeks opportunities to reduce the causes and impacts of flooding the Council will:
 - a) steer development to the areas with a lower risk of flooding from all sources;
 - b) apply the Sequential Test and Exception Test to site selection informed by existing evidence, where applicable; in accordance with the Surrey Heath Strategic Flood Risk Assessment;
 - c) consider all sources of flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses;
 - d) apply the sequential approach to site layout by locating the most vulnerable uses in parts of the site at the lowest risk of flooding;
 - e) assess the cumulative impacts of development on flood risk;
 - f) account for the impacts of future climate change; and
 - g) safeguard the 'undeveloped' flood zone for flood management purposes, with the exception of the provision of essential infrastructure.
 - h) support and encourage development that seeks to restore areas of functional floodplain, especially where this would provide opportunities for recreation, habitat restoration/enhancement and green infrastructure opportunities.
- 3) Development in areas at high or medium risk of flooding, as identified in the latest [Surrey Heath Strategic Flood Risk Assessment](#) and Environment Agency flood risk maps will be permitted provided it is demonstrated that:
 - a) a site-specific flood risk assessment demonstrates that the development, including safe access and egress, will be safe for its lifetime. This should take account of climate change, not lead to increased flood risk elsewhere and, where possible, reduce flood risk overall;



Policy E6: Flood Risk and Sustainable Drainage

- b) the vulnerability of the proposed use is appropriate for the level of flood risk on the site as outlined in Planning Practice Guidance;
 - c) where required, the proposal passes the exception test as outlined in the NPPF and national guidance;
 - 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;
 - e) the scheme provides a reduction in flood risk by providing some form of protection from flood risk by incorporating a flood defence, flood resilience or resistance measures as appropriate, providing it does not adversely impact adjacent sites;
 - f) for development proposals in the developed flood zone 3b, the footprint of the proposed building(s) is no greater than that of the existing building(s) and there will be no increase in vulnerability.
- 4) All development proposals are required to demonstrate that drainage provisions will be adequate and will not result in an increase of surface water run-off, in consultation with the lead local flood authority. Development must promote SuDS (Sustainable Drainage Systems) to manage surface water drainage, within the curtilage of the development. Where SuDS are provided, fully detailed documentation must be provided with the locations of any assets, maintenance regime and ownership (costs liability) clearly stated. Arrangements must also be put in place for the ongoing management and/or repair of any SuDS systems over their full lifetime. SuDS should:
- a) ensure that surface water containment with any associated flood risk is managed as close to the source as possible and does not increase flood risk elsewhere;
 - b) accord with all relevant building regulations, current at the time of development;
 - c) where appropriate, discharge of surface water to watercourse or sewer system is not to exceed pre-development (greenfield) runoff rates. Connection to a piped watercourse or public sewer will only be accepted where all alternatives have been justifiably discounted
 - d) be designed as multi-functional, incorporating storage (attenuation) into landscaping and public realm to improve amenity, biodiversity, and water quality; incorporating urban watercourse buffer areas and multi-use flood storage areas;



Policy E6: Flood Risk and Sustainable Drainage

- e) be designed with due consideration for ease of future maintenance of installed assets and retention of suitable flow routes for flood exceedance events.
 - f) Include allowances for future climate change and urban creep.
- 5) Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided if it can be demonstrated, through technical detail, that there will be no adverse impact on the quality of groundwater resource and it does not put any risk of the ability to maintain public water supplies.
 - 6) Development proposals are required to identify opportunities for Natural Flood Management, creating wetland features and reconnecting rivers with their floodplains in order to restore natural processes, enhance biodiversity and help manage flood risk.
 - 7) New basement development connected to the sewerage network shall be fitted with a suitable non-return flow control system, or utilise a pumped device. The installation of such a device will be secured where necessary by planning conditions.

Strategic Flood Risk Assessment

- 6.70. The Strategic Flood Risk Assessment (2021) undertaken by Capita identifies sources of flooding as fluvial (main-river surcharge), excess surface water (leading to sewer inundation), groundwater, or a possible breach of the Basingstoke Canal. River flooding and excess surface water run-off inundating the available sewer provision are the primary causes of flood risk in the Borough, with older areas also experiencing flooding from combined sewers, where the foul sewer is the only available provision for disposal of surface water flows.
- 6.71. More specifically, the assessment shows that fluvial flood risk is generally concentrated along natural valleys and where the land eventually levels off, including large areas of risk in the Bourne catchment (predominantly rural, undeveloped land), as well as the Blackwater (Loddon) catchment where its tributaries flow through more restricted urban areas, resulting in a risk to businesses and property. The assessment identifies areas most likely to experience increased surface water flood risk are along roads, depressions (natural valley lines), and land immediately adjacent to watercourses. The risk from groundwater flooding and breach of the Basingstoke Canal is identified as being low risk.



Climate Change

- 6.72. There is increasing concern about the impacts of climate change on the global environment. In the UK, projections indicate that climate change will result in more frequent, short duration, high intensity rainfall and more frequent periods of long duration rainfall. These changes are likely to result in a more frequent occurrence of all types of flooding, including fluvial. The NPPF emphasises that development plans should take a proactive approach to mitigate and adapt to climate change, taking into account the long-term implications for flood risk. The SFRA (2021) includes consideration for the impact of climate change on flood risk within and beyond the plan period.
- 6.73. The SFRA (2021) identifies that most recent climate change guidance, at the time of this Level 1 SFRA, was published by the [Environment Agency in February 2016 and have since been updated](#). This guidance supports the NPPF and must be considered in all new developments and planning applications. The guidance includes climate change predictions for the anticipated change of peak river flow and peak rainfall intensity. The SFRA identifies that planners and developers should consider where development may be at risk (or increased risk) of flooding in the future when undertaking the Sequential and Exception Tests, and that they should consult with the local authorities and seek the latest available guidance.

New Development

- 6.74. The SFRA will be used in the determination of planning applications for allocated and windfall sites. New development will need to minimise flood risk, including risk from surface water sewers and watercourses, and applications should have full regard to the SFRA in developing proposals. This should have regard to climate change, ensuring development is safe for its lifetime, that flood risk is not increased elsewhere, and that opportunities are sought to reduce flood risk overall. Any proposed development within areas of flood risk will require flood management and mitigation measures, to demonstrate that the development is safe from flooding and that flooding is not exacerbated elsewhere as a result of the proposals. Where appropriate or where requested by the planning authority, applications will need to be accompanied by a Flood Risk Assessment (FRA).
- 6.75. In accordance with the NPPF, site specific FRAs should be provided for:
1. Any development proposals located within Flood Zone 1, 2 and 3
 2. Any development site of 1 hectare or more
 3. Any land which the Environment Agency identifies as having critical drainage problems (no areas currently identified within Surrey Heath).
 4. Any land identified in a SFRA as being at increased flood risk in the future.
 5. Any land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.



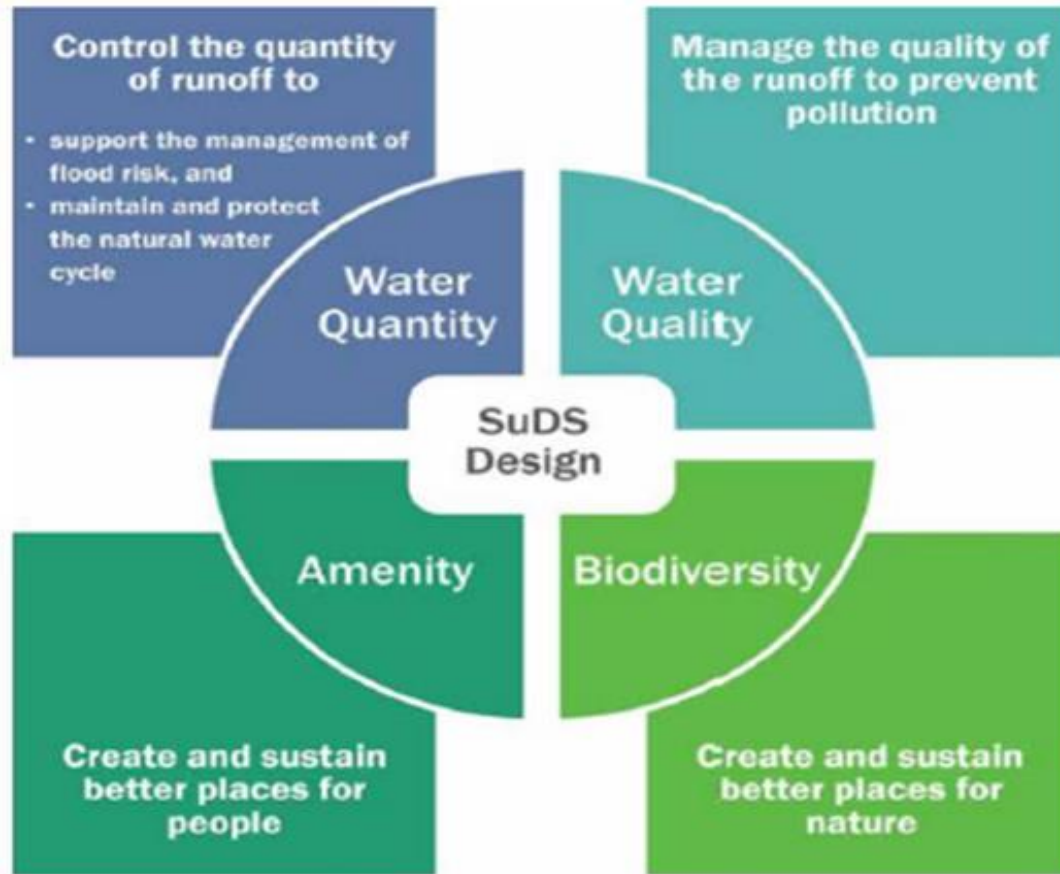
- 6.76. As identified in the SFRA (2021), where a FRA is required as part of the planning application, it is necessary for developers to prepare documents to the satisfaction of the decision maker who will seek the advice of the Environment Agency, Local Authority (Surrey Heath Borough Council) and the Lead Local Flood Authority (Surrey County Council) as necessary. Applicants are encouraged to demonstrate their proposal will deliver a reduction to the off-site flood risk. Site specific FRAs should be proportionate to the degree of flood risk, as well as being appropriate to the scale, nature and location of the development. The applicant should consider all potential sources of flooding, as well as the vulnerability to flood risk over the development's lifetime including any potential impact of climate change. Where flood defences, both formal and informal, are located within close proximity of the site, the residual risk to the site should also be assessed.

SuDS

- 6.77. Surface water run-off and overland flow occurs when rainfall is unable to soak into the ground or enter drainage systems. Often surface water flooding can be short-lived, lasting only briefly after the rainfall event. However, flooding may persist in low-lying areas, where ponding occurs, or where topography forces a reliance upon the use of piped drainage systems that may be prone to blockage by conveyed debris such as leaves or other vegetation. Managing surface water flooding at its source is the most effective way of minimising run-off from a site and preventing flood risk to the surrounding area. The Council therefore promotes the use of sustainable (SuDS) techniques to control flows within developments, reducing flood risk both within the site and to neighbouring areas, in-turn reducing pollution and providing landscape and wildlife benefits. In addition, SuDS should be designed to ensure they remain effective for storm events, enabling a fast entry of flows into containment systems. Under national policy, all major planning applications will require the inclusion of SuDS design. Although it is not mandatory for smaller schemes under current legislation, the Council does encourage use of SuDS wherever possible.
- 6.78. For SuDS to be fully sustainable they should seek to comply with the key SuDS principles as set out in Figure 8 below. Further guidance on SuDS is provided in the Surrey Heath SFRA.



Figure 8: Four Principles of SuDS Design (Source: The SuDS Manual C753 Ciria 2015).



Critical Drainage Areas

- 6.79. In accordance with the recommendations of the SFRA (2021), Surrey Heath Borough Council will continue to work with Surrey County Council to identify Critical Drainage Areas (CDAs), promote development policies to ensure that future development does not increase flood risk, and generally seek to reduce the existing risk wherever possible.



Policy E7: Watercourses and water quality

- 6.80. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WER) set a methodology for measuring ecological health across a river catchment ecosystem and chemical health. All surface waterbodies are required to achieve 'good' ecological and chemical status (or 'good' ecological potential for heavily modified and artificial waterbodies).
- 6.81. The Borough's watercourses and their corridors are an important resource that provide multiple benefits including habitats of high ecological value, flood mitigation, wildlife corridors and a contribution to landscape character.

Policy E7: Watercourses and water quality

- 1) In order to protect and enhance main rivers, the Council will;
 - a) Require development proposals to explore opportunities to improve and/or restore the flow and functioning of a watercourse.
 - b) Require development proposals within a minimum buffer zone of 10 metres of a main river, measured from the top of the bank on both sides of a main river, to retain or reinstate an undeveloped buffer zones
 - c) Require work within this buffer zone to be supported by a working methods statement detailing how the buffer zone will be protected during construction, and a Management Plan detailing how it will be enhanced in the long term.
 - d) Not permit development proposals within this buffer zone that include hard bank revetment or prevents future opportunities for the naturalisation of riverbanks.
 - e) Not permit development proposals that include the culverting of watercourses or which prevent opportunities for of de-culverting, subject to minimal access requirements with appropriate remedial works.
 - f) Expect an appropriate buffer for ordinary watercourses that is sufficient to protect and enhance the biodiversity and amenity value of the watercourse.
 - g) Expect development proposals to return banks back to their natural state or to install suitable natural reinforcement where ground conditions are considered unstable.
- 2) To improve the flow and water quality of water bodies, the Council will:
 - a) Not permit development that that would result in a deterioration in the chemical and/or ecological status/potential of a waterbody, or prevent improvements to the chemical and/or ecological status/potential



Policy E7: Watercourses and water quality

- b) Require development proposals that contain or are within the vicinity of a waterbody to demonstrate that they have explored all opportunities to improve its chemical and ecological status/potential.
- c) Require development proposals covered by the Water Environment Regulations to align with the objectives of the [Thames River basin district River Basin Management Plan](#).

- 6.82. Development can be an important mechanism for bringing about improvements to riparian environments. However, it can also negatively impact watercourses in many ways including through encroachment and loss of river corridor habitat, disturbance, pollution, impacts on hydromorphology and river processes.
- 6.83. In order to protect and enhance main rivers, a minimum 10 metre undeveloped buffer on both sides provides the minimum width of habitat that is needed to provide for the functioning of wildlife habitats and facilitate informal access for enjoyment of the river. Maintaining an undeveloped 10 metre buffer zone for main rivers ensures that development does not have an adverse impact on ecology and hydro morphology and has a range of benefits, including helping wildlife adapt to climate change through the provision of wildlife corridors and open floodplain storage.
- 6.84. Buffer zones should be planted with locally native species of UK genetic provenance and appropriately managed. Schemes that provide a buffer zone will be supported by a working methods statement detailing how the buffer zone will be protected during construction. The buffer zone and river corridor should become or continue to be a valued part of the green infrastructure network.
- 6.85. Ordinary watercourses are expected to be provided with a minimum 8m buffer on both sides. Established vegetation may vary the extent of the buffer and this will be decided on a case-by-case basis but must be adequate to enable the protection and enhancement of the watercourse, riparian environment and water quality. Where possible, a 10 metre buffer should be provided.
- 6.86. Development proposals that seek to replace natural watercourse embankments will not be considered to align with WER objectives. The loss of natural banks resulting from hard bank protection has negative impacts on ecology and hydromorphology. Hard bank protection alters a river's natural hydromorphological processes of erosion and deposition which are important for in-stream habitat creation. In addition, natural banks themselves provide habitat for a range of terrestrial and aquatic species.



- 6.87. Any modifications to a main river will require consent from the Environment Agency and any modifications to an ordinary watercourse require consent from the Lead Local Flood Authority.
- 6.88. Watercourses can be subject to pollution from a number of sources including sewage, agriculture, Nitrogen Oxides (NO_x) from traffic exhaust fumes, plastic/rubber particles from vehicle tyre road wear, and are subject to further harm through water shortage. This is likely to become an increasing problem due to the effects of climate change. Improving the flow and water quality of rivers is therefore necessary in order to restore their biodiversity value.
- 6.89. The Environment Agency has published the River Basin Management Plan (RBMP) for the Thames River basin district. This statutory document sets objectives and identifies projects and measures in order to achieve WER targets.
- 6.90. The River Wey & tributaries; Addlestone Bourne (R04) and River Blackwater (R03) Biodiversity Opportunity Areas set a framework for habitat recovery for those two rivers. The Basingstoke Canal is designated as a Site of Special Scientific Interest (SSSI) for much of its length, and the section that runs through Surrey Heath is largely within Biodiversity Opportunity Area TBH04: Ash, Brookwood & Whitmoor Heaths.
- 6.91. Development proposals that would harm the WER status of a waterbody, or would hinder the achievement of WER targets, will not be permitted. There are very limited circumstances where such developments may be permitted, set out in WER regulation 1988. In the event that such a development is proposed, the Council will seek legal advice on the application of the legislation.
- 6.92. Development proposals that contain or are in the vicinity of a waterbody covered by the WER should work with the relevant catchment partnership to identify measures that will help to deliver WER and RBMP objectives. The SyNP maintains a list of catchment partnerships on its website.



Policy E8: Landscape Character

- 6.93. Landscape character comprises the distinct set of elements that makes a landscape recognisable, which gives it a unique sense of place. The Borough contains a variety of landscapes, including heathland, farmland, river valleys and woodland which have a distinctive character and are a valuable resource for the Borough. In the countryside (including the Green Belt) key positive landscape attributes should be protected in order to preserve the landscape character of the Borough.

Policy E8: Landscape Character

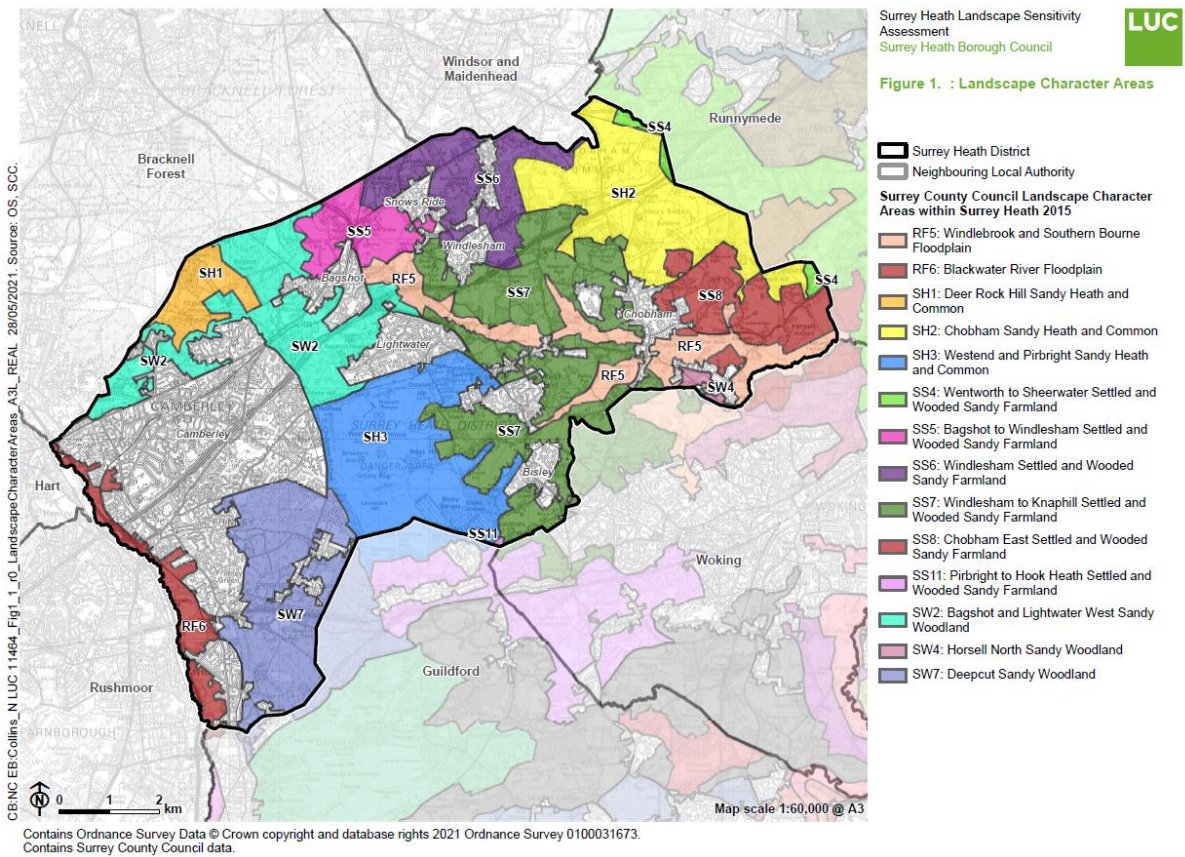
- 1) Development proposals will be permitted which respond to, and wherever possible enhance, the special character, key positive landscape attributes, value and landscape setting of settlements.
- 2) Development proposals should demonstrate that:
 - a) they can integrate with, and positively contribute to the landscape character of the area;
 - b) they are sited and designed so as to avoid any adverse impact on key positive landscape attributes identified in the Surrey Landscape Character Assessment and the Surrey Heath Landscape Sensitivity Assessment;
 - c) they are sited and designed to minimise landscape and visual impacts, in line with the analysis, guidance and strategies provided in the Landscape Character Assessment and Landscape Sensitivity Assessment;
 - d) they consider cumulative impacts with other existing and proposed development;
 - e) there is no adverse impact on historic landscapes and registered parks and gardens; and
 - f) they respect the role the landscape plays in the setting of settlements as set out in relevant landscape sensitivity or other study.
- 3) Where development proposals will have an impact on the landscape, a comprehensive landscaping proposal to show how the development would successfully integrate with the landscape and surroundings will be required.



- 6.94. The NPPF identifies that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for matters including the conservation and enhancement of the natural, built and historic environment including landscapes. The NPPF also seeks to ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting and sets out that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. The PPG also highlights that landscape character assessments should be prepared to complement Natural England's National Character Area profiles.
- 6.95. The diverse countryside of Surrey Heath plays a key role in defining the Borough's character and unique identity and is an important part of what makes the Borough an attractive place to live, work in and visit. The countryside within the Borough also performs a number of other roles, with 44% of land within the Borough forming part of the metropolitan Green Belt and as an area of importance for biodiversity in the central heathland areas.
- 6.96. The Surrey Landscape Character Assessment (2015) forms part of the evidence base from which development and management strategies can be derived, with particular reference to the conservation, enhancement or restoration of the landscape. A landscape character assessment is the process of mapping, classifying and describing the patterns and variations which contribute to the character of the landscape. The Surrey Landscape Character Assessment (2015) identified four broad Landscape Character Types (LCT) within the Borough:
1. River Floodplains (RF)
 2. Sandy Heath and Common (SH)
 3. Settled and Wooded Sandy Farmland (SS)
 4. Sandy Woodland (SW)
- 6.97. These LCTs are further refined into 13 Landscape Character Areas (LCA) as shown in Figure 9 below.



Figure 9 – Landscape Character Areas



- 6.98. In order to better understand the relative sensitivity of the Borough's landscapes to residential development and identify opportunities for enhancement, the Council commissioned LUC to prepare a Landscape Sensitivity Assessment (2021) (LSA) for land outside settlements in the Borough. This study carried out strategic scale assessment of the LCA within the Borough and was guided by the advice contain in Natural England's 'Approach to landscape sensitivity assessment' (DEFRA, 2019).
- 6.99. The LSA study provided evidence of the underlying character of the landscape highlighting aspects of the landscape which are sensitive to future change and set out management guidelines for each of the character areas. The study assessed the landscape sensitivity as a measure of the resilience, or robustness, of a landscape to withstand specified change without undue negative effects on the landscape and visual baseline and their value.



- 6.100. Landscape sensitivity assessment requires judgements on both landscape susceptibility and landscape value (consensus about importance, which can be recognised through designation as well as through indicators of value such as landscape quality/ condition, scenic quality, rarity, representativeness, conservation interests, wildness, tranquillity and associations with particular people, artists, writers, or other media, or events in history).
- 6.101. The assessment set out the key characteristics and strategy (from the landscape character assessment), as well as a sensitivity evaluation and guidance on potential for mitigation and enhancement measures to reduce adverse effects on landscape and views and to maximise benefits arising from development. These guidelines should be taken into consideration when considering development proposals within these areas.
- 6.102. The landscape sensitivity can be used to inform planning decisions. Development proposals should take account of the landscape sensitivities and key positive landscape attributes of the site and surrounding area at an early stage of design. Proposals should strengthen and enhance landscape character and local distinctiveness wherever possible. This will include consideration of natural, socio-cultural, and perceptual aspects of character and using information set out in the Surrey Landscape Character Assessment and the Landscape Sensitivity Study and any subsequent studies. This information should be included in a design and access statement, masterplan, landscape proposal or Landscape and Visual Impact Assessment.
- 6.103. Proposals will be considered on a site by site basis based on their own merits, however they should ensure that any new landscape components are in character with the locality, form part of a coherent green infrastructure network and provide ecosystem services. It is important that valued features proposed for retention and areas for proposed enhancement and mitigation are clearly shown on a plan, as well as features that may be lost, so that the overall impact on landscape character can be properly assessed. A proportionate approach will be expected to be taken, based on the sensitivity of the landscape and the nature of the proposed development.
- 6.104. Appropriate measures will depend on the type of landscape in which the development is proposed, as set out in the Surrey Landscape Character Assessment and the Landscape Sensitivity Study. Management plans should be provided to indicate how the landscape will be managed to ensure its successful establishment and development.



- 6.105. The 2021 study also considers the built character of each landscape character area with particular reference to the presence of heritage assets that contribute to landscape character (i.e. valued features that may be designated as Conservation Areas, Scheduled Monuments, listed buildings, archaeological features or remains or other features). Landscapes with a higher density of historic features important to the character of the area are likely to be more sensitive to the introduction of modern development.
- 6.106. Registered Parks and Gardens also make an important contribution to the landscape character of the Borough and these are dealt with under heritage assets section later in the Plan (Policy DH7).



Section 7: Green Belt and Countryside

- 7.1. 43% of Surrey Heath is designated as part of the Metropolitan Green Belt. The main aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. The Green Belt – including that in Surrey Heath – has a diverse range of functions. It protects land for agriculture, forestry and nature conservation; it is also a place for living and working in, as well as providing opportunities for people to access the countryside.
- 7.2. The Green Belt within Surrey Heath will be preserved and enhanced, in line with national policy. The NPPF sets out that, by definition, inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF indicates that whilst the construction of buildings within the Green Belt is generally inappropriate, there are some exceptions. It also sets out where the overall openness of the Green Belt should be preserved in order to prevent certain other forms of development from being inappropriate. This enables the Green Belt to continue to respond to changing needs.
- 7.3. The following policies set out the approach to development within the Green Belt in Surrey Heath and apply in addition to guidance set out within the NPPF.

Policy GBC I: Development of new buildings within the Green Belt

Policy GBC I: Development of new buildings within the Green Belt

- 1) The development of new buildings within the Green Belt will be permitted where they are consistent with the exceptions listed in national planning policy and the requirements of this policy.
- 2) Where new buildings are proposed to replace buildings that are not lawful or are temporary in nature, the loss of these will not be taken into account in assessing the proposal.
- 3) Inappropriate development will not be permitted unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.



Policy GBC1: Development of new buildings within the Green Belt

Proposals relating to Replacement Buildings

- 4) In assessing whether proposals for replacement buildings are materially larger than those they are to replace, regard will be had to the impact upon the Green Belt of the visual and spatial characteristics of the development, including:
 - a) the bulk, mass, volume, height and distribution of the proposed building, together with any other structures and hardstanding compared against that it is to replace;
 - b) the siting or the position of the proposed building, which should substantially overlap that of the original building, unless it can be clearly demonstrated that an alternative position would not increase the overall impact upon the openness of the Green Belt.
- 5) The replacement of an existing building with a building in an alternative use will only be considered where very special circumstances can be demonstrated that outweigh harm to the Green Belt, in line with criterion 3.

Proposals affecting Previously Developed Land

- 6) In assessing proposals for the partial or complete redevelopment of previously developed land, regard will be had to the resultant impact upon the openness of the Green Belt arising from the changes between existing and proposed development, taking account of:
 - a) the existing and proposed bulk, mass and volume of the development;
 - b) the general height and storeys of existing and proposed buildings, structures and hardstanding and their disposition around and within the site.

Limited Infilling

- 7) Limited infilling will only be acceptable within the Green Belt outside of defined settlement areas as designated on the Policies Map where it can be demonstrated that the site is considered to be within the village.

Other development

- 8) Certain other forms of development are also considered not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, and these are listed in the NPPF.



- 7.4. In accordance with the NPPF, the Council recognises that in certain circumstances, new buildings are not inappropriate in the Green Belt. Where possible, new development should positively enhance the beneficial use of the Green Belt and be appropriate in scale, form and function to minimise development and preserve the openness of the Green Belt.
- 7.5. Replacement buildings with an external volume of 15% over that of the building being replaced will normally be considered as materially larger. This percentage guideline is intended to support the openness and permanence of the Green Belt, which are its essential characteristics. In assessing proposals for replacement buildings, the Council will calculate volume using the basic formula of area multiplied by height, based on the external structure. Planning applications for extensions and other alterations to existing buildings within the Green Belt should be accompanied by detailed volumetric calculations. Consideration should also be given to the visual characteristics of replacement buildings. It is recognised that development which exceeds the 15% guideline may be acceptable in some circumstances. Similarly, proposals to increase volume by less than 15% may still be considered as materially larger, when assessed in the round.
- 7.6. The inclusion of a basement does not preclude it from being taken into account when considering whether a proposed replacement building is materially larger. Basements may also be considered to impact upon the openness of the Green Belt, depending on their design. For instance, a basement that is wholly subterranean and served only by discreet light wells, ventilation systems or means of escape will have a lesser impact upon openness than one that is only partially subterranean.
- 7.7. The impact of any other ancillary aspects of a development proposal including (but not limited to) garages and other outbuildings, walls and gates, areas of hardstanding and their use and external storage on the openness of the Green Belt will be considered under the requirements of the NPPF. Cumulatively, these may have an unacceptable impact on the openness of the Green Belt.
- 7.8. Previously developed land is defined within the NPPF as land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings (including polytunnels and glass houses); land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.



- 7.9. In line with the NPPF, 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. In order to meet the 'substantial harm' test, proposals will need to demonstrate that there is a genuine local affordable housing need within that settlement/parish area which is otherwise unlikely to be met. Unlike rural exception sites, proposals do not need to comprise of solely affordable housing, nor is the level of market homes restricted to that necessary to make the scheme viable. For that reason, the Council's normal affordable housing requirement as set out in Policy H7 will be applicable for all schemes.
- 7.10. In assessing proposals for the limited infilling or redevelopment of previously developed land, different locations and forms of development will present different site-specific characteristics. In this regard, the details of any application will be judged on its own individual merits. When considering proposals for previously developed land, the starting point is an assessment of the impact of existing development upon the openness of the Green Belt in comparison to that of the development proposed. For example, an existing area of hard standing can be regarded as 'development' but its impact on openness is significantly less than a proposed building.
- 7.11. In respect of siting, applicants are encouraged to take the opportunity to make improvements to the openness of the Green Belt where possible, taking into account the particular visual sensitivity of open and prominent locations. This could include focusing development in a less conspicuous or open part of a site or removing a sprawl of buildings in favour of a single, cohesive development that leaves the remainder of the site open.
- 7.12. In cases where the successful implementation of a proposal is not physically dependent upon the demolition of an existing building, but the demolition of an existing building is considered integral to the acceptability of the scheme on Green Belt grounds, conditions and where necessary, legal agreements, will be used to secure demolition of the identified existing buildings, either prior to construction or as otherwise agreed with the Local Authority.
- 7.13. In some instances, the Council may also apply conditions to remove permitted development rights. In such cases, the Council will also expect any qualifying development undertaken or implemented between the granting of consent and the commencement of development to be demolished within one month of the approved development coming into use. This will also be controlled by condition.



- 7.14. As set out within the NPPF, development within villages in the Green Belt is restricted to limited infilling. For the purposes of this policy, limited infilling is considered to be the development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing properties within such a frontage. The infill plot should be comparable in size and shape to those developed plots which adjoin the site and must have an existing frontage to a road. It should be appropriate to the scale of the locality and not have an adverse impact on the character of the surrounding countryside or the local environment.
- 7.15. Case law has now established that limited infilling is applicable to all villages and not restricted to sites that fall within identified settlement boundaries in local plans. The built form of villages inset within the Green Belt, including Chobham, Windlesham, Bagshot, Lightwater, West End and Bisley extends wider than the settlement boundary. In some circumstances, proposals in these locations may also be considered to form part of an adjacent village, even if they lie outside of the defined settlement area. Such proposals will need to be assessed on a case-by-case basis. There are a number of considerations to take account of when assessing whether a site is located within a village. This will include factors such as the pattern of development and the proposed development's relationship to the built-up area of the village and the surrounding countryside. It is expected that infill plots will be clearly connected to the defined settlement area by continuous built development. Infill development will not be permitted where it would result in the merging of settlements.
- 7.16. For the avoidance of doubt, settlements at Castle Grove, Mimbridge and Brickhill are not considered to constitute villages for the purposes of this Policy.

The Borough's Climate Change Action Plan and also Local Plan objectives D and E sets out objectives to deliver improvements to green infrastructure. Land management for nature recovery and/or enhancements to green infrastructure may give rise to the need for development. When located in the Green Belt, buildings to support habitat management for nature recovery may comprise inappropriate development, for example, where these are essential facilities, but the land management activity is not agricultural or forestry. In such cases applicants will need to demonstrate very special circumstances. Such very special circumstances may include the biodiversity and wider environmental benefits including climate change resilience arising from increased ecologically focused land management activities.



Policy GBC2: Development of Existing Buildings within the Green Belt

Policy GBC2: Development of Existing Buildings within the Green Belt

Extensions or alterations to an existing building

- 1) The extension or other alteration of a building within the Green Belt will be permitted where it does not result in disproportionate additions over and above the size of the original building. In considering whether an extension or other alteration to an existing building is disproportionate, consideration will be given to the spatial and visual characteristics of the development, including:
 - a) The bulk, mass, volume and height of the proposed development together with any previous extensions or enlargements, including works carried out under permitted development;
 - b) the location of the proposed development in relation to the existing building;
 - c) any changes to built form, including roof form; and,
 - d) alterations to the footprint which may increase the spread and site coverage or materially increase the prominence of the building.
- 2) Where extensions are proposed to replace buildings that are not lawful or are temporary in nature, the loss of these will not be taken into account in assessing the proposal.

Re-use of buildings

- 3) The re-use of buildings will be permitted where proposals preserve the openness of the Green Belt. In assessing proposals for the re-use of buildings, regard will be had to:
 - a) the condition of the building, which must be structurally sound and capable of conversion without major alterations, adaptations or reconstruction;
 - b) the extent of ancillary works or features required to support the re-use of the building, such as external storage, hardstanding, car parking, boundary walling or fencing and the impact that this would have upon the openness and character of the Green Belt;
 - c) whether the proposal would restore/retain a building of architectural or historic interest.



- 7.17. The extension or alteration of a building in the Green Belt is not considered in national or local planning policy to constitute inappropriate development, providing that the proposed development is not disproportionate to the size of the original building and therefore by definition harmful to the openness of the Green Belt. The original building is taken to be the building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.
- 7.18. Extensions which would increase the external volume of the built form by 30% or more over that of the original building or structure will normally be considered as disproportionate. The percentage guidelines which apply to extensions and other alterations to existing buildings are intended to support the openness and permanence of the Green Belt, which are its essential characteristics. In assessing proposals for extensions or alterations, the Council will calculate volume using the basic formula of area multiplied by height, based on the external structure. Planning applications for extensions and other alterations to existing buildings within the Green Belt should be accompanied by detailed volumetric calculations.
- 7.19. The inclusion of a basement does not preclude it from being taken into account when considering whether proposals for extensions are disproportionate. Basements may also be considered to impact upon the openness of the Green Belt, depending on their design. For instance, a basement that is wholly subterranean and served only by discreet light wells, ventilation systems or means of escape will have a lesser impact upon openness than one that is only partially subterranean. Consideration should also be given to the visual characteristics of development. In synthesising the spatial and visual characteristics of development proposals, it is recognised that development which exceed these guidelines may be acceptable in some circumstances. Similarly, proposals to increase volume by less than 30% may still be considered as disproportionate, when assessed in the round.
- 7.20. Case law has indicated that proposals to erect a new ancillary building in close proximity to a main building may be treated as an extension to the main building, taking into account the proximity of the proposed building to the main building. This will be assessed on a case by case basis. The volume and footprint of any lawful existing buildings to be demolished within a site may in some cases be included in the increase in volume and floor space of the extension, taking into account their size, permanence, design and proximity to the building to be extended.



- 7.21. In cases where the successful implementation of a proposal is not physically dependent upon the demolition of an existing building, but the demolition of an existing building is considered integral to the acceptability of the scheme on Green Belt grounds, conditions and where necessary, legal agreements, will be used to secure demolition of the identified existing buildings, either prior to construction or as otherwise agreed with the Local Authority. In some instances, the Council may apply conditions to remove permitted development rights. In such cases, the Council will also expect any qualifying development undertaken or implemented between the granting of consent and the commencement of development to be demolished within one month of the approved development coming into use.
- 7.22. The re-use of agricultural or rural buildings provides opportunities for the diversification of the rural economy and contributes to the economic growth of the area. It can also contribute towards the reduction in demand for new buildings in the Green Belt and can be a means of conserving traditional buildings which are a distinctive feature within the Borough's rural landscape. Buildings can often be converted without causing material harm to the open character of the Green Belt. However, the Council recognises that particular uses or levels of use can either directly or indirectly have an adverse effect. For example, whilst the re-use of a vacant building for residential accommodation in itself may be acceptable, some associated features such as fences and walls, driveways, domestic paraphernalia and ancillary buildings could harm the openness of the Green Belt. The effect of these and similar features will be assessed when dealing with re-use applications.
- 7.23. The re-use of buildings that are not lawful, or that are temporary in nature, will not be permitted.
- 7.24. The re-use of buildings may also give rise to the need to re-accommodate the displaced use. The proposal should not result in the need to construct an additional building unless it can be clearly demonstrated that the building to be re-used is no longer suitable to accommodate the use concerned and the new building is otherwise compliant with the NPPF and Policy GBC1.



Policy GBC3: Equestrian Uses in the Green Belt and Countryside Beyond the Green Belt

- 7.25. Within the rural areas of Surrey Heath there are many equine related businesses and facilities ranging from large scale livery stables and stud to small scale private equestrian facilities.
- 7.26. Equine related development can impact upon rural areas through the proliferation of associated ancillary development, overgrazing of pasture and use of Bridleways. However, the Council also recognises the positive role that equestrian use can play in the rural environment if properly managed and the positive role it has to play in the rural economy and access to recreational opportunities. Horse riding is also known to improve mental and physical health as demonstrated by the charity Riding for the Disabled.

Policy GBC3: Equestrian Facilities

- 1) Equestrian related development within the Green Belt and Countryside beyond the Green Belt will be permitted where the following criteria are met:
 - a) The amount of development proposed is demonstrated to be reasonably related to its intended use and the amount of pasture land available;
 - b) The re-use of existing buildings is prioritised;
 - c) Any new development required to accommodate the use has been demonstrated to be necessary and is suitable in respect of its siting, design, scale, layout, external materials and appearance;
 - d) The proposal would not adversely impact upon the character of the landscape, the nature conservation value of the land and the quality of the pasture, by reason of overgrazing or otherwise;
 - e) The development would not have a detrimental effect on the amenity of neighbouring properties and the wider local area by reason of noise, smell, overlooking, light pollution or other general disturbance in accordance with Policy E4; and
 - f) The development is sustainably located in terms of general accessibility and in relation to the existing bridleway network, and/or common land where the Right to Air and Exercise (on foot and on horseback) exists (Sec. 193 of the Law of Property Act 1925 now Section 15 of CROW 2000” of horses).
- 2) In addition to the criteria above, proposals for equestrian facilities within the Green Belt will be expected to preserve the openness of the Green Belt and not conflict with the Green Belt purposes and be consistent with Policies GBC1 and GBC2.



- 7.27. The Council will seek to ensure that the scale of any equestrian related development, including cumulative impacts, is appropriate to its current or proposed operation, whether private facilities or commercial businesses. The Borough Council considers that equestrian related development should retain or maintain a compact form and will resist proposals which would lead to dispersed forms of development. The Borough Council will seek to ensure that any stabling and ancillary development is appropriately scaled and sited in order to maintain the open and rural character of the countryside and Green Belt.
- 7.28. The level of provision of pasture proposed for horses will be assessed on a case-by-case basis. The Council will also look at any constraints on the use of the land such as existing or proposed buildings and landscape features e.g., access tracks, trees or watercourses, which would reduce the total amount of 'useable' pasture available for horses. Applications for stables or looseboxes on land below 0.4 hectares may only be considered acceptable where the applicant demonstrates an adequate provision of accessible, available land to allow for the proper care (exercise and grazing) of the proposed number of horses. In all cases, applicants will be expected to demonstrate the adequate provision of land to allow for the proper care of horses, including stabling, grazing and exercise, in accordance with the [Equine Industry Welfare Guidelines](#) and the [British Horse Society standards](#).



Policy GBC4: Development within the Countryside Beyond the Green Belt

- 7.29. Beyond the Green Belt, Surrey Heath includes areas of open countryside which separate the settlements of Camberley and Frimley, Mytchett, Deepcut, Bagshot and Lightwater. Incorporating extensive tracts of open heathland and gently undulating woodland, the countryside of Surrey Heath plays a key role in defining the Borough's character and is an important part of what makes the Borough an attractive place to live, work in and visit. In addition to playing a key role in the Borough's character, the countryside within the Borough performs a number of other roles: as an area of importance for biodiversity in the central heathland areas, as a leisure resource for the Borough, ecosystems services such as water quality, flood water attenuation, heat regulation and carbon storage in vegetation and soils and as a location for army barracks, military ranges, training areas and test tracks.
- 7.30. Within Surrey Heath, the intrinsic rural character of the countryside will be protected and enhanced; coalescence of settlements and the encroachment of inappropriate development into rural areas will be resisted. The countryside is therefore subject to a restrictive policy approach that recognises its intrinsic character, whilst ensuring that the countryside is able to respond to changing needs through appropriate, small-scale development.

GBC4: Development within the Countryside beyond the Green Belt

- 1) The Council will protect areas of countryside for their intrinsic character and beauty. Development within the countryside beyond the Green Belt will only be permitted where it meets one or more of the following:
 - a) It consists of the re-use of a permanent and lawful building for alternative uses;
 - b) It comprises an extension or the replacement of an existing building;
 - c) It relates to a site allocated within Policy HAI;
 - d) It would meet proven essential need of a rural worker to live permanently at or near their place of work;
 - e) It supports the development or diversification of agricultural and other land-based enterprises;
 - f) It would provide for the growth and expansion of businesses in rural areas in accordance with Policy ER5;
 - g) It consists of operational development directly linked to institutional and other facilities and the need is proven;
 - h) It would provide a site for Gypsy and Traveller pitches or Travelling



GBC4: Development within the Countryside beyond the Green Belt

Showpeople plots that meet identified needs within the Borough;

- i) It provides an exception site suitable for first time buyers in line with Policy H10 – First Homes Exception Sites;
 - j) It relates to the partial or complete redevelopment of previously developed land;
 - k) Provides small scale, informal recreation facilities required in association with a new or existing outdoor recreation use; and,
 - l) Other minor forms of development ancillary to the development/uses set out above.
- 2) Development within the countryside must:
- a) not lead to harmful physical or visual coalescence between settlements;
 - b) be sustainable for the proposed use and of a high quality of design;
 - c) not cause unacceptable harm and where possible, enhance the open character and integrity of the countryside;
 - d) be proportionate to the nature and scale of the site and its setting.
- 3) The Council will encourage schemes that result in environmental and landscape improvement, enhance biodiversity and nature conservation, and support better accessibility by sustainable means.

- 7.31. It is recognised that some development can take place which is beneficial to the countryside and the people that live and work there. Development in the countryside will therefore be permitted where it can be demonstrated that a countryside location is necessary and sustainable. Inappropriate forms and types of development will not be supported.
- 7.32. For the purposes of this policy rural workers are defined as workers engaged primarily in farming, forestry or other rural based industries. In assessing need, account will be taken of whether there is a clear functional requirement for the person to be readily available on the site. Consideration will also be given to whether the worker is fully or primarily employed on the site, whether the business is financially sound and has a clear prospect of remaining so, the size of the proposed dwelling (which should be commensurate with the established functional requirement); and whether the need can be met by an existing dwelling on the site. Evidence on these matters should be submitted with any planning application. An appropriate condition or legal agreement restricting occupancy will be required to ensure it remains for the purpose for which it was granted. Applications which are primarily made on the grounds of providing security will not generally be supported.



- 7.33. There are a number of commercial and institutional uses operating in the countryside where development may be required for operational purposes or to support sustainable economic growth. Such uses include educational and training institutions, Ministry of Defence facilities, offices and agricultural and land-based business which require a rural location. Development proposals within these sites should be appropriate in scale to the site's rural context and should be located, designed and mitigated in a way that minimises their impact on the countryside, for example by siting new buildings within the existing built envelope.
- 7.34. It is important to deliver a wide choice of homes to meet the needs of different groups in the community including planning for affordable homes in rural areas, and for specialist types of housing including sites for Gypsies and Travellers and Travelling Showpeople which meet the requirements of Policy H11. To meet identified local housing needs, it may be appropriate to permit first homes exception sites within the countryside, in line with National Policy.
- 7.35. The introduction of substantial built form into the countryside has the potential to have a harmful urbanising impact on the countryside. In considering the impact of proposals for the redevelopment of previously developed land and replacement buildings upon the openness of the countryside, the scale and impact of the proposed development will be compared with the scale and impact of any existing building(s) to be demolished.
- 7.36. Applicants will be encouraged to take the opportunity to make improvements to the openness of the countryside where possible, which could include focusing development in a less conspicuous or open part of a site or removing a sprawl of buildings in favour of a single, cohesive development that leaves the remainder of the site open. Wherever possible the development should enhance the openness when viewed from the street or public footpaths.
- 7.37. Buildings can often be converted without causing material harm to the character of the countryside. However, the Council recognises that particular uses or levels of use can either directly or indirectly give rise to adverse impacts. For example, whilst the re-use of a vacant building for residential accommodation in itself may be acceptable, some associated features such as fences and walls, driveways, domestic paraphernalia and ancillary buildings could harm the open character of the area. The effect of these and similar features will be assessed when dealing with re-use applications. The re-use of buildings may also give rise to the need to re-accommodate the displaced use. The proposal should not result in the need to construct an additional building unless it can be demonstrated that the building to be re-used is no longer suitable to accommodate the use concerned. A building will only be considered for 're-use' when the original construction was lawful.
- 7.38. New development should not lead to the host building becoming more visually intrusive in the countryside.



- 7.39. Small scale developments such as interpretation boards or shelters, small interpretation centres, bird watching hides and minor car parking areas will be permitted where they enable enhanced enjoyment of the countryside, particularly rights of way, for visitors, subject to there being no significant adverse impacts for example on landscape, ecology, designated sites, and traffic.
- 7.40. The impact of any other ancillary aspects of a development proposal such as outbuildings, walls and gates, areas of hardstanding and their use and external storage on the character and integrity of the countryside will be considered. Cumulatively, these may have an unacceptable impact on the countryside.
- 7.41. In some parts of the Borough the towns and villages are relatively close together. Maintaining the separation between settlements will ensure that the settlements remain distinct from each other, in addition to providing green infrastructure benefits and supporting wildlife networks close to settlements. Development on the edge of these settlements can reduce the physical extent of the gap and development within the gaps themselves could reduce the visual separation of settlements. Development of any type that would result in a perception of the settlements coalescing and losing their separate identity will be refused. In some circumstances limited development may be acceptable, for example where the proposal is of a rural character, e.g., agricultural buildings, and has a very limited impact on the existing gap between the settlements.

Policy GBC5: Gordon’s School, West End

- 7.42. Gordon’s School lies wholly within the Green Belt to the north of West End. The school is a non-selective state boarding school which caters for around 850 students aged 11 –18.

Policy GBC5: Gordons School

- 1) Proposals for redevelopment or infilling on the site as shown on the Policies Map should not have a greater impact on the openness of the Green Belt than the existing development in line with Policies GBC1 and GBC2.
- 2) In addition, development proposals should:
 - a) form part of a comprehensive masterplan for the site; and
 - b) not affect the significance or setting of the Grade II listed buildings within the site in line with Policy DH7; and
 - c) not exceed the general height of the existing buildings; and
 - d) demonstrate that there are no alternative locations for the proposed development on site that will have a more minimal impact on the openness of the Green Belt or on heritage assets; and



Policy GBC5: Gordons School

- e) incorporate sympathetic boundary treatment to mitigate the visual impact of the School site on the surrounding countryside.

- 7.43. Gordon's School was founded as the Gordon Boys' Home in 1885 by public subscription as a National Memorial to Gordon of Khartoum, an officer of the Corps of Royal Engineers, who was killed in 1885. The school website claims that the idea came from Queen Victoria, who was its first patron. The reigning monarch of the United Kingdom has been patron ever since.
- 7.44. The school site covers an area of about 17.7 ha with a core area of about 6.5ha. The site straddles the A319 Bagshot Road. The main campus is to the south of Bagshot Road and comprises a range of buildings dating from late 19th Century to more modern teaching accommodation. There are four Grade II listed buildings in the core part of the site.
- 7.45. The northern part of the site contains the main playing fields, car parking and ancillary buildings. A new sports hall with changing rooms and ancillary facilities and a new All Weather Pitch were permitted in 2018 and has now been completed. A footbridge link over Bagshot Road links the two parts of the site.
- 7.46. The area included within this Policy comprises previously developed land. The school is a high performing school and over the lifetime of this Plan may require further alterations and improvement. Any development will have to meet national and local Green Belt policy requirements as well as the criteria set out in GBC5.



Section 8: Design and Heritage

Policy DHI: Design Principles

- 8.1. High quality design integrates buildings and places, is fit for purpose, built to last and a delight to use. It creates places that people can enjoy with ease and which are responsive to their surroundings. High quality design addresses sustainability from the outset, and is based on the social, visual and functional dimensions of a place. New development will be required to achieve a high quality of design that responds effectively to the needs and character of the area in which it is set and contributes positively to the retention and enhancement of the quality of life of existing and future communities. The Council will strive to ensure that new development leads to the creation of beautiful and sustainable buildings and places.
- 8.2. Good design can create and sustain economically and socially successful places with a clear identity that promote healthy living and a strong sense of community. Places should be well-connected, easy to navigate, provide natural security through layout and design whilst providing attractive, well defined and overlooked streets, roads and spaces with clear thought given to the relationship between land uses and their surrounding environment.
- 8.3. Policy DHI covers all forms of development within the Borough, however not all criteria will apply to all forms or scales of development. For example, development proposals for householder extensions will need to have particular regard to the impact of development upon character and residential amenity, but will not be capable of maximising connectivity or opportunities for pedestrian and cycle movement. As such the application of Policy DHI should be proportionate to the development proposed.

Policy DHI: Design Principles

- 1) All development must achieve a high standard of design that positively contributes to placemaking. Development proposals should be design-led and will be of a high quality and inclusive design that respects local distinctiveness and utilises opportunities to improve the character and quality of the area.
- 2) Development will be permitted where it is demonstrated that it:
 - Local character**
 - a) respects the distinct local character of the area and responds to and reinforces locally distinct patterns of development and their rural, village or urban setting paying particular regard to, scale, height, density, massing, bulk, materials and detailing.



Policy DHI: Design Principles

- b) incorporates a level of architectural detail and use of materials that responds to the distinct local character of the area.
- c) protects trees and other vegetation worthy of retention and includes high quality hard and soft landscaping that respects the distinct local character.
- d) would not have a detrimental impact upon heritage assets or their setting, in line with their significance.

Residential amenity

- e) provides a high standard of residential amenity, including privacy and amenity space for future occupants appropriate to the proposed use.
- f) would not adversely affect the amenities enjoyed by the occupants of neighbouring properties, having regard to loss of daylight and sunlight, loss of privacy, overbearing impact and pollution.

Climate Change

- g) be designed and constructed to provide for the comfort, health, and wellbeing of current and future occupiers over the lifetime of the development, covering the full range of expected climate impacts and with particular regard to the risk of internal overheating.

A Healthy Place

- h) enables and supports healthy lifestyles, in accordance with Policies SS3a and SS3b, taking into account the design of buildings, streets and neighbourhoods.

Safe, connected and efficient places

- i) maximises permeability to enable good pedestrian and cycle movement through the development to support healthy living and the creation of a high quality public realm.
- j) connects appropriately to existing street patterns, taking into account connectivity with the surrounding area, local services and, where relevant, the relationship and connectivity between the development and other sites allocated under Policy HAI – HA4.
- k) successfully integrates functional needs such as refuse, recycling, bicycle and car parking.
- l) takes account of the needs and practicalities of services and long term management of public and shared private spaces and facilities.
- m) maximises the opportunity for linkages to green spaces and other public places.



Policy DHI: Design Principles

- n) takes a comprehensive and co-ordinated approach to development including respecting constraints arising from the presence of utilities situated within sites.

Crime prevention and security measures

- o) would reduce opportunities for crime and antisocial behaviour through the layout, specification and positioning of buildings, spaces and uses in line with national Secured by Design standards.
- p) provides a safe and legible structure for public realm and private spaces.

Access and inclusion

- q) meets the needs of all users, taking into account the setting of the building in the wider environment, the location of buildings within the site, the gradient of the plot, transport infrastructure and public realm.
- r) is flexible towards future adaptation in response to changing life needs.

Infrastructure to create smart places

- s) includes provision of up to date digital communications infrastructure in accordance with Policy IN3.
- 3) In developing proposals, regard should be had to general and area specific local design and character guidance contained within Conservation Area Appraisals, Neighbourhood Plans and Supplementary Planning Documents (SPDs), including design codes.

Back Garden Land

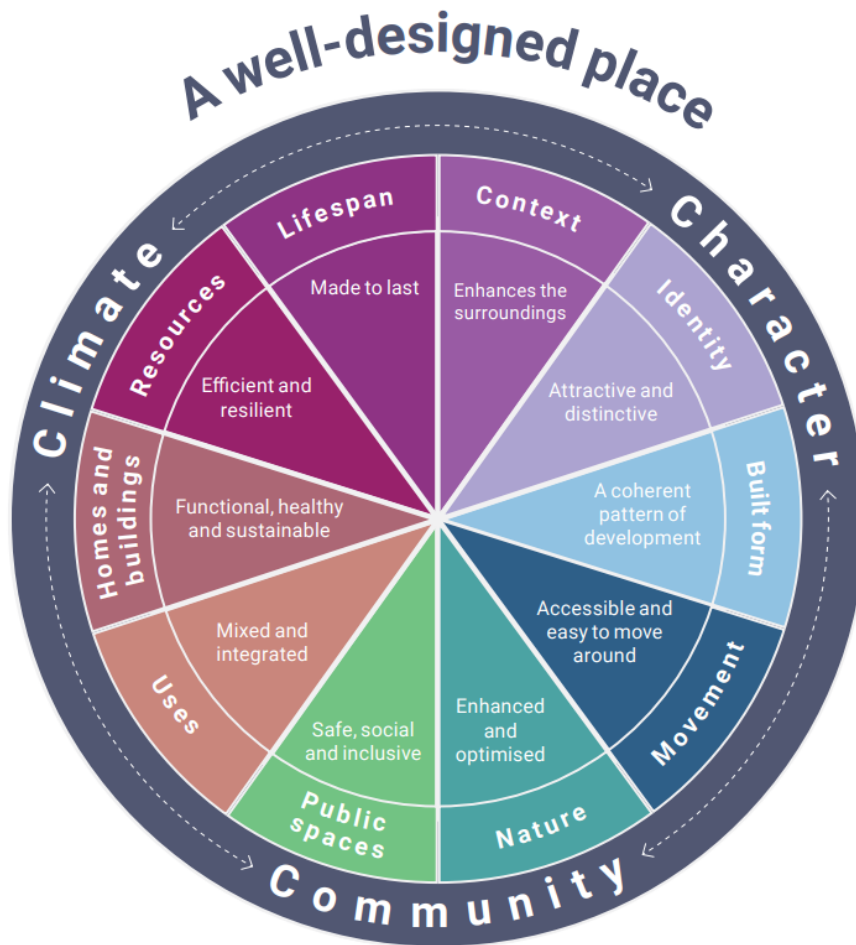
- 4) Proposals for the development of back garden land will be permitted where it is demonstrated that:
- a) The size of the plot is sufficient to accommodate development without detriment to the surrounding pattern of existing development.
 - b) Access has been well-integrated into the host street scene and provides safe pedestrian and cycling access, in addition to suitable access for emergency and refuse vehicles.
 - c) The privacy of existing and proposed residential properties is respected by the proposed layout and access arrangements and would not give rise to unacceptable impacts in terms of noise or light on the existing dwellings.
- 5) The development of back garden land will not be permitted where the site, either individually or as part of a larger street block makes an important contribution to the character and appearance of the surrounding area.



- 8.4. The NPPF makes clear that creating high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development and creates better and healthier places in which to live, work and visit.
- 8.5. Planning Practice Guidance signposts to the [National Design Guide](#) for detailed guidance and also advocates the application of assessment frameworks such as the Building for a Healthy Life assessment framework. The National Design Guide illustrates how well-designed places, which are beautiful, healthy, greener, enduring, and successful, can be achieved in practice. The National Design Guide sets out the ten characteristics of well-designed places, which work together to create physical character, nurture and sustain a sense of community and work positively to address environmental issues affecting climate change. Figure 10 shows a visual illustration of the ten characteristics of well-designed places.
- 8.6. The National Model Design Code provides detailed guidance on the production of design codes, guides and policies to promote successful design and expands on the ten characteristics of good design set out in the National Design Guide. Design codes can provide a framework for creating healthy, greener, environmentally responsive, sustainable and distinctive places, with a consistent and high-quality standard of design.



Figure 10: The National Design Guide ten characteristics of well-designed places



8.7. The Council recognises that good design is indivisible from good planning. A range of economic, social and environmental benefits flow from high quality design; it creates attractive, sustainable and resilient places that function effectively for all users. Poor design on the other hand has the potential to detract from people’s day to day lives through poor building relationships, car dominant layouts and substandard public realms which add little to local distinctiveness; it can contribute to poor physical and mental health and without an attractive, high quality physical environment, places may struggle to attract investors and visitors. The Council is therefore committed to ensuring that the design of all types of development is of a high quality.



- 8.8. High quality design should respond to and enhance local character, whether rural, village or urban, through its positive contribution towards architecture, public spaces and natural and historic environments including the setting of designated and non-designated heritage assets, whilst allowing for innovative and forward thinking design. The physical and visual relationship between the built environment and the immediate and wider setting must be taken into account, including open views and vistas. Linkages to adjacent green areas and the transition from rural to urban character will need to be reflected in the design approach, with green approaches to settlements respected.
- 8.9. Building in connectivity and permeability to developments has multiple benefits that extend beyond site boundaries. By increasing connectivity between people, places and services, places become more sustainable, vibrant and healthy. Considerations in respect of connectivity will vary depending on the scale and location of development and the opportunities provided by the local area. Opportunities to build in connectivity and permeability to developments should be identified at the outset when considering the design of new development proposals. Particular regard should be had to maximising connectivity between sites allocated under Policy HAI where they adjoin, or lie in close proximity to one another.
- 8.10. The quality of the built and natural environment is a key environmental determinant of health and wellbeing outcomes. Well designed buildings and places are intrinsically linked to human health; this is recognised within the National Design Guide and the [Healthy Streets for Surrey design code](#). It is estimated that illness and injuries caused by poor housing cost the [NHS £1.4 billion a year](#) on a national scale. Poor quality housing has particularly detrimental effects on the people who spend most time at home, such as the elderly, young children, people with ill health, home-workers and the unemployed. New buildings and places offer the opportunity to deliver high quality, healthy, efficient homes and spaces for generations to come. Good quality homes and neighbourhoods will support and enhance the physical and mental health of the people who live there. Adaptable and accessible homes help people remain independent and in good health for longer, supporting their participation in their community and wider society.
- 8.11. The [Surrey Heath Climate Change Study 2020](#) identifies the contribution that good design plays in addressing climate change mitigation and adaptation. A good quality home will be designed to keep people healthy in our future climate, allowing for warmth through the winter months while avoiding overheating during the summer months through appropriate design. The design of new development should also consider the potential to maximise the provision of onsite renewable energy, for example solar PV, through appropriate design.



- 8.12. The Council supports the delivery of walkable neighbourhoods, including the principles of the 20 minute neighbourhood, recognising that a complete, compact and connected neighbourhood where people can meet their everyday needs within a short walk or cycle has multiple benefits including boosting local economies, improving people's health and wellbeing, increasing social connections in communities, and tackling climate change.
- 8.13. In 2015 a security element was introduced within the Building Regulations in England, however this addressed the detailed design of dwelling houses only, omitting other forms of development and the wider built environment. High quality, well-planned design can reduce the opportunity for crime and anti-social behaviour beyond the front door through careful consideration of the layout, materials and environmental design of development. Secured By Design (SBD) is a police initiative that provides useful guidance on crime prevention and security measures and promotes improvements to the security of both buildings and the wider public realm to provide safe places to live, work, shop and visit.
- 8.14. Policy H5 sets out accessibility requirements for new dwellings, however accessibility should not be a consideration for new dwellings alone; it is essential for accessibility considerations to be taken into account at the outset when considering the design of new development proposals. This will ensure that developments are resilient to changing needs and inclusive, enabling access to as many people as possible, regardless of age, gender and disability.
- 8.15. To encourage high quality design, the Council will expect strategic proposals incorporating 50 or more dwellings or exceeding 10,000sqm in floor space to be subject to assessment by a Design Review Panel. Design Review Panels are organised by Design South East (DSE) and provide impartial expert advice to applicants and local authorities on design issues in relation to important new development schemes. The Design Review Panel's feedback is a material consideration for local authorities when determining planning applications and are best undertaken at a pre-application stage.



- 8.16. The NPPF indicates that planning permission should be refused for development that is not well designed, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents (SPDs) such as design guides and design codes. Paragraph 134 also sets out that significant weight should be given to development which reflects local design policies and government guidance on design (including local guidance and SPDs) and to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design in an area where they fit in with the overall form and layout of their surroundings. The Council has a wide range of adopted design guidance including the Residential Design Guide SPD, in addition to the Borough's Conservation Area Appraisals, Neighbourhood Plans, Design Codes and other Supplementary Planning Documents (SPDs). These should all be taken into account at the outset when considering the design of new development proposals.



Policy DH2: Making effective use of land

- 8.17. The NPPF emphasises that planning policies should support development that makes efficient use of land.
- 8.18. Optimising the density of development will assist the Borough in meeting its housing targets; it can also assist in reducing car use and boost the commercial viability of existing services and facilities by concentrating development in the most sustainable locations.

Policy DH2: Making Effective Use of Land

- 1) Residential development will be permitted where it makes efficient use of land, in a manner compatible with the site itself and the local character of the area.
- 2) Site allocations will be expected to deliver the minimum density specified within Policies HA1 – HA5 of the Local Plan. Proposals for all other major residential developments are expected to achieve the following minimum net densities, based on their location in the Borough:

Location	Minimum Net Density (dwellings per hectare)
Camberley Town Centre	100dph
Sites within 800m walking distance of railway stations at: <ul style="list-style-type: none"> • Bagshot; • Frimley; • Blackwater; • Camberley (outside of Camberley Town Centre). 	70dph
The Western Urban Area, comprising: <ul style="list-style-type: none"> • Bagshot; • Deepcut; • Frimley; • Frimley Green; • Mytchett. 	40dph
Defined Settlement Areas of: <ul style="list-style-type: none"> • Bisley; • Chobham; • Lightwater; 	30dph



Policy DH2: Making Effective Use of Land

<ul style="list-style-type: none"> • West End; and, • Windlesham (including Snows Ride). 	
<p>3) Proposals that do not meet these density standards will only be permitted where it has been demonstrated that development at the identified density would be inappropriate.</p> <p>4) Proposals for minor residential development are expected to demonstrate how they have achieved an efficient use of land.</p>	

- 8.19. The National Planning Policy Framework (NPPF) indicates that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is important that planning policies and decisions avoid homes being built at low densities; developments should make optimal use of each site. To this end, the NPPF indicates that plans should incorporate minimum density standards for town centres and other locations well served by public transport that seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. In accordance with the National Planning Policy Framework, it may also be appropriate to introduce minimum density standards for other parts of the Local Plan area.
- 8.20. Sites allocated within the Surrey Heath Local Plan have already been scrutinised to determine their optimal density, taking into account the sustainability of their location, the need to accommodate a mix of uses (where relevant), housing mix, significant environmental and policy constraints including the impact upon trees and heritage assets and the need to provide on-site infrastructure, such as SANG.
- 8.21. For sites not allocated within the Local Plan, Policy DH2 identifies a range of densities, and seeks to concentrate higher densities where there are more sustainable transport opportunities and a range of facilities and employment opportunities available, including Camberley Town Centre and sites with 800m of railway stations at Bagshot, Blackwater, Camberley (outside of the town centre) and Frimley. The policy then cascades this approach to apply an appropriate density to the Borough’s other settlements.
- 8.22. Where major development sites are subdivided to create separate development schemes, the site will be considered comprehensively and the Council will seek the appropriate density to be achieved across the entire site.



- 8.23. In some cases, there may be strong reasons why development at the identified density would be inappropriate and the densities specified should be treated flexibly. Considerations in this regard may include the optimum housing mix, significant environmental and policy constraints including the impact upon trees and heritage assets, consistency with Design Guidance/Codes, local market conditions and viability, the need to provide on-site infrastructure, such as SANG, amenity and the desirability of maintaining an area's prevailing character and setting (including residential gardens).
- 8.24. In accordance with the National Planning Policy Framework, planning applications will be refused where it is considered that they fail to make efficient use of land and no robust justification for the deviation from the Council's density requirements has been provided.



Policy DH3: Residential Space Standards

- 8.25. The Government's Housing Standards Review 2015 introduced a national space standard for new dwellings and optional requirements in relation to access and water efficiency. The review was aimed at simplifying the regulation of technical standards and co-ordinating the approach across the planning and building control regimes. Policy DH3 applies the nationally described technical standard to residential development within the Borough.

DH3: Residential Space Standards

- 1) Where planning permission is required, proposals for new residential development (Use Class C3) must ensure that the internal layout and size meet up-to-date nationally described technical housing standards for minimum internal space requirements.

- 8.26. These standards deal with internal space within new dwellings and are suitable for application across all tenures. It sets out requirements for the gross internal area (GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. Further information is provided in the [HM Government, Technical housing standards – nationally described space standard \(2015\)](#). The justification for introducing this standard in the Borough is set out in a Housing Standards Background Paper on the Local Plan evidence webpage.
- 8.27. Applicants are required to demonstrate how the internal space standards have been applied and are encouraged to provide floor plans not smaller than 1:100 scale, with metric room dimensions identified and the gross internal area (GIA) clearly identifiable. Housing which exceeds minimum dwelling sizes will be encouraged.
- 8.28. This Policy also applies to applications for changes of use and conversions to residential use. From April 2021 changes to the Town and Country (General Permitted Development) (England) Regulations mean that all residential units delivered under permitted development rights must meet the Nationally Described Space Standards.



Policy DH4: Sustainable Water Use

- 8.29. Water stress is a key issue in Surrey Heath. The [Surrey Heath Climate Change Study 2020](#) recognises that the entire central-southern part of England is classed as water stressed, and this situation is set to worsen significantly due to climate change, with an increasing reliance on major infrastructure to store and transport water from parts of the country that are not water stressed.
- 8.30. A proactive approach is therefore needed to take full account of water supply and demand considerations, including whether the application of a tighter water efficiency requirement for new homes is justified to help manage demand.

DH4: Sustainable Water Use

- 1) All new homes are required to meet the water efficiency standard of a maximum of 110 litres per person per day, to be achieved through compliance with the Building Regulations.
- 2) New non-residential development of 1,000 sq. m. gross external area (GEA) or more will provide evidence on completion, through the submission of a post-construction BREEAM certificate, of achievement of the BREEAM 'excellent' standard for water consumption (or any national equivalent).
- 3) All new developments are expected to incorporate measures for the storage and use of rainwater (greywater recycling) for non-potable uses in order to further reduce the need to draw upon limited resources.

- 8.31. The NPPF expects plans to take a proactive approach to mitigating and adapting to climate change, taking into account long-term water supply considerations, including whether the application of a tighter water efficiency requirement for new homes is justified to help manage demand.
- 8.32. All new homes already have to meet the mandatory national standard set out in the Building Regulations of 125 litres per person per day. However, where there is a clear local need, local planning authorities can set out a Local Plan policy which requires new dwellings to meet the tighter Building Regulations optional water efficiency requirement of 110 litres per person per day.



- 8.33. Water provision in Surrey Heath is under the jurisdiction of South East Water within the west of the Borough and Affinity Water in the east of the Borough. In respect of the evidence available to justify the requirement to meet the tighter water efficiency standard, the Environment Agency report 'Water Stressed Areas: Final Classification' (2021) identifies that the South East Water and Affinity Water areas are characterised by serious water stress, this is based on current and future water usage and climate change scenarios.
- 8.34. The Hart, Rushmoor and Surrey Heath Water Cycle Study (AECOM, May 2017) recommends water use per person per day for new homes meets the specific water use standard of 110 l/h/d in line with the Building Regulations Optional Requirement (the Regulations already require developers to submit such evidence before a completion certificate can be granted) and that non-domestic building should as a minimum reach 'Good' BREEAM status. On the basis of this evidence, the Local Plan requires a tighter water efficiency requirement of a maximum of 110 litres per person per day in the construction of all new dwellings over the Plan period, which will be secured by condition. A fittings based approach should be used to determine the water consumption of development.

Policy DH5: Trees and Landscaping

- 8.35. Trees are a defining characteristic of Surrey Heath; they provide important local landmarks, transform roads into green corridors and make a valuable contribution to the character and quality of urban environments. They complement the built environment by providing screening, perspective, privacy and seclusion and define open spaces. They also provide a valuable resource in terms of biodiversity, amenity and for climate change adaptation and mitigation, providing habitats for a range of wildlife and forming a "carbon sink" helping to absorb and counteract the harmful effect of carbon dioxide emissions.
- 8.36. The NPPF states that planning policies should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks, green spaces and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible across development sites. Applicants should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.
- 8.37. It is important that the benefits of trees, hedgerows and woodland are considered in relation to the need for development and, that existing trees are safeguarded and opportunities are taken to increase provision.



Policy DH5: Trees and Landscaping

- 1) Development proposals will be permitted where:
 - a) it can be demonstrated that trees, hedgerows and woodland of amenity or other value can be retained as an integral part of the design of development unless the requirements of 2) have been met; and
 - b) sufficient space is provided for trees and other vegetation to mature; and
 - c) provision is made for the care and protection of existing trees and hedgerows to be retained prior to, during and after the construction process, including measures for the long term management and maintenance of existing and new trees and landscaping.
- 2) Trees will be protected for their significance, amenity or other value. This means that:
 - a) Development that results in the loss or deterioration of ancient woodland or ancient or veteran trees will only be permitted where there are wholly exceptional reasons in line with the NPPF and a suitable compensation strategy has been agreed;
 - b) Development that involves the felling or significant pruning of trees not covered by (a) that are identified for their amenity or other value will only be permitted where it has been demonstrated that all options to avoid unnecessary tree loss have been explored and where it has been clearly evidenced that the public benefits of the loss of the trees offsets the wider value of the trees.
- 3) Where tree loss has been agreed, sustainable replacement planting will be provided within the development site on a greater than 1:1 basis to support levels of canopy cover and contribute to biodiversity net gain. In exceptional circumstances, an off-site contribution may be agreed with the Council.
- 4) Where practical and appropriate, additional tree planting is encouraged to improve the quality of the local environment and species appropriate canopy cover.
- 5) Landscaping is an integral element in layout design. Trees and landscaping schemes for new residential development and commercial floorspace will be expected to:
 - a) provide new trees and landscaping appropriate to the landscape profile of the area;
 - b) provide non-invasive native species or species attuned to climate change adaptation;
 - c) ensure that, by nature of their location and species choice, they are designed so as to facilitate adaptation to climate change by providing shade, shelter and cooling; and,



Policy DH5: Trees and Landscaping

- d) provide sufficient space/soil volume within the development and between development and the highway in a defined highways verge to enable new streets to be tree lined and for trees to survive into maturity.

- 8.38. Trees are a valuable resource. They contribute to the quality and character of Surrey Heath's unique environment, provide for the attenuation of noise, support wildlife and provide local ecosystems services, such as microclimate regulation, air filtration and water management. These services are a strategic element in mitigating the effects of climate change. Trees and green spaces can also help us physically healthier and improve our mental wellbeing. An estimated 40% of Surrey Heath is treed. For these reasons and for their intrinsic value, the Council places great weight on the retention of existing trees and hedgerows wherever possible.
- 8.39. Particular consideration will be given to veteran or ancient trees, as defined by Natural England, in order to preserve their historic, ecological and amenity value. Due to their special status, planning permission will be refused for development which would result in the loss or deterioration of Ancient Woodland, or ancient, aged or veteran trees unless there are wholly exceptional reasons, in line with the NPPF. Encroachment into the root protection area of ancient or veteran trees will be resisted. The root protection area is a buffer zone at least 15 times greater than the trunk diameter of the tree, or 5m from the edge of its canopy, if that is greater.
- 8.40. Where new development is proposed the preference will always be to incorporate trees and significant hedges into the development. Any impact on existing trees will be considered not just from an amenity point-of-view, but also with regards to the environmental impact and climate emergency. Early engagement with a professional arboriculturist in conjunction with the Council is encouraged through the pre-application service. This early dialogue will help identify trees of amenity, arboricultural or other value (which may be of a mixed age) that should be retained and will assist in identifying planting opportunities within a well-designed sustainable layout, thereby preventing conflicts between the proposal and retained as well as proposed trees at the preliminary stage.



- 8.41. Where a proposed development retains existing trees on-site, a satisfactory arboricultural impact assessment should be submitted in accordance with BS5837:2012 (or the equivalent applicable standard should this be superseded) and the Surrey Heath validation checklist. This statement should analyse the potential impact on the retained trees. Where proposed development would have an impact on trees, particularly where it would impinge on root protection areas of trees both within and outside the development site, a site specific arboricultural method statement should be submitted in accordance with BS5837:2012 (or the equivalent applicable standard should this be superseded) and the Surrey Heath validation checklist. The statement should demonstrate mitigation measures are in place to ensure that development works do not harm the existing tree.
- 8.42. Where trees are proposed to be removed, the applicant is expected to demonstrate to the Council's satisfaction that that all options to avoid the loss of the trees have been explored and that the wider public benefits of the loss of the trees (for example where a tree seriously affects public safety due to a defect) would outweigh the wider amenity and other value of the trees. Wider public benefits of tree loss will be considered by the Council on a case-by-case basis.
- 8.43. Development layouts must be designed to ensure that both existing and new trees are able to grow and mature in an appropriate level of space, both above and below ground. Schemes that are likely to give rise to considerable post-development pressure to prune or remove trees in the future, or that are likely to limit their future potential canopy size and leaf area through physical barriers will be resisted.
- 8.44. Where it is agreed that trees are to be lost, replacement tree planting will be considered as a priority. Development will be permitted subject to adequate compensatory provision being made. This should in the first instance take the form of the replanting of tree(s) of appropriate size and species (including mature or semi-mature trees) on the application site or in the vicinity on a greater than 1:1 basis. In exceptional circumstances where it has been evidenced that it is not possible to accommodate replacement tree planting within the site or its vicinity, a financial contribution equivalent to the value of the removed tree(s) will be sought. This will be calculated using an appropriate assessment calculation agreed with the Council such as CAVAT or an alternative method to be agreed with the Council. In considering the amount and suitability of replacement planting, regard will also need to be given to the requirements of Policy E3: Biodiversity Net Gain, where relevant.
- 8.45. Where the correct design process is not followed and trees are pre-emptively removed before progressing a planning application, the Council will require substantive replacement tree planting of the same or similar species, in order to enhance and maintain the character of the area. In development proposals where there is evidence of deliberate neglect of or damage to protected trees, the deteriorated state of the asset will not be taken into account.



- 8.46. Tree lined streets play an important role in defining the character of an area as recognised in the NPPF; they provide a feeling of countryside living for both rural and developed areas. These trees, as well as hedges, help to soften built form and reduce the overall effects of climate change by providing shade and reducing airborne pollution, as well as enhancing biodiversity. They can also create attractive green screens between new buildings and the highway, making more attractive places to live and work.
- 8.47. Proposed landscaping and/or replacement planting schemes must allow sufficient space and soil volume within the development scheme to accommodate replacement trees and canopy dimensions for new or replacement trees at full maturity and should be in line with any future tree replacement policy to ensure a form of development that respects and enhances the visual amenity of the landscape. Sufficient space and soil volume can be a particular concern in the case of street trees. As such, any planned new roads are expected to provide sufficient space and rooting environment for trees to mature and thrive, in line with the NPPF and any subsequent update. Where this is not possible, consideration should be given to the use of specific engineering solutions, such as soil cells.
- 8.48. Planting of native species or species attuned to climate change adaptation will be preferred. New planting should be appropriate to and contribute to the character of the location in both the short and longer term, and should be non-invasive.
- 8.49. Where specific on or off-site planting proposals are negotiated as part of the overall enhancement of a particular development site, the replacement, protection and long-term maintenance of trees, shrubs and other natural features would normally be specified by condition or secured by a planning obligation, either a section 106 agreement or unilateral undertaking. Larger scale enhancement of green infrastructure would be funded directly through the Community Infrastructure Levy.

Policy DH6: Shopfronts, signage and advertisements

- 8.50. Well-designed shopfronts and associated signage add to the character and quality of the Borough and play an important part in defining vibrant and distinctive town, village and local centres which attract people and encourages businesses to establish themselves. Policy DH6 seeks to ensure that shop fronts, signage and advertisements contribute to the character of the Borough's town and village centres and neighbourhood parades.

Policy DH6: Shopfronts, Signage and Advertisements

- 1) Development proposals for new, or changes to, existing shop fronts will be



Policy DH6: Shopfronts, Signage and Advertisements

permitted where they:

- a) relate well to the building in which they are situated, having regard to scale, proportions, vertical alignment, architectural style and materials;
- b) present an open and active frontage to the street;
- c) retain and restore where possible existing historic shopfronts and features of architectural interest;
- d) take account of good architectural features of neighbouring shop fronts so that the development will fit in well with the street scene particularly if located within a conservation area or on a heritage asset.

2) Advertisement consent will be granted where:

- a) the location, scale, proportions, form of illumination, design and materials of the advert respects the character and appearance of the host building (including any historic significance), site and area;
- b) the number of adverts is kept to a minimum to ensure that there is no harmful cumulative impact on the host building and/or the amenity of the area; and
- c) there is no harmful impact to public safety or residential amenity.

8.51. The National Planning Policy Framework (NPPF) recognises that good design creates better places in which to live and work. The good design of shopfronts, signage and advertisements will contribute to the viability, vitality and attractiveness of the Borough's commercial environments. The NPPF also recognises that the quality and character of places can suffer when advertisements are poorly sited and designed.

8.52. Well-designed shopfronts and advertisements that integrate effectively with their host building and bring visual interest to the street scene will contribute to the vitality and viability of the Borough's shopping areas. They will help the Borough's shopping areas to remain competitive in the face of competition from other centres and online retail by contributing towards the development of an attractive retail environment where people will want to linger.



- 8.53. In designing shopfronts, attention should be paid to materials, style, proportion and size of windows and fascias and to any relevant Design Codes or Design Guidance. Traditional shop fronts may incorporate a number of components including vertical glazing bars, recessed entrance doors, stall risers, fascias and pilasters topped with sometimes decorative corbels. The restoration of historic features can differentiate retailers in a competitive retail environment, providing authenticity and distinctiveness, bringing credibility to national and local place brands (Heritage Counts, 2016). External lighting should be kept to a minimum and may not be appropriate in sensitive areas.
- 8.54. The use of security shutters (especially if solid) can be visually unattractive and create a hostile appearance, which can reduce natural surveillance, encourage crime and ultimately affect the commercial viability of an area. There are other means of improving the security of shop fronts, such as the use of laminated glass, improved lighting, internal security grilles or natural surveillance, that have a less detrimental impact. Security shutters will therefore only be supported in exceptional circumstances where evidence supported by the police has shown that security poses a particular problem and it has been demonstrated that no alternative approach is suitable.
- 8.55. Adverts like shop fronts have an important role to play in making people aware of a business. By their very nature, adverts are conspicuous and prominently displayed. Individually and cumulatively, they can affect the character and appearance of buildings, townscapes, settlements, their setting and key views.
- 8.56. Advertisements should be of a number, design, size and material that complement the character of buildings they are on and the surrounding environment. Visual clutter and proposals that affect public safety should be avoided. In particularly sensitive locations (for instance within Conservation Areas), the design and materials will need to take into careful account the property or area's character and appearance. Compromises may need to be made to 'corporate' designs to meet the requirements of the policy; for example internally illuminated box fascias and projecting signs will not be generally appropriate in conservation areas.

Policy DH7: Heritage Assets

- 8.57. Surrey Heath's historic environment contributes to the Borough's character, sense of place and quality of life. The historic environment provides social and cultural benefits by creating a sense of familiarity and belonging, bringing communities together and connecting us to our shared past, in all its diversity. It can also play an important role in promoting economic prosperity by ensuring that an area offers an attractive and unique environment where people want to live and work.



- 8.58. The historic environment of Surrey Heath incorporates a distinct and diverse range of designated heritage assets. Within the Borough, these comprise over 180 statutory listed buildings, 2 registered parks and gardens in addition to 9 Conservation Areas and 4 Scheduled Monuments. The process of designation has identified them as having a level of significance that justifies protection under specific legislation.
- 8.59. The Borough also benefits from a range of different non-designated heritage and archaeological assets which can include buildings, structures, areas and archaeology considered by the Local Planning Authority to be of local significance for their historic or architectural interest. These non-designated heritage assets are included on a Local List and areas of archaeological importance are surveyed and mapped by Surrey County Council. The Council will work proactively with external and internal partners and the community to ensure the Local List is up to date. Funding has been agreed to work jointly with Surrey County Council and undertake a review of the Local List to update or amend those non-designated heritage assets currently on the list and to identify those assets that have yet to be included. This review of the Local List is anticipated to be completed in 2024.
- 8.60. Cumulatively, these heritage assets provide a distinctive identity that is unique to Surrey Heath. They make tangible the Borough's historical influences, such as the presence of the military, its arable past and the wider geographical importance of the Borough identified by the historic A30 London to Lands End coaching route which passes through Surrey Heath and close by the Bagshot Village Conservation Area.
- 8.61. In order to maintain a thriving historic environment, the National Planning Policy Framework requires Local Planning Authorities to set out a positive strategy for its conservation in their Local Plans. It takes account of the merits to sustain and enhance the significance of heritage assets and the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.
- 8.62. The Council will support proposals which conserve and where required enhance the historic environment of Surrey Heath. Appropriate consideration will be given to ensure that those significant elements of the historic environment which contribute to Surrey Heath's character and sense of place are recognised for the positive impact they have in the Borough. These are to include:
1. Conservation Areas and listed buildings across the Borough, including those with a reference to Surrey Heath's military past, and its historic coaching route.
 2. Camberley Town Centre and its locally important 19th and 20th Century buildings including the Grade II listed Obelisk.
 3. The range of its places of worship.
 4. Historic farm buildings and rural villages and hamlets.
 5. Historic Parks and Gardens including the Grade II listed Bagshot Park.



Policy DH7: Heritage Assets

- 1) Proposals for development that affects heritage assets (designated and non-designated) will be supported where they conserve and enhance the significance, special interest and character and appearance of the heritage asset and its setting.
- 2) Proposals that would affect a designated or non-designated heritage asset must be accompanied by a heritage impact statement proportionate to the importance of the heritage asset and the potential impact of the proposal.
- 3) Proposals which put heritage assets to viable uses consistent with their conservation will be supported, provided that the proposals are consistent with criterion 1) and 2).

Designated Heritage Assets

- 4) Development proposals affecting designated heritage assets (Listed Buildings, Scheduled Monuments, and Historic Parks and Gardens) or their setting will be supported where they preserve and/or enhance the special character, appearance and distinctiveness of Surrey Heath's historic environment in a manner appropriate to their historic significance.
- 5) Great weight and importance will be attributed to preserving the significance of a designated heritage asset, irrespective of the potential level of harm.
- 6) Proposals which would result in substantial harm to, or the complete loss of the significance of a designated heritage asset, or its setting, will not be approved unless:
 - a) the nature of the heritage asset prevents all reasonable uses of the site;
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 - c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and,
 - d) the harm or loss is outweighed by the substantial public benefit of bringing the site back into use.
- 7) Where the development proposal would result in less than substantial harm to the significance of the designated heritage asset or its setting, this harm must be weighed against the public benefit of the proposal including, where appropriate, securing its optimum viable use. Clear and extensive justification for the harm should be set out in full in the Heritage Impact Statement.
- 8) Where there is a clear and convincing justification for the loss or partial loss of a heritage asset the Council will seek public benefits by requiring developers to investigate and record the features affected and provide publicly accessible interpretation which is appropriate to the scale and level of interest of the heritage



Policy DH7: Heritage Assets

asset.

- 9) Development proposals that affect Historic Parks and Gardens will be assessed by reference to the scale of harm, both direct and indirect, or loss to and the significance of the park or garden.

Conservation Areas

- 10) In accordance with The Planning (Listed Building and Conservation Areas) Act 1990, the Council has a duty to pay special attention to the desirability of the preservation and enhancement of the character and appearance of conservation areas in the Borough.
- 11) When considering development proposals within or adjoining a conservation area, including the alteration, extension or change of use of a building, the Council will support proposals which preserve or enhance:
- a) existing architectural and historic character and associations by having regard to the positioning and grouping, form, scale, massing, detailing of development and the use of materials in its construction; and
 - b) areas of townscape quality; and
 - c) existing hard and soft landscaping features including areas of open space, trees, hedges, walls, fences, watercourses and surfacing and the special character created by them; and
 - d) the setting of the conservation area.
- 12) Proposals that would have a detrimental effect on such features will not be permitted. Built development will not be permitted on public and private open spaces within or adjacent to conservation areas where those spaces make a positive contribution to its character or setting, unless it can be demonstrated that the public benefit demonstrably outweighs the harm.

Archaeological Sites

- 13) The Council will support development proposals which do not adversely affect nationally significant features of archaeological or historic importance or their setting.
- 14) Where a development has the potential to affect heritage assets with archaeological interest, the applicant will be required to submit an appropriate desk-based assessment and where necessary the results of a field evaluation.
- 15) For scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equal significance to scheduled monuments, loss or substantial harm (through the removal of remains) should be wholly exceptional.



Policy DH7: Heritage Assets

16) Within Areas of High Archaeological Potential or County Sites of Archaeological Importance, as identified on the Policies Map, or outside of these areas on any major development site of 0.4ha or greater, applicants will be required to undertake prior assessment of the possible archaeological significance of the site and the implications of their proposals, and will be required to submit, as a minimum, a desk-based assessment to accompany any application. Where desk-based assessment suggests the likelihood of archaeological remains or is inconclusive of determining the archaeological potential of a site fully the Planning Authority will require the results of an archaeological evaluation in order to inform the determination of the application. Prospective developers should also refer to the Historic Environment Record to establish whether there is known or potential archaeological interest and the need for investigation and evaluation at an early stage.

Non-designated heritage assets

17) Planning permission will only be granted for development affecting a local heritage asset or its setting if it is demonstrated that due regard has been given to the impact on the assets significance and its setting and that it is demonstrated that the significance of the asset and its conservation has informed the design of the proposed development. In determining whether planning permission should be granted for a development proposal, which affects a local heritage asset, consideration will be given to the significance of the asset, the extent of impact on its significance, as well as the scale of any harm or loss to the asset as balanced against the public benefits that may result from the development proposals.

18) The re-use of vacant or underused locally listed buildings or other undesignated heritage assets will be supported where this contributes positively to their conservation either individually or as part of wider strategies for regeneration.

Buildings at Risk

19) The Council will take a proactive stance to any heritage assets that may be at risk. This will include working with property owners to find a use that will enable the building at risk to be put back in to use.

- 8.63. The NPPF (Annex 2) attributes significant weight to the term ‘setting’ in relation to heritage assets. It describes setting as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is also influenced by other environmental factors such as noise, vibration, smell and lighting from other nearby land uses.



- 8.64. For proposals affecting any designated or non-designated heritage asset or their setting, the Council expects applicants to describe the significance of any heritage asset affected. This should be set out within a Heritage Impact Statement. The level of detail should be proportionate to the assets' importance and should be sufficient to enable the Council to understand the potential impact of the proposal on their significance. In the preparation of such a statement, the heritage asset and impact of works should be assessed by an appropriate expert and reference should be made to the Historic Environment Record (HER) as a minimum.
- 8.65. Where a proposal would result in substantial harm to, or loss of a designated heritage asset, the Council will also expect the Heritage Statement to incorporate the following:
- Stage 1: Method of works informed by a condition survey and/or structural survey
 - Stage 2: Design Stages: Impact of proposal on significance
Alternative options assessed
 - Stage 3 Conclusion: Harm
Mitigation
Repairs specification
- 8.66. Where loss of a heritage asset, whether designated or non-designated, is unavoidable, the developer should mitigate this loss through record and through the dissemination of that knowledge. Results of assessments and investigations which are a requirement and collected as part of development management are of public interest and will be made accessible, normally through the Surrey Historic Environment Record. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. The dissemination of knowledge acquired can be produced as a published report, however it can be presented in other forms on site for community benefit e.g. presentation, engagement or public art.



- 8.67. There are many pressures on the historic environment, both in the urban areas and countryside. Inappropriate changes can have an irreversible impact on the historic character of an area whilst the historic aspects of buildings can be irrevocably lost through redesign, adaption and demolition. National Planning Practice Guidance supports this by setting out that heritage assets being put to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. The Council will encourage developers to propose viable alternatives in keeping with a heritage assets original use. Furthermore to ensure that proposals affecting heritage assets are protected against deliberate neglect or damage to a heritage asset, the NPPF states that where there is evidence of deliberate neglect or damage, the deteriorated state of the heritage asset should not be taken into account in any decision.

Listed Buildings

- 8.68. The NPPF states that substantial harm to, or the loss of nationally important assets of the highest significance should be wholly exceptional. Substantial harm to or loss of a Grade II designated heritage asset should be classed as exceptional, however where this asset is of military interest then the Council would determine this as wholly exceptional given the military significance within the Borough.
- 8.69. Less than substantial harm to a designated asset of military interest will be judged on a case-by-case basis, but the Council will only allow such harm in exceptional circumstances.

Historic Parks and Gardens

- 8.70. A register of parks and gardens of “Special Historic” interest is maintained by Historic England to encourage their protection and conservation but has no associated statutory controls. Two registered sites within the Borough are both Grade II listed, one is Crown owned (Bagshot Park) and the other is publicly owned (Frimley Park Gardens).

Conservation Areas

- 8.71. Each of the Borough’s Conservation Areas is supported by a Character Appraisal. As part of the Council’s positive strategy for the historic environment, it will undertake a program of review of the Conservation Area character appraisals and management plans for each conservation area including any proposed new or extended area, so that opportunities for beneficial change or the need for additional protection may be identified.
- 8.72. The Council will consider introducing Article 4 directions where a Conservation Area is identified ‘at risk’ when surveyed by the Local Authority in conjunction with Historic England.



Archaeological Sites

- 8.73. Archaeological remains are a finite and irreplaceable resource, the vast majority of which lack coverage by national designation regimes. Proposals for redevelopment which have the potential to affect archaeological remains will be required to assess, identify and better understand the significance of the remains prior to the submission of an application, and to make suitable provisions for their investigation, protection and/or further study should development proceed. The results of all archaeological investigations carried out within the Borough should be reported to the Surrey County Historic Environment Record, and material recovered deposited in a publicly-accessible repository where practicable.
- 8.74. The Council has identified the following areas of archaeological interest within the Borough:
1. **Scheduled Monuments:** A Scheduled Monument is a heritage asset of recognised National Significance that is legally protected under the terms and conditions of the 1979 Ancient Monuments and Archaeological Areas Act. Scheduled Monuments are designated by the Secretary of State for Culture Media and Sport - on the advice of Historic England - following a rigorous programme of assessment.
 2. **County Sites of Archaeological Importance:** A County Site of Archaeological Importance is a known archaeological heritage asset that is significant in either a National or Regional context and should be preserved. CSAIs are locally designated archaeological heritage assets recognized for their significance by the County and District Councils on the basis of information submitted to the Surrey Historic Environment Record.
 3. **Areas of High Archaeological Potential:** An Area of High Archaeological Potential is a defined area where it is strongly suspected that there is an increased likelihood of archaeological remains (finds or features) being revealed should ground disturbance take place. They have been selected on the basis of archaeological, historic or cartographic information contained within the Surrey Historic Environment Record and can include categories of site from isolated areas within the landscape where finds have been reported, through to known historic settlements such as town centres.



- 8.75. Surrey's archaeological resources are not all catalogued or reported, and it is known that large-scale ground disturbance has a heightened possibility of revealing archaeological remains which have not previously been recorded. In order to maintain a positive and proactive approach to the likelihood of encountering hitherto unknown archaeological heritage assets during development, and to ensure that such assets can have their significance assessed, the Council also requires that large-scale development proposals (here defined as those on sites over 0.4ha in size) examine the possibility that archaeological remains may be present through desk-based assessment and if necessary field evaluation, in line with the NPPF.

Local heritage assets

- 8.76. Surrey Heath Borough Council maintains a list of local heritage assets known as the Surrey Heath Local List. This list is a register of buildings, structures, features or places that make a particular contribution to the character and distinctiveness of Surrey Heath through their locally significant historic, archaeological or artistic interest.
- 8.77. Local heritage assets and their setting are often key to what makes a place special. They should be given consideration at the pre-application and design stage to ensure any adverse impacts are either avoided or mitigated and the local character is enhanced or preserved.
- 8.78. There are however, heritage assets within the Borough that are neither listed nor locally listed, either because their significance has only recently been revealed or has never been formally considered. Where the significance of a heritage asset is not properly understood, it's architectural, historical, archaeological or artistic interest is at greater risk of erosion or loss through alteration or change.
- 8.79. In order to lessen this impact, plans should set out a positive strategy for the conservation and enjoyment of the historic environment which can make a positive contribution to, or better reveal the significance of the heritage asset. Therefore, the Council propose a programme of assessment and review of the local list following funding to work jointly with Surrey County Council to achieve this, and will prepare a Heritage Strategy to identify groupings of heritage assets which contribute to the distinctiveness of the Borough.



Policy DH8: Building Emission Standards

- 8.80. The Government’s Net Zero Strategy: Build Back Greener (October 2021) makes a commitment to making the transition to low carbon buildings affordable and achievable for all. The Surrey Heath Climate Change Study (2020) identifies that residential buildings are the largest source of carbon emissions in the Borough. Drawing on the study’s findings, Policy SS3a identifies the need to deliver significant carbon emission reductions through the Local Plan. This Policy sets out the approach to building emission standards and embodied carbon (relates to the carbon footprint of a material, including those released throughout the supply chain) associated with construction waste management.

Policy DH8: Building Emission Standards

- 1) Planning permission will be granted for development which positively contributes to addressing climate change through low/zero carbon design that improves the energy efficiency of both new and existing buildings and provides low or zero carbon energy. Development proposals for residential buildings will be supported where they adopt the fabric first approach in line with the energy hierarchy to contribute significantly towards achieving carbon emission reductions in accordance with Policy SS3a.
- 2) Development proposals for non-residential buildings will be required to achieve final certification standards against the Building Research Establishment’s Environmental Assessment Method (BREEAM) and/or CEEQUAL (or equivalents) as indicated in the table below. Development proposals which exceed these ratings will be supported and encouraged.

Development Type	Scale	2021-2029	2030-2038
New and Refurbished Non-Residential	500-5,000m ²	BREEAM Very Good	BREEAM Excellent
	>5,000m ²	BREEAM Excellent	
Public realm	Major works	CEEQUAL Very Good	CEEQUAL Excellent

- 3) Major development proposals will be required to submit a Site Waste Management Plan (SWMP).
- 4) Applications for development, including refurbishment, conversion and extensions to existing buildings are required to set out in a Sustainability Statement how sustainable construction practices will be incorporated that demonstrates how recycling and reuse will be maximised and embodied carbon emissions minimised,



Policy DH8: Building Emission Standards

including (where applicable):

- a) the efficient use of mineral resources and the incorporation of a proportion of recycled and/or secondary aggregates
- b) waste minimisation and reusing material derived from excavation and demolition
- c) sourcing materials locally where possible
- d) taking into account the embodied carbon emissions of materials based on information provided in a respected materials rating database

- 8.81. Policy SS3a identifies a significant 'policy gap' in carbon emission reductions that needs to be addressed through the Local Plan.
- 8.82. Policy DH8 follows the energy hierarchy whereby the fabric of the building, followed by the heating/cooling of the building is given priority over the installation of renewable technology. This is commonly known as the 'fabric first' approach and is cited in the Government's Net Zero Strategy as being key to ensuring the transition to low carbon buildings. Following this method has multiple benefits: it is in accordance with the Government's 2017 Clean Growth Strategy; it ensures that inefficient buildings are not constructed with renewable energy technology bolted on; and it avoids the construction of homes that require retrofitting in the future.
- 8.83. Applications for development should include information setting out how sustainable design will be incorporated, including the use of landform, layout, building orientation, massing and landscaping to reduce energy consumption. Major development proposals should submit an energy statement detailing expected energy supply and demand, including:
- Space heating demand (kWh/m²/yr), to demonstrate a fabric first approach to reducing energy demand.
 - Total Energy Use Intensity (kWh/m²/yr) to demonstrate overall efficient design.
 - The average carbon content of the heat supplied (gCO₂/kWh).
 - A carbon balance calculation (on an annual basis) to quantify any gap in a net zero carbon balance if net zero is not achieved.



- 8.84. Adopting assessment frameworks can be a vital, resource-efficient way of delivering better quality and higher standard design that contributes to climate change mitigation and adaptation. The [BREEAM](#) assessment framework for non-residential buildings is well established. Adopting the framework is designed to drive standards through benchmarking and positive recognition of high quality design, supported by formal verification.
- 8.85. The HQM, BREEAM and CEEQUAL assessment frameworks adopt the UKAS (United Kingdom Accreditation Service) accredited certification process. All schemes provide a holistic set of criteria which not only support the delivery of an energy efficient, resilient built environment, but also help to mitigate unintended consequences (such as those related to temperature control) and drive healthier, better-managed places. BREEAM and CEEQUAL assessments are made on a 'Good' to 'Excellent' and then 'Outstanding' scale. All development proposals should aspire to deliver the best possible ratings against the adopted assessment frameworks where feasible.
- 8.86. There are a number of other sustainable design standards and methods that are available, covering a range of development types, including new homes. Where relevant, the voluntary use of quality assurance methods such as PassivHaus certification will be encouraged, as well as consideration of the UK Net Zero Carbon Buildings Standards.
- 8.87. The energy performance standards set by the Building Regulations deal with operational energy use (e.g. lighting, cooling, heating and hot water); however, a building's true energy performance is also a product of the 'embodied carbon' in building materials and emissions created during the construction process. Furthermore, demolition, refurbishment and retrofitting all create carbon emissions and the potential to minimise these emissions can be considered at the design and construction stages. Such emissions will comprise an increasing proportion of total emissions over a building lifecycle, as operational emissions decrease due to electrification combined with grid decarbonisation.
- 8.88. The Council recognises that efficient construction activities can maximise the potential to recycle materials and limit the production of unnecessary waste. For example, offcuts of wood can be separated and recycled, such as for reuse in kitchen worktops, limiting waste production and the related carbon emissions when such materials degrade. Reductions in the carbon emissions related to construction waste may be delivered through planning conditions.
- 8.89. Site Waste Management Plans should therefore include consideration for embodied carbon within new development and include actions to minimise construction carbon emission and maximise recycling and reuse of construction materials that are appropriate to the site's context.



Section 9: Surrey Heath Local Plan Monitoring and Implementation

Implementation

- 9.1. The policies and allocations in the Local Plan will largely be delivered through the Council's role as Local Planning Authority through the determination of planning applications.
- 9.2. The granting of planning permission for developments that comply with the policies in the Local Plan, and the requirements of any planning conditions or S106 planning obligations, will ensure that development is consistent with the overall Local Plan Vision and Objectives.
- 9.3. However, this process will be undertaken in partnership with others including developers and landowners and statutory consultees as well as other stakeholders. The Council as landowner will also have a role in implementing policies and allocations set out within the Local Plan.

Monitoring

- 9.4. It is essential that the policies in this Local Plan are monitored so that early action can be taken to overcome any barriers to the delivery of the Plan's Vision and Objectives.
- 9.5. Monitoring is also important to enable communities and interested parties to be aware of progress and ensure that the overall development plan strategy is being delivered. The Council is required under the Localism Act to produce an annual Authority Monitoring Report (AMR) which must include information on how a Local Authority is implementing their Local Development Scheme and how Local Plan policies are being delivered. Amongst other things, the AMR will show the number of homes and amount of employment and retail space that have been delivered on an annual basis.
- 9.6. Annual housing monitoring will also inform the production of an annual five year housing land supply paper and response to the Housing Delivery Test.
- 9.7. A Monitoring Framework is set out in the Monitoring Framework section below.
- 9.8. It should be noted that targets only apply where proposals require planning permission and therefore where the policies in the Local Plan are used. Some types of developments, for example, certain changes of use do not require planning permission and are therefore outside of the control of the planning process. In addition, monitoring will only apply to planning applications determined after the adoption of the Local Plan.



Review

- 9.9. Whilst the Council has a requirement to review the Local Plan every five years, annual monitoring will help to identify whether there is a need to review policies in advance of this period. Other factors might also require the Council to review the Local Plan including, significant changes to national planning policy, guidance or legislation, or if there are significant strategic cross boundary planning matters to be addressed across a wider geographic area.
- 9.10. At the time of preparing this Local Plan the Government is proposing changes to the local plan process through the Levelling Up and Regeneration Act. Detailed consultations on the implementation of these reforms include changes to the content of local plans, to the evidence base and to monitoring requirements as well as to the process for Plan preparation. These changes will not affect the preparation of this Local Plan but future national planning policy or legislative changes may result in the need to update the monitoring indicators set out in the Monitoring Framework section of the Local Plan.



Monitoring Framework

Objective A

To deliver sustainable development that contributes to meeting housing needs, providing new homes of an appropriate housing mix and tenure, including provision of affordable and specialist housing needs.

Key Delivery Policies
SSI, HA1, HA2, HA3, HA4, H5, H6, H7, H8, H9, H10, H11

Table 9 – Objective A

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
A1	Net additional dwelling completions.	Annual target – average of at least 280 dpa up until 2032 and thereafter 321 dpa until 2038 and in line with current trajectory. Plan target – delivery of at least 5,578 dwellings.	Landowners, Developers, Registered Providers	Planning completions / Appeals monitoring
A2	Five/four year supply.	Annual target – provision of 5 or 4 year housing land supply.	Landowners, Developers, Registered Providers	Planning completions / Appeals monitoring
A3	Net affordable housing completions.	Annual and Plan target –qualifying schemes deliver policy compliant levels of affordable housing.	Landowners, Developers, Registered Providers	Planning completions / Appeals monitoring



Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
A4	Net increase in Gypsy and Traveller Pitches and Travelling Showpeople plots.	Plan target – 35 Gypsy and Traveller pitches and 14 Travelling Showpeople plots.	Landowners, Developers, Surrey County Council.	Planning completions / Appeals monitoring
A5	Specialist housing delivered.	Annual and Plan target – in line with site allocations and all other proposals consistent with the requirements of Policy H6.	Landowners, Developers, Surrey County Council, Registered Providers	Planning completions / Appeals monitoring
A6	Number of self-build plots.	Plan target – in line with Policies H5 and the 2023 HNA or any subsequent update.	Landowners, Developers	Planning permissions / Planning Completions / Appeals Monitoring
A7	Availability of SANG.	Plan target – sufficient to meet number of new homes set out in Policy SSI.	Joint Strategic Partnership Board, Hart District Council, Bracknell Forreest Council	Planning applications, SANG monitoring



Objective B

To 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.

Key Delivery Policies
SSI, ER1, ER2, ER3, ER4

Table 10 – Objective B

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
B1	Total amount of additional class employment floorspace by type and location, within and outside designated employment sites.	Annual and; Plan target: Increase in employment floorspace, towards residual need forecast of between 16,000 to 43,000 sqm, over 2019 base.	Landowners, Developers, Businesses	Planning applications, appeals monitoring
B2	Number of employee jobs in the Borough.	Annual and Plan target: Increase on 2019 base (55,000 jobs in 2019 according to Nomis).	Landowners, Developers, Businesses	Published data e.g. ONS Business Register, Employment Survey (BRES) and Nomis



Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
B3	Availability of accommodation for new small/micro businesses.	Annual and Plan target: No net loss in units of less than 1000sqm, on 2019 base (number of vacant properties under 1,000sqm as informed by Council's Business Rates Team).	Landowners, Developers, Businesses	Planning applications, appeals monitoring, published data e.g. ONS Business Register, Employment Survey (BRES) and Nomis
B4	Number of small/micro businesses	Annual and Plan target: Increase in micro/small businesses over 2019 base (4,585 micro and small businesses in 2019 according to Nomis).	Businesses	ONS Business Register and Nomis



Objective C

To enhance the vitality and viability of Camberley Town Centre and the other District and Local centres within the Borough.

Key Delivery Policies
CTC1, CTC2, CTC4, ER8, ER9, ER10

Table 11 – Objective C

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
C1	Total amount (net) of ground floor floorspace for town centre uses in defined town, district and local centres.	Annual and plan target – no net loss.	Surrey Heath Borough Council (as landowner), Developers, Landowners	Planning application, Appeal monitoring, Annual centre surveys
C2	Percentage of units with an active frontage in defined Primary Shopping Areas in town, district and local centres.	Plan and Annual target – where planning permission is required, no net loss of active frontage against 2019 baseline.	Surrey Heath Borough Council (as landowner), Developers, Landowners	Planning application, Appeal monitoring, Annual centre surveys



Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
C3	Percentage of vacant units in defined town, district and local centres.	Annual and Plan – District and Local Centres, no increase in % of vacant units (over rolling 3 year period). Camberley Town Centre Annual and Plan target – vacancy rates to be in line with the South East average.	Surrey Heath Borough Council (as landowner), Developers, Landowners	Planning application, Appeal monitoring, Annual centre surveys



Objective D

To ensure that development within the Borough is supported by the necessary physical, social and green infrastructure to meet the needs of Surrey Heath residents.

Key Delivery Policies
INI, IN2, IN3, IN4, IN5

Table 12 – Objective D

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
D1	Delivery of appropriate infrastructure to support development.	Annual and Plan target – infrastructure delivered in line with policies and planning permissions on allocated sites and in line with the IDP.	Surrey County Council, National Highways, Infrastructure providers, Landowners, Developers	Applications and appeals monitoring, Liaison with infrastructure providers.
D2	Loss of open space and community facilities.	Annual and Plan target – no net loss unless consistent with Local Plan policies.	Surrey County Council, Infrastructure providers, Landowners, Developers	Applications and appeals monitoring, Liaison with infrastructure providers.
D3	Loss of Green Space	Annual and Plan target – no net loss unless consistent with Local Plan policies.	Surrey County Council, Infrastructure providers, Landowners, Developers	Applications and appeals monitoring, Liaison with infrastructure providers.



Objective E

To 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.

Key Delivery Policies
E1, E2, E3, E7, DH5

Table 13 – Objective E

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
E1	Change in area of biodiversity importance as set out in Policy E2.	Annual and Plan target – No net loss of land area of all designated sites.	Surrey Nature Partnership, Surrey County Council, Developers, Landowners, Natural England	Planning applications, Periodic surveys
E2	Condition status of SPA/SSSIs.	Annual and Plan target – improvements bringing SSSIs into favourable condition, in line with targets in Local Nature Recovery Strategy.	Surrey Nature Partnership, Surrey County Council, Landowners, Natural England	Periodic site surveys.



Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
E3	Condition status of SNCIs.	Annual and Plan target – improvement in condition status and increase in the proportion with management plans in place.	Surrey Nature Partnership, Surrey County Council, Landowners, Natural England	Periodic surveys of sites and landowners Data return to Defra for National Indicator 160 (Proportion of Local Sites in positive conservation management)
E4	Biodiversity Net Gain.	Annual and Plan target: all qualifying development obligated to achieving at least 20% biodiversity net gain.	Surrey Nature Partnership, Surrey County Council, Developers, Landowners, Natural England	Planning applications, discharge of condition applications.



Objective F

To ensure that new development minimises or mitigates the impact of development on air quality, noise, light pollution, odours, emissions and particulates.

Key Delivery Policies
E4

Table 14 – Objective F

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
FI	Air pollution.	Annual and Plan target – Number of Air Quality Management Areas, no increase.	Surrey County Council, Natural England, affected neighbouring Local Authorities	The Council will work with partners to consider the best way to monitor changes in air quality and nitrogen deposition on European Sites.



Objective G

To ensure that new development, unless appropriate development under the Exceptions Test, is not located in areas of high or medium risk of flooding and that development does not increase surface water run-off.

Key Delivery Policies
E6

Table 15 – Objective G

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
G1	Number of planning permissions granted contrary to Environment Agency advice on flooding and water grounds.	Annual and Plan target – 0% of applications.	Surrey County Council, Developers, Landowners, Environment Agency	Planning applications, appeals monitoring
G2	Number of developments completed with SUDs measures implemented.	Annual and Plan target – 100% of qualifying developments.	Surrey County Council, Developers, Landowners, Environment Agency	Planning applications, appeals monitoring



Objective H

To 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 to the impacts of climate change.

Key Delivery Policies
SS3a, SS3b, DH4, DH8, E5

Table 16 – Objective H

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
H1	Provision of renewable energy	Annual and Plan target – 100% of qualifying applications providing a minimum of 25% of the development's regulated operational energy needs on-site.	Landowners, Developers	Planning applications, appeals monitoring
H2	Low and zero carbon decentralised energy networks.	Plan period – Increase in number.	Landowners, Developers	Planning applications, appeals monitoring, national statistics, Building Regulation final certificates



Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
H3	Average energy consumption/carbon emissions per person.	Annual and Plan target – 100% of major applications providing an energy statement that details expected supply and demand.	Landowners, Developers	Planning applications, appeals monitoring, national statistics, Building Regulation final certificates
H4	Provision of Site Waste Management Plans	Annual and Plan target – all approved major applications provide a Site Waste Management Plan.	Landowners, Developers	Planning applications, appeals monitoring, national statistics, Building Regulation final certificates



Objective I

To protect the character and purpose of the Green Belt and the character of the Countryside beyond the Green Belt.

Key Delivery Policies
GBC1, GBC2, GBC3, GBC4, GBC5

Table 17 – Objective I

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
11	Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified.	Annual and Plan targets – 0% of applications.	Developers, Landowners	Planning application, appeal monitoring
12	Number of planning decisions, including appeals, granting permission for development in the countryside that are not in accordance with policy.	Annual and Plan targets – 0% of applications.	Developers, Landowners	Planning application, appeal monitoring



Objective J

To conserve and enhance the Borough's built environment and heritage assets, both designated and non-designated.

Key Delivery Policies
DHI, DH6, DH7

Table 18 – Objective J

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
J1	Number of Local Heritage Assets.	Annual and Plan target - No loss of local heritage assets.	Surrey County Council, Developers, Landowners, Historic England	Historic England records, Surrey County Council Local Heritage Assets List
J2	Number and quality of statutory designated heritage assets.	Annual and Plan target - No loss of designated heritage assets. No increase in number of Grade I or II* Listed Buildings, Scheduled Monuments or Conservation Areas identified as at risk.	Surrey County Council, Developers, Landowners, Historic England	Historic England records



Objective K

To promote healthy, sustainable, and cohesive local communities through good design, and access to homes, employment, community and recreational facilities.

Key Delivery Policies
DHI, DH2, DH3, IN4, IN7

Table 19 – Objective K

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
K1	Recreational facilities lost to other uses.	Annual and Plan target – No net loss unless consistent with Local Plan policies.	Developers, Landowners	Planning applications, appeals monitoring
K2	Percentage of dwellings on previously developed land.	Plan target – achieve 60% of all new and converted dwellings on previously developed land within the Plan period.	Developers, Landowners	Planning applications, appeals monitoring
K3	Making effective use of land.	Annual and Plan target – density of schemes permitted in line with Policy DH2 and Housing Allocations.	Developers, Landowners	Planning applications, appeals monitoring



Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
K4	Delivering good space standards.	Annual and Plan targets - 100% new homes meet the Nationally Described Space Standards	Developers, Landowners	Planning applications, appeals monitoring



Objective L

To support measures that prioritise active and sustainable travel modes including improved facilities for pedestrians and cyclists and improvements to public transport.

Key Delivery Policies
CTC3, IN1, IN2

Table 20 – Objective L

Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
L1	Percentage of developments supported by a Travel Plan.	Annual and Plan target –100% of qualifying developments.	Landowners, Developers, Surrey County Council, National Highways	Planning applications, appeal monitoring, Infrastructure Funding Statement
L2	Provision of additional cycle route infrastructure.	Over a rolling 5-year period, an increase in length of cycle route.	Landowners, Developers, Surrey County Council, National Highways	Planning applications, appeal monitoring, Infrastructure Funding Statement
L3	Use of sustainable travel modes.	Plan target – Increase in travel to work Modal share by sustainable travel modes in 2031 Census over 2021 Census baseline .	Landowners, Developers, Surrey County Council, National Highways	Census 2021 and 2031.



Reference	Indicator	Annual Target / Plan Period Target (2038)	Delivery Partners	Data Source
L4	Transport Infrastructure associated with new development.	Plan and Annual target – delivery in line with planning obligations for major planning applications and Infrastructure Delivery Plan.	Landowners, Developers, Surrey County Council, National Highways	Planning applications, appeal monitoring, Infrastructure Funding Statement



Appendix I: Glossary

Table 21: Glossary

Abbreviation	Term	Explanation
	Active Frontage	Brings interest, life and vitality to the public realm. Active frontages should have doors and unobstructed-glass shop frontage which allows active visual engagement between inside and outside the building (i.e. internal uses and activity are visible from the outside).
	Active Town Centre Use	A use that generates footfall by attracting visiting members of the public and which provides an active frontage.
AQMA	Air Quality Management Area	An area designated by the Borough Council where air quality objectives are not being met or are likely to be at risk of not being met, and where people are likely to be regularly present.
	Allocated Site	A site identified in the Local Plan as being appropriate for a specific land use or land uses in advance of any planning permission.
	Amenity	The pleasant or normally satisfactory aspects of a location which contribute to its overall character and the enjoyment of residents or visitors. Amenity is often a material consideration in planning decisions. For buildings and spaces of historic value, Historic England describes the amenity value as being “Pleasant circumstances or features, advantages”.
AAP	Area Action Plan	A Development Plan Document for a specific area, such as the Camberley Town Centre AAP.



Abbreviation	Term	Explanation
	Affordable Housing	A definition of affordable housing can be found at Annex 2 of the NPPF Glossary. In addition, affordable housing includes First Homes as set out in the affordable housing update Written Ministerial Statement (May 2021) and set out in Planning Practice Guidance.
	Appropriate Assessment (Also known as Habitats Regulations Assessment)	If a proposed plan or project is considered likely to have a significant effect on a protected habitats site as defined in Annex 2 of the NPPF 2023, (either individually or in combination with other plans or projects) then an appropriate assessment of the implications for the site, in view of the site's conservation objectives, must be undertaken (Part 6 of the Conservation of Habitats and Species Regulations 2017 (or as amended)). This does not apply to plans or projects directly connected to the conservation management of the features for which the site was designated.
	Article 4 direction	A direction which withdraws automatic planning permission granted by the General Permitted Development Order. An Article 4 Direction can either remove all or specific General Permitted Development rights
AMR	Authority Monitoring Report	An annual report produced by the Council in accordance with the Localism Act 2011 which includes an update of how Local Plan policies are being delivered.
	Biodiversity	The existence of a wide variety of plant and/or animal species.



Abbreviation	Term	Explanation
BOA	Biodiversity Opportunity Area	Areas identified for the targeting of conservation land management activities, to make areas which are already good for biodiversity to become more connected to each other by creating more wildlife-rich areas and corridors.
BNG	Biodiversity Net Gain	Approach to development that seeks to leave the environment in a measurably better state than beforehand, using a standardised method for quantifying biodiversity which is based on the type and area of habitats present at a site level
	Building Regulations	Ensures that the policies set out in legislation regarding building standards are carried out. Building Regulations approval is required for most building work in the UK.
BREEAM	Building Research Establishment Environmental Assessment Method	A method for assessing, rating and certifying the sustainability of buildings.
	Carbon sequestration	Can be defined as actions required for the long-term storage of carbon dioxide or other forms of carbon to either mitigate or defer global warming and avoid dangerous climate change.
	Climate Change Adaptation	Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.



Abbreviation	Term	Explanation
	Climate Change Mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions. Mitigation can mean using new technologies and renewable energies, making older equipment more energy efficient, or changing management practices or consumer behaviour.
	Community Facilities	Includes, but is not limited to, facilities such as community centres and other community meeting places, healthcare facilities, education facilities, childcare facilities, public houses, the voluntary sector, public service providers, places of worship and cultural facilities including theatres and arts centres.
CIL	Community Infrastructure Levy	A levy that local authorities can choose to charge on new developments in their area to fund infrastructure.
	Conservation Area	Areas of special architectural or historic interest which are designated to offer greater protection to the built and natural environment.
	Core Strategy Development Plan Document	It is a strategic planning document containing the Council's long-term vision for the Borough, and policies to guide and manage development in Surrey Heath until 2028. The Core Strategy is replaced by this Local Plan.
	Council Strategy	The Council's Strategy sets out the approach to challenges, opportunities and priorities in the Borough. The Strategy forms the basis for the Council's Annual Plan.



Abbreviation	Term	Explanation
	Cultural Facilities	A development which is available to the public for the purpose of assembly, instruction, cultural, or community activities. These facilities promote historic, educational, cultural, or popular interests, such as theatres, museums, galleries and cinemas.
DPD	Development Plan Document	The Town and Country Planning (Local Planning) (England) Regulations 2012 refers to these as the Local Plan. It is the main planning policy document produced by the Council and forms the statutory development plan for the area.
	Density	Housing density is represented by the number of dwellings per hectare (dph). Net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping, and children's play areas, where these are provided.
	District Centre	A District Centre is a group of retail shops, together with appropriate supporting non-retail town centre uses that support a wider than neighbourhood area.
	Duty to Co-operate	A legal duty on local planning authorities to engage constructively, actively and on an ongoing basis with prescribed bodies to maximise the effectiveness of local plan preparation in the context of strategic cross-boundary matters



Abbreviation	Term	Explanation
ELR	Employment Land Review	An assessment of the anticipated land needed for business uses which fall within Employment uses, over the local plan period, taking account of local economic priorities and the context of the Functional Economic Area.
	Employment Uses	Employment Use Classes comprising uses within Classes B2, B8 and E (g), which cover Industrial, Storage or distribution and Office uses. Sui Generis uses may be considered to comprise Employment Uses on a case-by-case basis.
LEP	Enterprise M3 Local Enterprise Partnership	LEPs were partnerships between local authorities and businesses to determine local economic priorities and undertake activities to drive economic growth and the creation of local jobs. The borough was part of the Enterprise M3 LEP, but functions have now transitioned to local authorities.
	Evidence Base	Information gathered by a local planning authority to support a local plan and other development plan documents.
	Extra Care Housing	For people whose disabilities, frailty or health needs make ordinary housing unsuitable but who do not need or want to move to long-term care (residential or nursing homes). It is used to describe a range of developments that comprise self-contained homes which have been designed, built or adapted to facilitate the care and support needs that its owners/tenants may have now or in the future, with access to care and support 24 hours a day, either on site or by call. It is also known as 'assisted living'.



Abbreviation	Term	Explanation
	Flood Zones	Flood Zones refer to the probability of river flooding. They are shown on the Environment Agency's Flood Map and within the Council's Strategic Flood Risk Assessment (SFRA) which defines the Borough's flood maps. Flood Zone 1 is low probability; Flood Zone 2 is medium probability; Flood Zone 3a is high probability and Flood Zone 3b is functional flood plain where land has to be stored or flows at times of flooding.
FEA	Functional Economic Area	Considers the geographical extent of the local economy and its key markets.
	Geodiversity	The range of rocks, minerals, fossils, soils and landforms that make up a particular landscape.
	Green Belt	A designation for land around certain Cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped.
	Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities
	Government's standardised methodology	An approach set out by Government to determine the local housing needs of an area.
	Gypsies and Travellers	Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.



Abbreviation	Term	Explanation
GTAA	Gypsy and Traveller Accommodation Assessment	An assessment of need in respect of the Gypsy and Traveller and Travelling Showpeople communities.
	Gypsy and Traveller Pitch	The space required to accommodate one Gypsy and Traveller household, including space for their caravans, car parking and an amenity building.
HIA	Health Impact Assessment	A combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.
	Heritage Asset	Parts of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest. They include designated heritage assets (such as listed buildings and conservation areas) and assets identified by the local planning authority during the process of decision-making or through the plan-making process.
HMA	Housing Market Area	The general area within which people most often move home. These typically cover the administrative areas of multiple councils.
	Infrastructure	The set of services and facilities necessary for a development to function. Infrastructure includes transport, education, leisure and health facilities, as well as open space and utilities, such as water and sewerage.



Abbreviation	Term	Explanation
	Infrastructure Funding Statement	An annual statement setting out the infrastructure projects or types of infrastructure that have been, and are intended to be funded, either wholly or in part by the Community Infrastructure Levy or planning obligations.
	Infrastructure Needs Assessment	Sets out the baseline of infrastructure in the Borough and forms the first part of developing an infrastructure needs study.
	Intermediate Housing	Homes for sale and rent provided at a cost above social rent but below market levels. They can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing.
	Irreplaceable habitat	Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Examples in the borough are ancient woodland, ancient and veteran trees and lowland fen. Government intends to review this definition in 2024.
	Listed Building	Buildings which are identified as having special architectural or historic importance and so are protected from demolition or inappropriate alteration or development by legislation and by planning policies. Protection also applies to certain other structures within the curtilage of Listed Buildings. The categories of listed buildings are: · Grade I - buildings of exceptional interest, Grade II* - buildings of more than special interest, Grade II – buildings of special interest.



Abbreviation	Term	Explanation
	Local Centre	A local centre offers a smaller range of facilities than those present in a District Centre. They play an important role in meeting the day-to-day shopping needs for communities.
LDS	Local Development Scheme	The LDS sets out Surrey Heath Borough Council's programme for preparing future planning documents. It outlines what documents the Council will be working on and a timetable for the production of these documents.
LNRS	Local Nature Recovery Strategy	A plan to halt and reverse local biodiversity losses, by restoring and reconnecting priority habitats and species at a landscape scale. The strategy will supersede Biodiversity Opportunity Areas.
LNR	Local Nature Reserve	Sites designated for public engagement, education and enjoyment of the wildlife (or geological) features of a site.
	Local Plan	A Local Plan document sets out the policies and site allocations which will form the basis for future land use planning and be used to determine planning applications. These documents are statutory documents accorded legal status under the Planning and Compulsory Purchase Act 2004, as amended.
	Locally Important Employment Site	A site that is recognised for the important role it plays in servicing the local economy. Such sites are generally smaller employment sites that provide locations to support local businesses.



Abbreviation	Term	Explanation
LTP	Local Transport Plan	A statutory document prepared by Surrey County Council to set out key transport issues across the County and to establish a series of objectives to address them, including a programme for achieving them.
	Low-carbon energy	This is energy that makes more efficient use of fossil fuels. An example of this would be a gas-powered combined heat and power unit. As well as using the energy generated, it also harnesses the heat to achieve an overall reduction in energy usage.
	Market Housing	Private housing for rent or for sale, where the price is set in the open market.
NNR	National Nature Reserve	Areas designated by Natural England, which aim to protect, and provide public access to, nationally significant wildlife-rich areas.
NPPF	National Planning Policy Framework	The NPPF sets out the Government's planning policies for England and how these are expected to be applied at the local level. Local Planning Authorities must take the content into account in preparing Local Plans and in decision making.
	Neighbourhood Parade	A small-scale mix of retail and service uses to provide for the needs of the local community.
	Neighbourhood Forums	Neighbourhood Forums comprise of an Organisation or group empowered to lead the neighbourhood planning process where a neighbourhood area is unparished. The Organisation or group must apply to the local planning authority for its formal designation.



Abbreviation	Term	Explanation
	Neighbourhood Planning	Neighbourhood planning gives local communities greater power to shape development by having a direct role in the development of planning policies at a local level. Neighbourhood planning can be undertaken by Parish Councils or Neighbourhood Forums
	Open Space	Land that is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value as well as opportunities for sport and recreation.
	Permitted Development Rights	Permitted Development Rights are a national grant of planning permission, enabled by the Town and Country Planning (General Permitted Development) (England) Order 2015 (and subsequent updates), which allow certain building works and changes of use to be carried out without having to make a planning application. They are subject to conditions and limitations.
	Planning Obligation	A legal agreement entered into under Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
PPG	Planning Practice Guidance	The PPG contains guidance to supplement the NPPF. It was first published March 2014, and is regularly updated.
	Policies Map	A map of the Borough showing the Local Plan's proposals and where policies apply.



Abbreviation	Term	Explanation
	Pollution	The introduction of contaminants into the environment that cause adverse change. Pollution can take the form of chemical substances or energy, such as noise, heat or light.
	Previously Developed Land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. The NPPF also provides a list of exclusions for land that is considered not to fall in the category of being previously developed.
	Primary Shopping Area	An area where retail development is concentrated.
	Priority Habitat	Habitats identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP). Examples of priority habitats found in Surrey Heath include lowland dry heath, acid grassland, fen, deciduous woodland, wet woodland, hedgerow and traditional orchards.
	Priority species	Species of plants, animals and fungi which have been identified as threatened and therefore a priority for conservation action under the UK Biodiversity Action Plan (UK BAP). Hedgehogs and many others are included.



Abbreviation	Term	Explanation
	Protected species	Species of animals and plants which are protected in law. For European Protected Species, it is illegal to kill, injure, disturb place of shelter (such as a pond, tree or hedgerow used by these species), take and/or and sell these species. Examples of European Protected Species found in Surrey include Great crested newts and various species of bats. The Wildlife and Countryside Act protects other species including Common lizards and Slow-worms, along with certain rare plants and fungi. Badgers are protected by specific legislation.
	Renewable Energy	Energy from natural resources that can be naturally replenished, such as sunlight, wind or rain. Examples of renewable energy technologies include wind turbines and photovoltaics.
	Rural Exception Housing Site	Small sites used for affordable housing in perpetuity where sites would not normally be used for housing.
	Section 106 Agreement	An agreement under Section 106 of the Town and County Planning Act which contains legally enforceable obligations to mitigate the impact of development proposals.
	Self-Build and Custom Housebuilding Register	The Self-Build and Custom Housebuilding Act 2015 places a duty on local councils in England to keep and have regard to a register of people who are interested in self-build or custom-build projects in their area.



Abbreviation	Term	Explanation
	Self-build/Custom Build	Self-Build refers to projects where an individual or an association of individuals directly organises the design and construction of new homes. Custom build refers to projects where an individual or an association of individuals work with a specialist developer to deliver new homes.
	Settlement Boundary	The boundary set in a Local Plan around settlements in the Borough.
SNCI	Site of Nature Conservation Importance	Sites of Nature Conservation Importance (SNCIs) are a series of non-statutory local sites designated to seek to ensure, in the public interest, the conservation, maintenance and enhancement of species and habitats of substantive nature conservation value.
S.S.S.I	Sites of Special Scientific Interest	Areas of special interest by reason of their flora, fauna, geological or physiological features. They are protected under the Wildlife and Countryside Act.
	Small and Medium-Sized Enterprise	A small business, which has no single definition. It can be based on the number of employees, turnover, balance sheet information or audit threshold. Some definitions are based on a maximum of 250 employees.
SAC	Special Areas of Conservation	Strictly protected sites defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protections as important conservation sites.
	Specialist Housing	Housing specifically designed to meet the identified needs of older people, people with disabilities and vulnerable people with support needs. It can include extra care housing.



Abbreviation	Term	Explanation
	Step-up Town	The Enterprise M3 Local Enterprise Partnership (LEP) sets out that a Step-up Town is one that with the right investment, has the potential to contribute more to the economy.
SCI	Statement of Community Involvement	The Statement of Community Involvement (SCI) sets out the Council's approach for involving the community in the preparation and revision of local plan documents and planning applications.
	Strategic Employment Area	Areas which contain sites that are considered to fulfil a strategic economic function within the Functional Economic Area (FEA).
SEA	Strategic Environmental Assessment	Strategic Environmental Assessment (SEA) is the process by which environmental considerations are required to be fully integrated into the preparation of plans and programmes. In plan making it is usually incorporated into the Sustainability Appraisal document.
SFRA	Strategic Flood Risk Assessment	A study that provides information on the probability of flooding from all sources, such as that from rivers, surface water, groundwater and sewers.
SLAA	Strategic Land Availability Assessment	The SLAA identifies parcels of land promoted for development and assesses their suitability, availability and deliverability for residential, economic and other uses to meet Surrey Heath's needs over a 15 year period.
SRN	Strategic Road Network	The road network of trunk roads and motorways managed by National Highways.



Abbreviation	Term	Explanation
SANG	Suitable Alternative Natural Greenspace	SANGs are areas that currently are not in use for recreation and so are a new alternative provision or are existing areas that are significantly under-used and so have the capacity to absorb additional recreational use. SANGs are a central element of the Council's Avoidance and Mitigation Strategy for the protection of the Thames Basin Heaths SPA.
SPD	Supplementary Planning Document	These are documents produced by the Council that provide further information and additional detail to the policies within the Local Plan.
SA/SEA	Sustainability Appraisal incorporating a Strategic Environmental Assessment	A Sustainability Appraisal (SA) is a tool used to appraise planning policy documents in order to promote sustainable development. Social, environmental and economic aspects are all taken into consideration. Sustainability Appraisal (SA) is a compulsory requirement under the 2004 Planning and Compulsory Purchase Act
	Sustainable Development	There is no definitive or legal definition of sustainable development. The Brundtland Commission (1987), formerly the World Commission on Environment and Development, defines sustainable development as ' <i>development that meets the needs of the present without compromising the ability of future generations to meet their own needs</i> '.
SuDS	Sustainable Drainage System	The term Sustainable Drainage Systems covers the range of drainage elements for managing surface water in a way which is more sympathetic to the natural and human environment than conventional below-ground drainage systems.



Abbreviation	Term	Explanation
	Sustainable Transport Modes	Any efficient, safe and accessible means of transport with overall low impact on the environment, such as walking, cycling, and using public transport.
	Tenure	Housing tenure describes the status under which people occupy their accommodation.
SPA	Thames Basin Heaths Special Protection Area	A European designated site which has been identified as being of international importance for the breeding, feeding, wintering or migration of rare and vulnerable species of birds. The Thames Basin Heaths SPA includes areas of heathland across Surrey, Hampshire and Berkshire.
	Town Centre	Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.
TA	Transport Assessment	A study of the patterns of movement around the Borough by all modes of transport. A transport assessment can also set out transport issues relating to a proposed development, identifying measures required to improve accessibility and safety for all modes of travel. The study tests the impacts of Local Plan development on the transport infrastructure in the Borough, including a defined highway network. It forms part of the evidence base for the Local Plan.

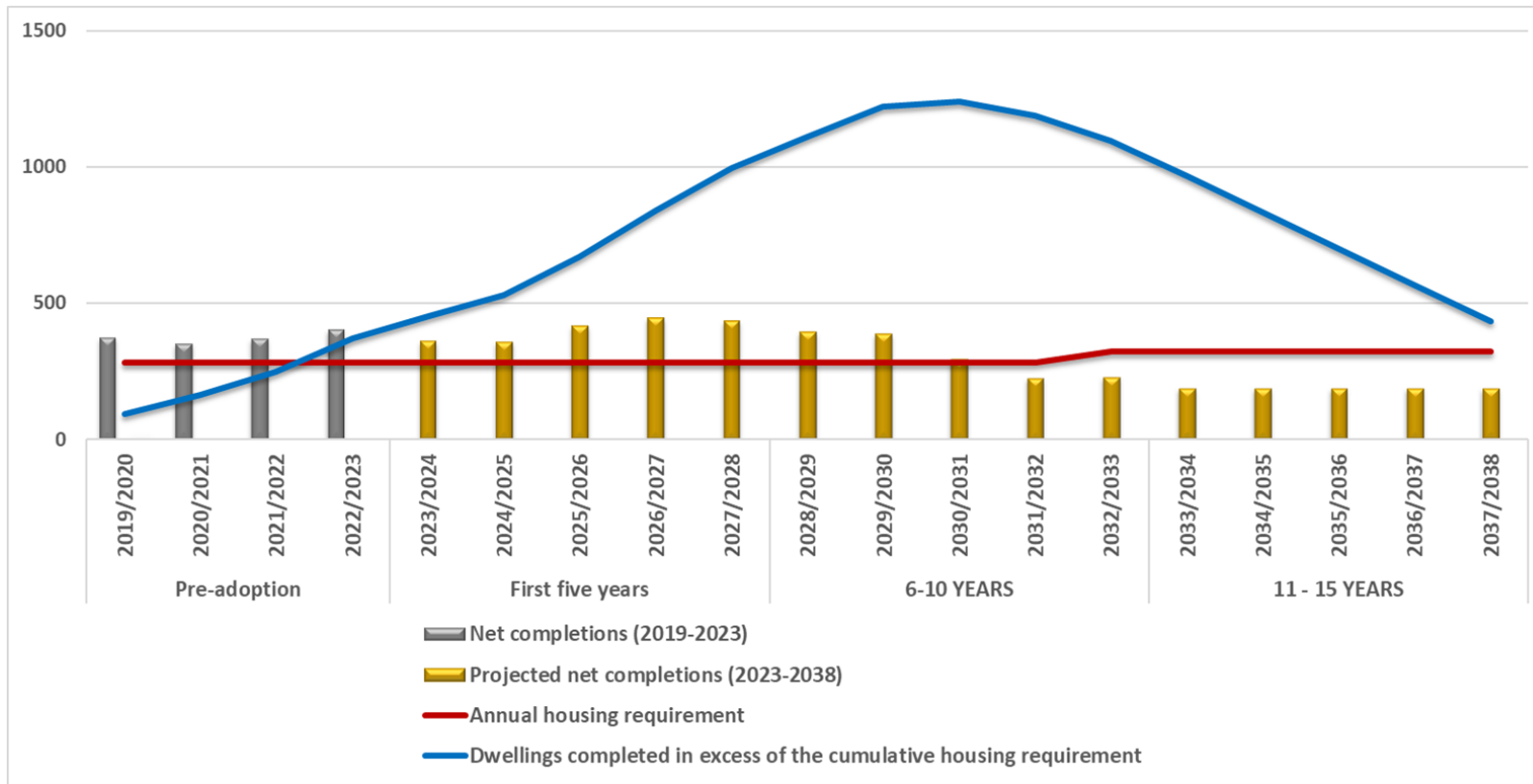


Abbreviation	Term	Explanation
	Travelling Showpeople	Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.
	Travelling Showpeople Plot	A piece of land of unspecified size which accommodates Travelling Showpeople's caravans, trailers, mobile homes and sometimes equipment.
	Viability Assessment	A financial appraisal of the profit or loss arising from a proposed development, taking into account the estimated value of a scheme when completed and the building cost and other development costs incurred in delivering a scheme. A Viability Assessment can also relate to the viability of a set of policies and form part of the local plan evidence base.
	Vitality	An overall measure of the health of a town centre.
WCS	Water Cycle Study	Identifies any constraints on planned housing growth that may be imposed by the water cycle and identifies how these might be resolved. It also provides a strategic approach to the management and use of water which ensures that the sustainability of the water environment is not compromised.
	Windfall Sites	Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.



Appendix 2: Housing Trajectory

Figure 11 – Housing Trajectory Graph



Page 309



Appendix 3: Strategic Policies for the Purpose of Neighbourhood Plans

Neighbourhood plans in the Borough must be in general conformity with the strategic policies of the Surrey Heath Local Plan as listed below:

Spatial Strategy

- SS1 Spatial Strategy
- SS2 Presumption in Favour of Sustainable Development
- SS3a Climate Change Mitigation
- SS3b Climate Change Adaptation

Housing

- HA1 Housing Allocations
- HA2 London Road Block
- HA3 Land East of Knoll Road
- HA4 Mindenhurst, Deepcut
- H5 Range and Mix of Housing
- H6 Specialist Housing
- H7 Affordable Housing
- H9 Rural Exception sites
- H10 First Homes Exception Sites
- H11 Gypsies and Travellers and Travelling Showpeople
- H11A Gypsy and Traveller Site Allocations

Economy and Town Centre Uses

- CTC1 Camberley Town Centre
- ER1 Economic Growth and Investment
- ER2 Strategic Employment Sites
- ER3 Locally Important Employment Sites
- ER7 Edge of Centre and Out of Centre Proposals

Infrastructure

- IN1 Infrastructure Delivery
- IN2 Transportation
- IN4 Community Facilities



- IN5 Green Infrastructure
- IN6 Green Space
- IN7 Indoor and Built Sport and Recreational facilities

Environment

- E1 Thames Basin Heaths SPA
- E2 Biodiversity and Geodiversity
- E3 Biodiversity Net Gain
- E4 Pollution and Contamination
- E6 Flood risk and sustainable drainage systems
- E7 Watercourses and water quality

Green Belt and Countryside

- GBC1 Development of new buildings in the Green Belt
- GBC2 Development of Existing Buildings in the Green belt
- GBC4 Development in the Countryside

Design and Heritage

- DH1 Design Principles
- DH7 Heritage Assets



Appendix 4: Development Plan Policies to be superseded by the Surrey Heath Local Plan (2019 – 2038)

The following table sets out how Development Plan Policies set out in the:

1. Saved Surrey Heath Local Plan 2000 policies,
2. Surrey Heath Core Strategy; and
3. Camberley Town Centre Area Action Plan,

will be replaced by Policies and allocations in the Surrey Heath Local Plan (2019 – 2038).

Table 23 – Superseded Policies

Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) Policy	Existing Policy Source: Saved Local Plan (SLP) Core Strategy (CS) Camberley Town Centre AAP (AAP)	Policies to be superseded
Spatial Strategy		
SS1: Spatial Strategy	Core Strategy	CP1: Spatial Strategy CP3: Scale and Distribution of new housing CP9: Hierarchy and role of centres CP10: Camberley Town Centre
SS2: Presumption in Favour of Sustainable Development	Core Strategy	CP2: Sustainable Development and Design
SS3a: Climate Change Mitigation	Core Strategy	CP2: Sustainable Development and Design DM7: Facilitating Zero Carbon Development
SS3b: Climate Change Adaptation	Core Strategy	CP2: Sustainable Development and Design DM7: Facilitating Zero Carbon Development
Housing		



Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) Policy	Existing Policy Source: Saved Local Plan (SLP) Core Strategy (CS) Camberley Town Centre AAP (AAP)	Policies to be superseded
HA1: Housing Allocations	Core Strategy	CP3: Scale and Distribution of new housing
	Saved Local Plan	H3: Housing Allocation Sites 2001 – 2006 H6: Land at Notcutts Nursery and Woodside Cottage, Bagshot H8: Housing Reserve Sites E8: Land at Half Moon Street Bagshot
	Camberley Town Centre Area Action Plan	TC4: Housing TC15: Camberley Station TC19: Former Magistrates Court
HA2: London Road Block	Camberley Town Centre Area Action Plan	TC14: London Road Block
HA3: Land East of Knoll Road	Camberley Town Centre Area Action Plan	TC18: Land East of Knoll Road
HA4: Mindenhurst, Deepcut	Core Strategy	CP4: Deepcut
	Saved Local Plan	H3: Housing Allocation Sites 2001 - 2006
H5: Range and Mix of Housing	Core Strategy	CP6: Dwelling Size and Type
H6: Specialist Housing	Core Strategy	CP6: Dwelling Size and Type
H7: Affordable Housing	Core Strategy	CP5: Affordable Housing
H8: Loss of Housing		No specific existing policy
H9: Rural Exception Sites	Core Strategy	DM5: Rural Exception Sites
H10: First Homes Exception Sites		No specific existing policy
H11: Gypsies and Travellers and Travelling Showpeople (criteria based)	Core Strategy	CP7: Gypsies and Travellers and Travelling Showpeople DM6: Gypsy and Traveller and Travelling Showpeople Accommodations



Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) Policy	Existing Policy Source: Saved Local Plan (SLP) Core Strategy (CS) Camberley Town Centre AAP (AAP)	Policies to be superseded
HA11A: Gypsy and Traveller allocations	Core Strategy	CP7: Gypsies and Travellers and Travelling Showpeople
Economy and Town Centre Uses		
CTC1: Camberley Town Centre	Camberley Town Centre Area Action Plan	TC1: General Policy for new development within the Town Centre TC2: Retail Development TC3: Food and Drink TC5 Employment TC6: Leisure, Community and Cultural Uses TC11: General Design TC12: High Street Character Area TC13: The Public Realm
	Core Strategy	CPI0: Camberley Town Centre
CTC2: Camberley Town Centre Primary Shopping Area	Camberley Town Centre Area Action Plan	TC2: Retail Development
CTC3: Camberley Town Centre Movement and Accessibility	Camberley Town Centre Area Action Plan	TC7: Accessibility TC8: Improvements to the Highway network
ERI: Economic Growth and Investment	Core Strategy	CP8: Employment DMI3: Employment Development outside Core Employment Areas & Camberley Town Centre
	Camberley Town Centre Area Action Plan	TC5: Employment
	Core Strategy	CP8: Employment



Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) Policy	Existing Policy Source: Saved Local Plan (SLP) Core Strategy (CS) Camberley Town Centre AAP (AAP)	Policies to be superseded
ER2: Strategic Employment Sites	Saved Local Plan	RE17: Major Developed Sites in the Green Belt M21 Development at Fair Oaks Airport
ER3: Locally Important Employment Sites	Core Strategy	CP8: Employment
	Saved Local Plan	RE17: Major Developed Sites in the Green Belt
ER4: Yorktown Business Park	Core Strategy	CP8: Employment
ER5: The Rural Economy	Core Strategy	DMI: The Rural Economy
ER6: Frimley Park Hospital		No site specific existing policy
ER7: Edge of Centre and Out of Centre Proposals	Saved Local Plan	TC1: Maintaining and Enhancing the role of the Town Centre
ER8: District Centres and Local Centres	Core Strategy	DM12: District and Local Centres and neighbourhood Parades
ER9: Neighbourhood Parades	Core Strategy	DM12: District and Local Centres and Neighbourhood Parades
ER10: Old Dean		No specific existing policy
Infrastructure		
IN1: Infrastructure Delivery	Core Strategy	CPI2: Infrastructure Delivery and Implementations
IN2: Transportation	Core Strategy	CPI1: Movement DMI1: Traffic Management and Highway Safety



Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) Policy	Existing Policy Source: Saved Local Plan (SLP) Core Strategy (CS) Camberley Town Centre AAP (AAP)	Policies to be superseded
IN3: Digital Infrastructure and telecommunications	Core Strategy	CPI2: Infrastructure Delivery and Implementations DM9: Design Principles
IN4: Community Facilities	Core Strategy	DMI4: Community & Cultural Facilities
IN5: Green Infrastructure	Core Strategy	CPI3: Green infrastructure
IN6: Green Space	Core Strategy	DMI6: Provision of Open Space and Recreational Facilities
IN7: Indoor and Built Sports and Recreational Facilities	Core Strategy	DMI6: Provision of Open Space and Recreational Facilities



Environment		
E1: Thames Basin Heaths Special Protection Area	Core Strategy	CP14: Biodiversity and Nature Conservation
E2: Biodiversity and Geodiversity	Core Strategy	CP14: Biodiversity and Nature Conservation
E3: Biodiversity Net Gain	Core Strategy	CP14: Biodiversity and Nature Conservation
E4: Pollution and Contamination	Core Strategy	CP2: Sustainable Development and Design
E5: Renewable and Low Carbon Energy Schemes	Core Strategy	DM7: Facilitating Zero Carbon Development DM8: Stand alone decentralised, Renewable and Low Carbon Energy Schemes
E6: Flood Risk and Sustainable Drainage Systems	Core Strategy	DM10: Development and Flood Risk
E7: Watercourses and Water Quality	Core Strategy	CP2: Sustainable Development and Design
Green Belt and Countryside		
GBC1: Development of new buildings within the Green Belt	Core Strategy	DM1: The Rural Economy DM2: Development within Chobham
	Saved Local Plan	M21: Development at Fair Oaks Airport
GBC2: Development of Existing Buildings in the Green Belt	Core Strategy	DM2: Development within Chobham
GBC3: Equestrian Facilities	Core Strategy	DM3: Equestrian related development
GBC4: Development within the Countryside beyond the Green Belt	Core Strategy	DM4: Replacement, Extension or Alteration of Existing Residential Dwellings in the Countryside Beyond the Green Belt
GBC5: Gordons School	Saved Local Plan	RE17: Major Developed Sites in the Green Belt



Design and Heritage		
DH1: Design Principles	Core Strategy	CP2: Sustainable Development and Design DM9: Design Principles
	Camberley Town Centre Area Action Plan	TC11: General Design TC12: High Street Character Area TC13: The Public Realm
DH2: Making Effective Use of Land	Core Strategy	CP2: Sustainable Development and Design
DH3: Residential Space Standards		No existing policy
DH4: Sustainable Water Use	Core Strategy	DM9: Design Principles
DH5: Trees	Core Strategy	DM9: Design Principles
DH6: Shopfronts, Signage and Advertisements		No existing policy
DH7: Heritage assets	Core Strategy	DM17: Heritage
DH8: Building Emission Standards	Core Strategy	CP2: Sustainable Development and Design DM7: Facilitating Zero Carbon Development

The following Development Plan Policies are not directly replaced but will be deleted as they have either been fully completed, or will no longer be implemented.

Delete

SLP – Elements of H3: Housing Allocation Sites 2001 – 2006
 SLP – H6: Land at Notcutts Nursery and Woodside Cottage, Bagshot
 SLP – Elements of H8: Housing Reserve Sites
 SLP – E6: Employment Revitalisation Areas
 SLP – M1: Major Highway Proposals
 SLP – M4: Additional Car Parking
 SLP – M9: Rear Servicing
 SLP – M18: Safeguarded land for Future Transport Provision
 AAP – TC9: Pedestrians
 AAP – TC10: Rear Service Roads
 AAP – TC16: Land at Park Lane
 AAP – C17: Pembroke Broadway (north)





Sustainability Appraisal (SA) of the Surrey Heath Local Plan

SA Report

June 2024



AECOM Delivering a better world

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Table of Contents

1	Introduction.....	1
2	The plan scope.....	2
3	The SA scope.....	5
Part 1: What has plan-making / SA involved up to this stage?		7
4	Introduction to Part 1	8
5	Defining growth scenarios	10
6	Growth scenarios appraisal	45
7	The preferred growth scenario.....	62
Part 2: What are the appraisal findings at this stage?		63
8	Introduction to Part 2	64
9	Appraisal of the Local Plan	66
Part 3: What are the next steps?		90
10	Plan finalisation	91
11	Monitoring.....	91
Appendix I: Regulatory requirements		92
Appendix II: The SA scope		95
Appendix III: DM policy alternatives		110
Appendix IV: Chobham Green Belt RAs.....		113
Appendix V: Green Belt Review maps		115
Appendix VI: Site options GIS analysis		119

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.¹

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”.² 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.³

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).

¹ 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.

² Regulation 12(2) of the SEA Regulations

³ 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.

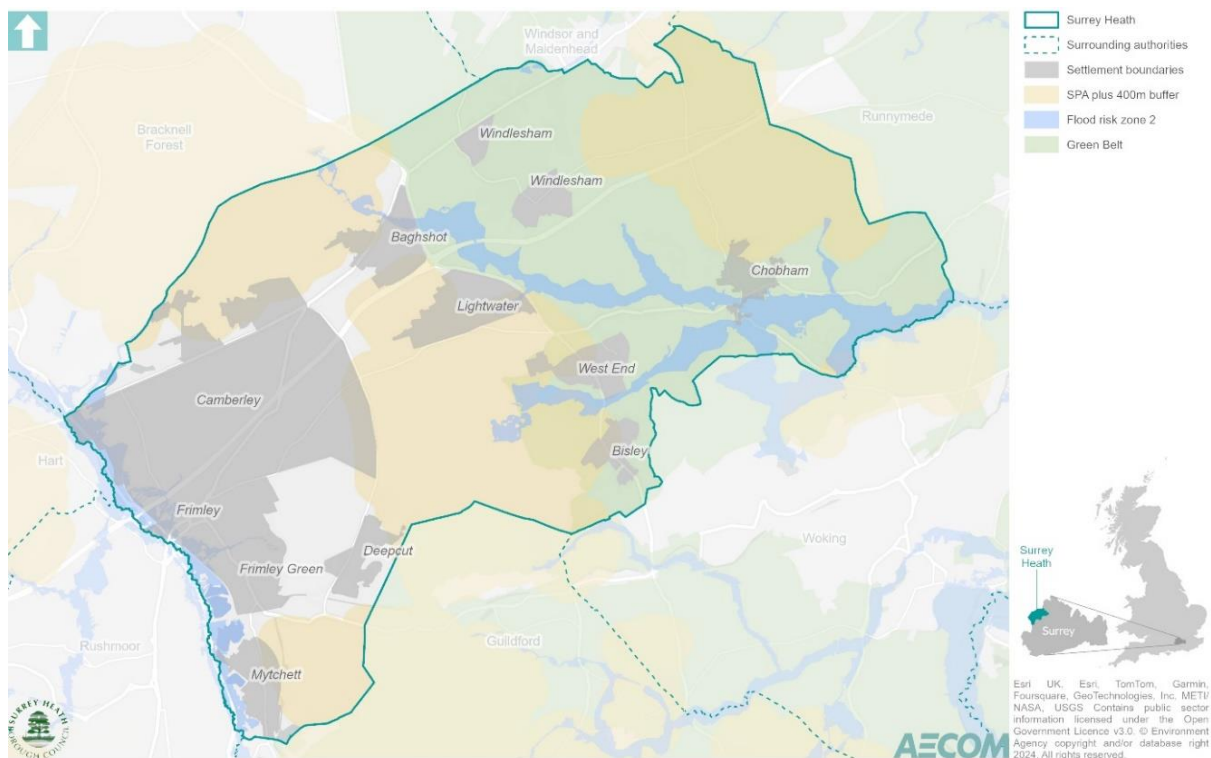
2.2 The plan area

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.⁴ 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 9th 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.

⁴ 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.⁵ 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.

⁵ 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"> • 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.
Air / env quality	<ul style="list-style-type: none"> • Ensure air quality continues to improve in line with national and/or WHO global targets. • Reduce noise pollution.
Biodiversity	<ul style="list-style-type: none"> • Conserve and enhance the borough's biodiversity. • Ensure the protection of the Special Protection Areas (SPAs).
Climate change adaptation ⁶	<ul style="list-style-type: none"> • Minimise the risk of flooding. • Encourage reduced water consumption.
Climate change mitigation	<ul style="list-style-type: none"> • Reduce greenhouse gas emissions. • Increase energy efficiency and increase the use of renewable energy. • Encourage the use of more sustainable modes of transport (active and public) and reduce traffic congestion.
Communities and health ⁷	<ul style="list-style-type: none"> • 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.
Economy and employment	<ul style="list-style-type: none"> • 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.
Heritage	<ul style="list-style-type: none"> • Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings.
Housing	<ul style="list-style-type: none"> • Meet identified housing need.
Landscape	<ul style="list-style-type: none"> • 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.
Land, soils and resources	<ul style="list-style-type: none"> • 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.
Transport	<ul style="list-style-type: none"> • Encourage the use of more sustainable modes of transport (public transport/cycling/walking) and reduce traffic congestion.
Water	<ul style="list-style-type: none"> • Maintain and improve the quality of water resources. • Encourage reduced water consumption.

⁶ 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.

⁷ 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.⁸

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.⁹

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

⁹ 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.¹⁰ 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).

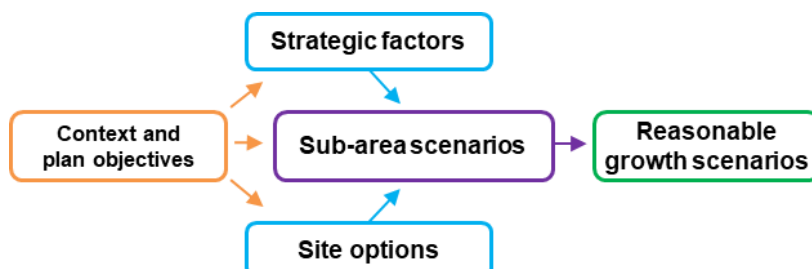
¹⁰ Recalling that to be ‘reasonable’ alternatives must be meaningfully different, to the extent that it is ultimately possible for an appraisal to confidently differentiate between the alternatives in terms of significant effects.

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 2020.¹¹ 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.

¹¹ 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.⁴ 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.¹² 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:¹³ *“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.

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

¹³ See paragraph 024 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.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.”*

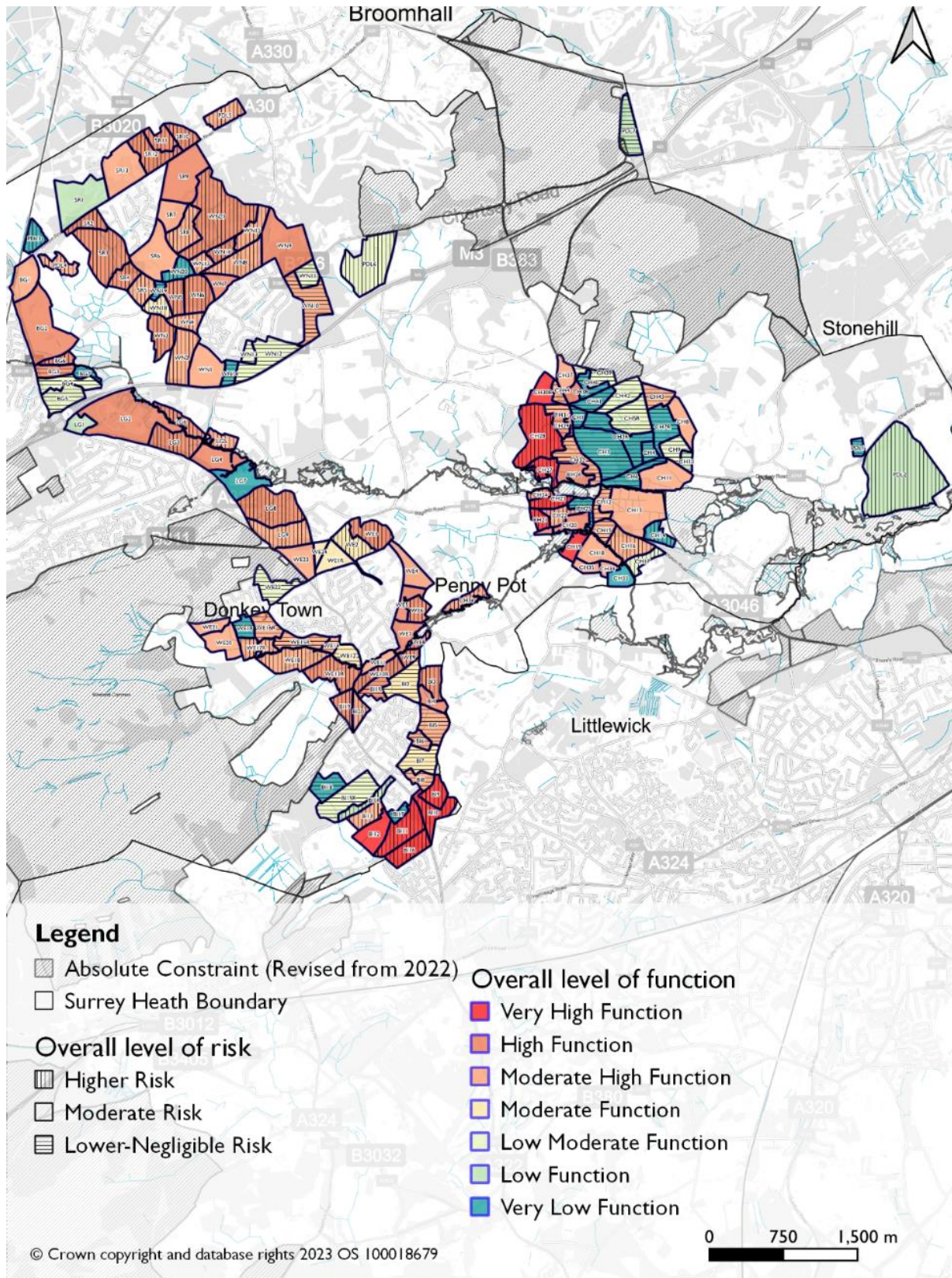
- Other constraints – the Interim Capacity Study explained that flood zone 3b is an absolute constraint to growth within parts of the borough. The Study also discussed the Farnborough Airport Public Safety Zone, although this is no longer considered a constraint following new guidance (DfT, 2021).

- 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 5th 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 6th 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).

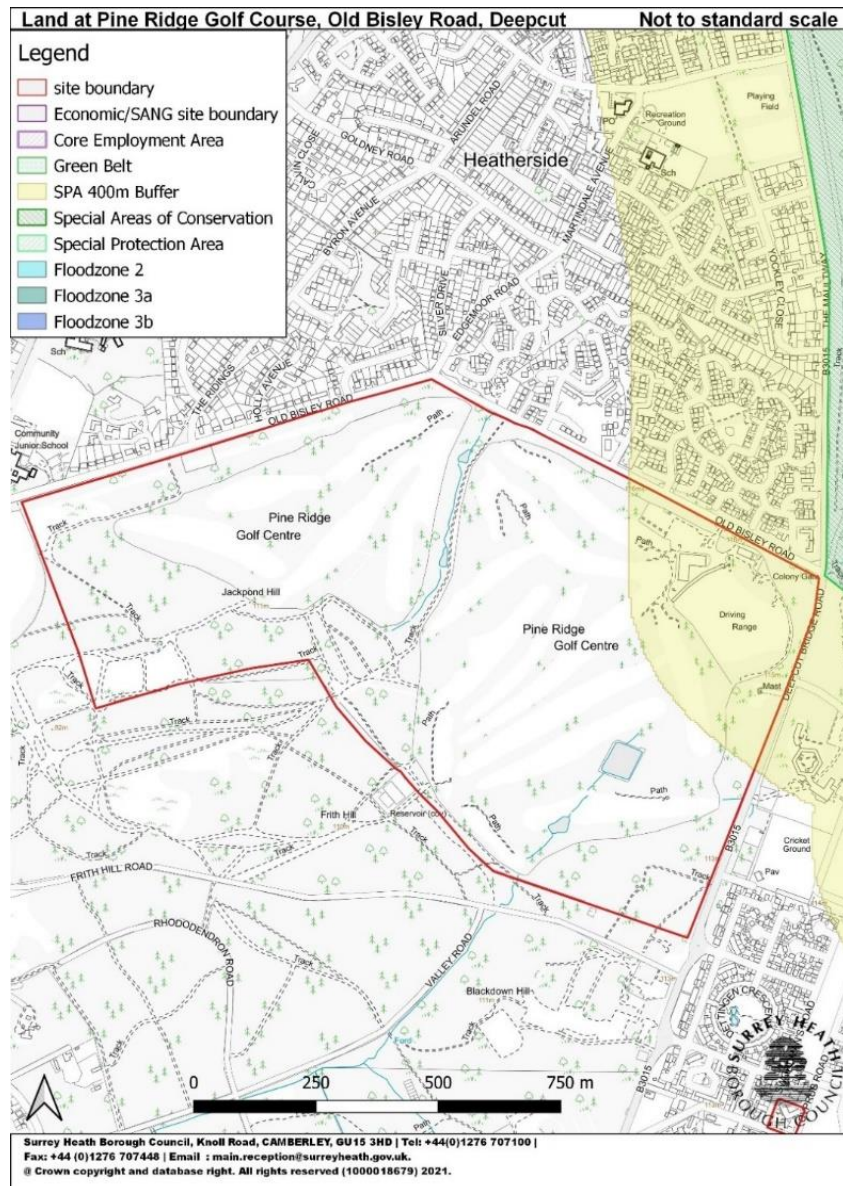
Box 5.1: Discussion of Land at Pine Ridge Golf Course

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.

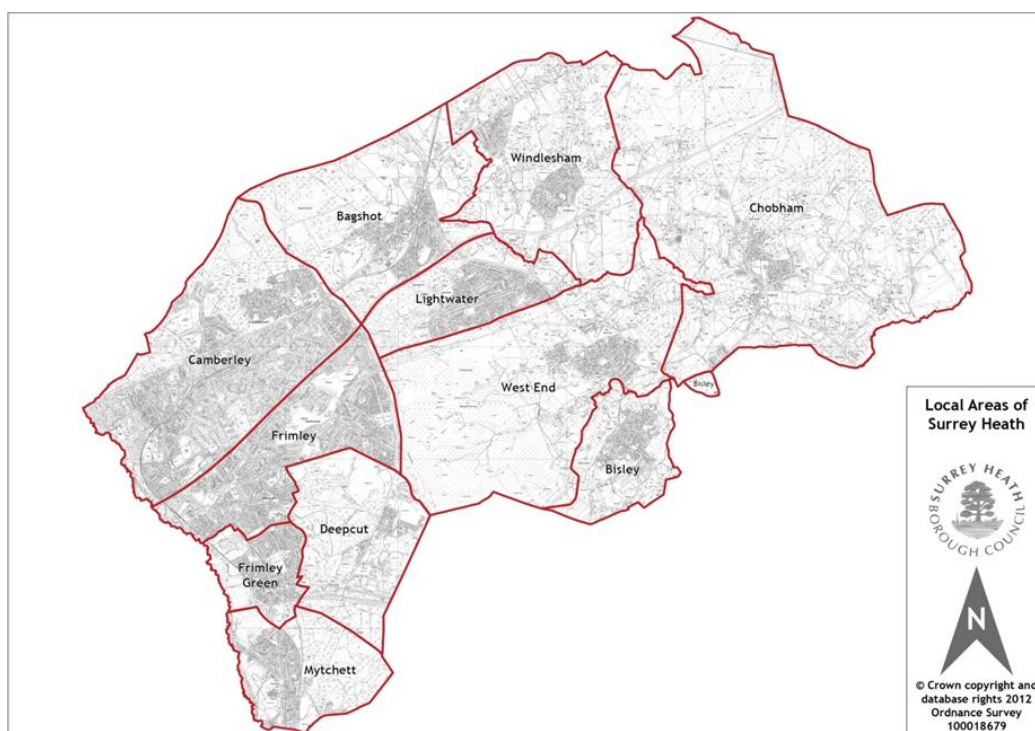


5.4 Sub-area scenarios

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)¹⁴ 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.

¹⁴ 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.

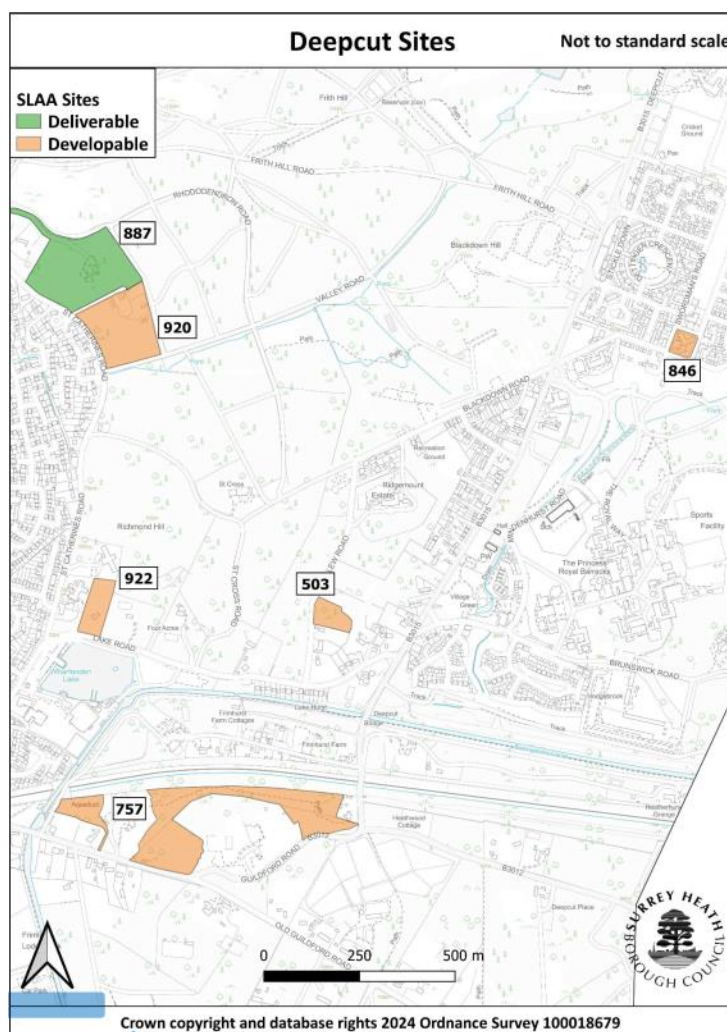
- **Site 846** – is a small previously developed site that gives rise to few issues.
- **Site 887** – this is a key site for consideration, as capacity of the site increased significantly between the 2021 SLAA and the 2022 SLAA. Specifically, whilst the capacity was previously 10 units C2 to reflect “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.¹⁵
- 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 ¹⁶	1,990	1,990
Windfall	481	481
SLAA sites ¹⁷	2,040	2,040
Fairoaks Garden Village	0	1,000
Total supply (2019-2038)	6,012	7,012
% above 5,578 (294 dpa)	8%	26%

¹⁵ 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

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

¹⁷ 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.¹⁸ Also see the two maps below.¹⁹
- 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 16,546m² floorspace for office / R&D and a residual need for 44,609m² 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 ~16,500 + ~44,500 = ~61,000m² 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 20,300m² for offices (i.e. an increase given recent permissions); up 22,600m² for industrial (i.e. a decrease).

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

¹⁹ 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 **~74,000m²** 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
Residual Floorspace Need	7,246	16,546	19,609	44,609

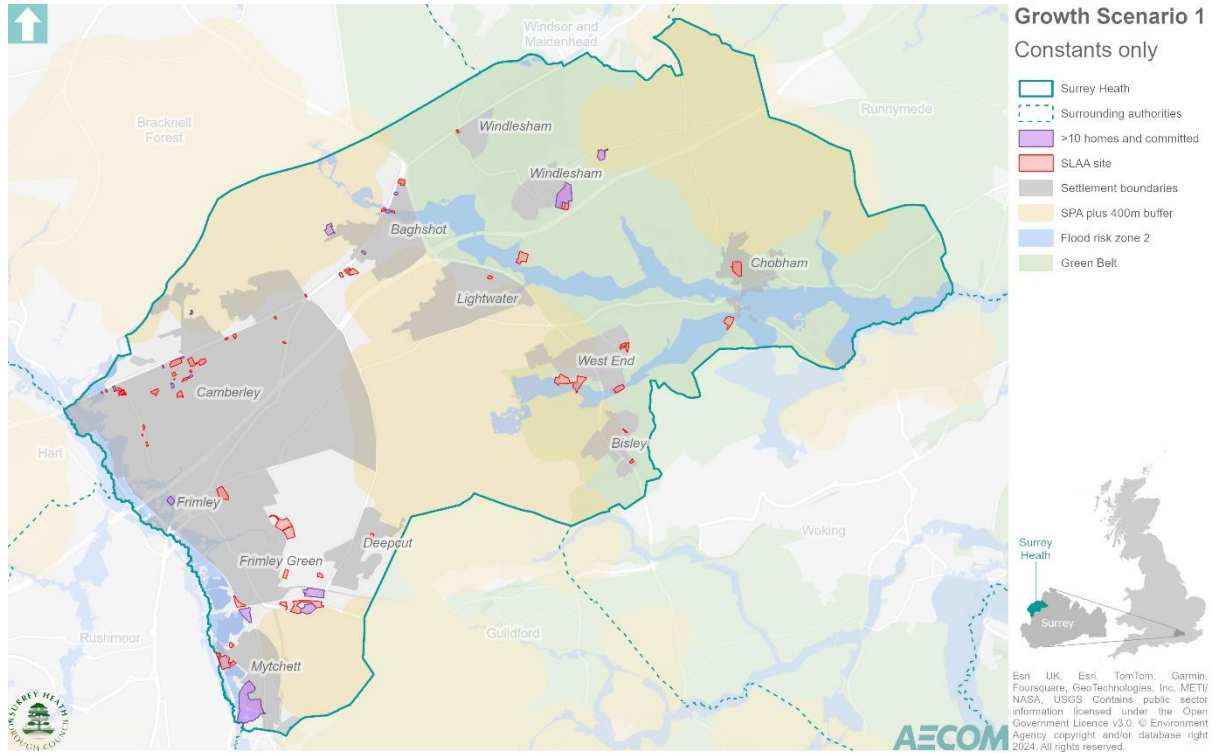
Box 5.3: Assumptions made regarding Gypsy, Traveller and Travelling Showpeople accommodation

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.

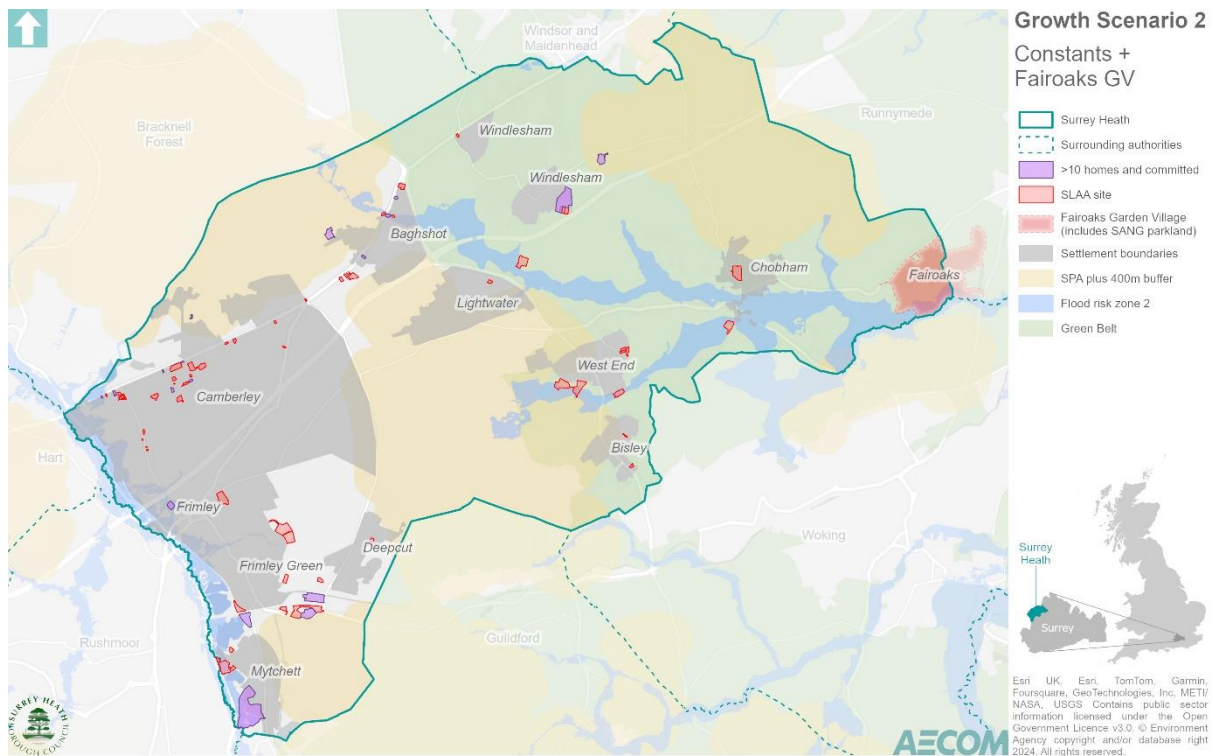
To recap, whilst detailed work was undertaken in 2022 to define and appraise reasonable scenarios, as reported in Sections 5 and 6 of the [Interim SA Report Addendum](#) published for consultation as part of a targeted consultation, matters have since moved on, such that three of the four allocation 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 + Fair Oaks	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**).²⁰

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 + Fair Oaks 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.

²⁰ **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
	2

- 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
	2

- 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;²¹ 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.

²¹ 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](#).²² 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.

²² 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.

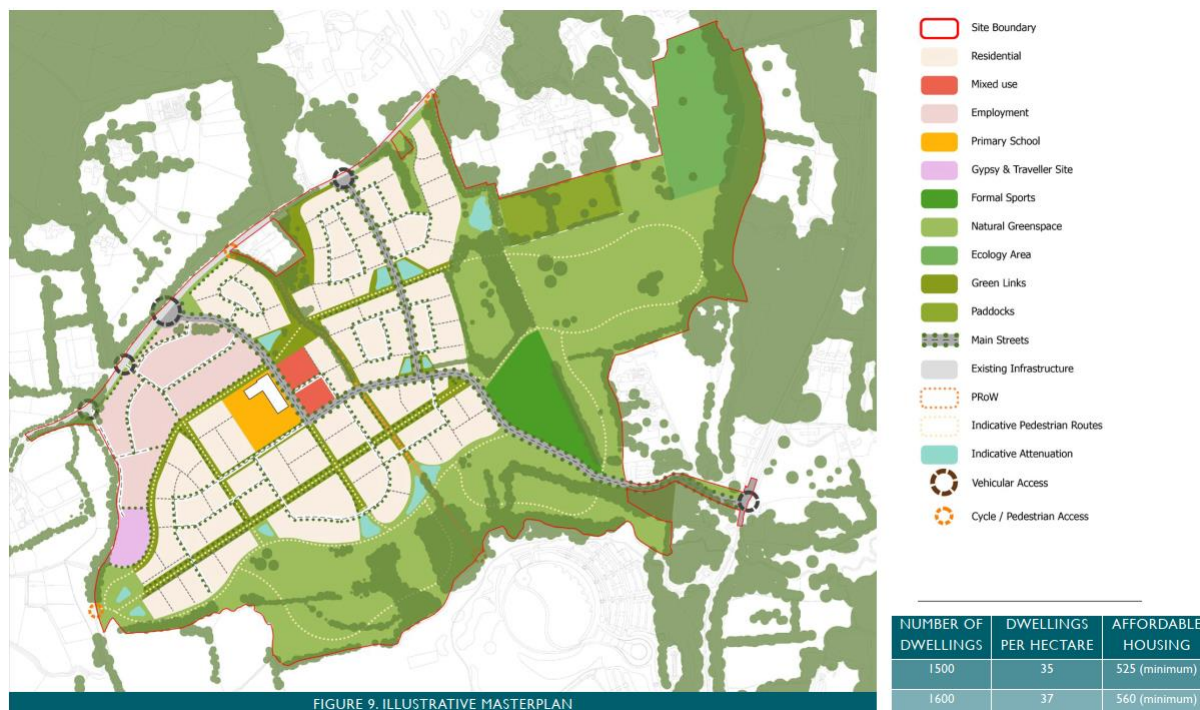
- Sites outside of settlement boundaries – several small sites are identified as deliverable or developable by the SLAA that would be located outside of a defined settlement boundary, including to the south of Bagshot, to the south of Chobham, at Deepcut and between Windlesham and Lightwater.
- Play 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.²³

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:



²³ 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
	2

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 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 Fairoaks 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 + Fairoaks
	Rank of preference (numbers) ²⁴ and categorisation of effects (shading) ²⁵	
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

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

²⁵ **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 1st April 2023, with one exception, namely Mindenhurst, Deepcut (Policy H4). This site had planning permission as of 1st April 2023 (and so is listed in Appendix 4 of the SLAA) but warrants a policy in the plan due to its strategic importance).²⁶ Also, it should be noted that some sites have gained planning permission since 1st 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.

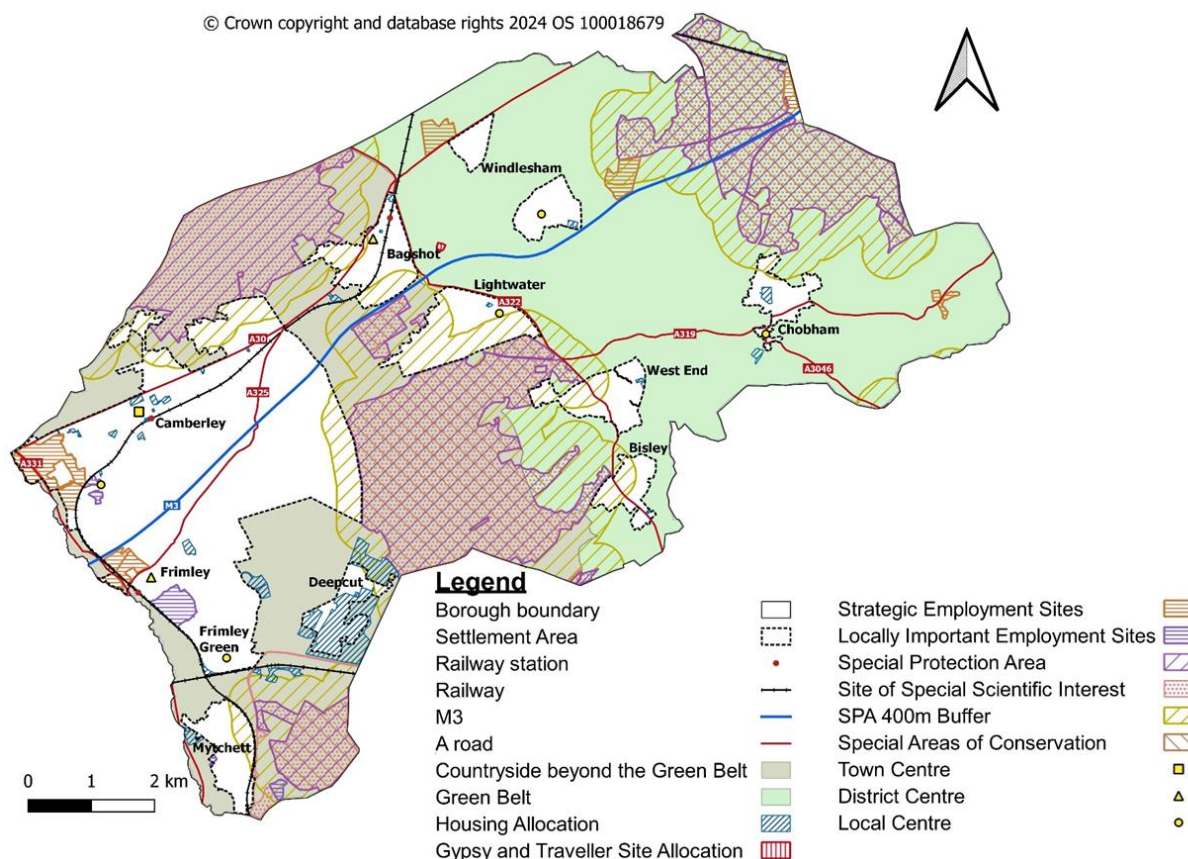
8.2.4 Proposed allocations are also shown on the **Key Diagram**, which is reproduced below. Importantly, the Key Diagram also shows existing employment sites, all of which are discussed in the Employment Supply Assessment (2023), which concludes that several have potential for intensification and so, 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.

²⁶ 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.²⁷ It is recommended that ongoing consideration is given to ensuring comprehensive growth with a long term perspective, including with a view to realising benefits.

²⁷ 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 **PM_{2.5}** 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 PM_{2.5} 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 NO₂).
- 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 19thC or early 20thC 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,²⁸ 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:

²⁸ 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), 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,²⁹ 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.

²⁹ 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

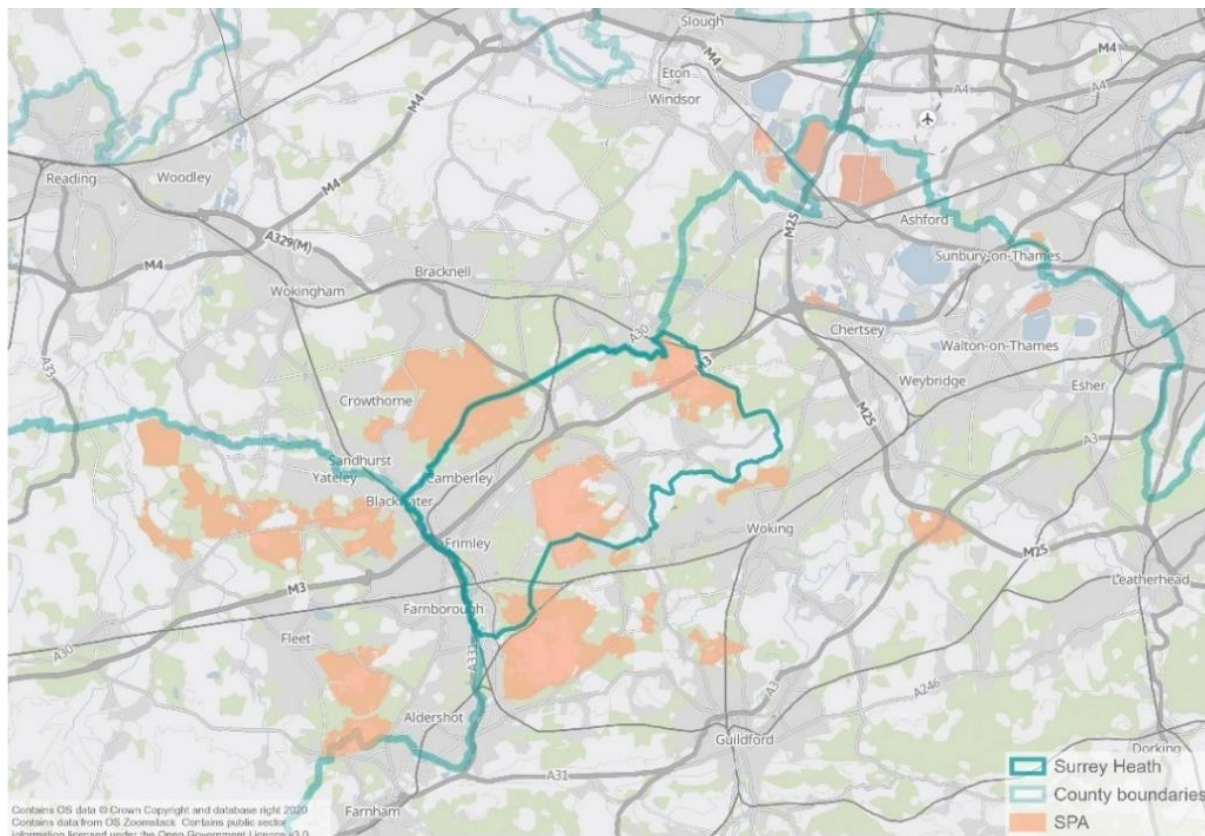


Figure 9.2: Camberley town centre – an important centre in the sub-region



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

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 & 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> [Part 1 of the Report]
(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> [Part 2 of the Report]
	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> [Part 3 of the Report]

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)

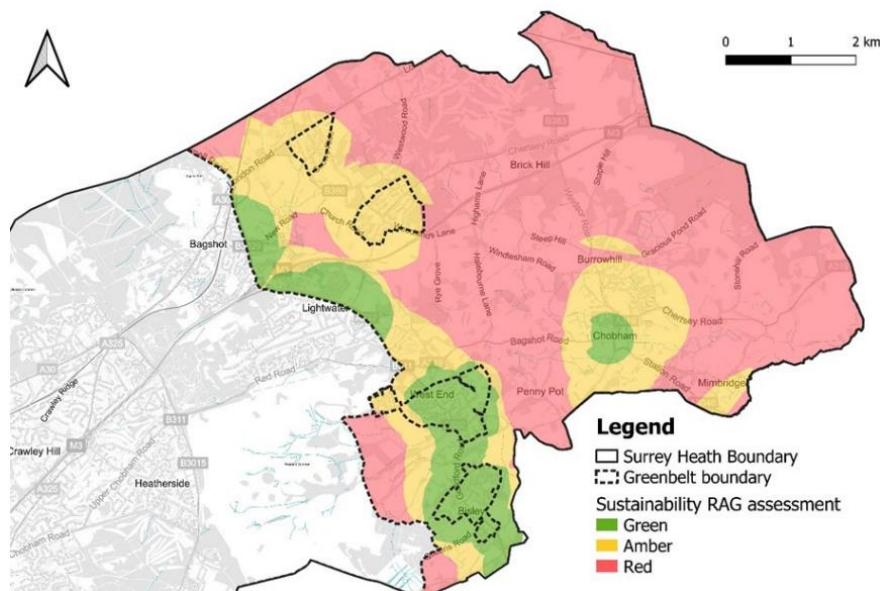
Sustainability objectives include:

- 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:

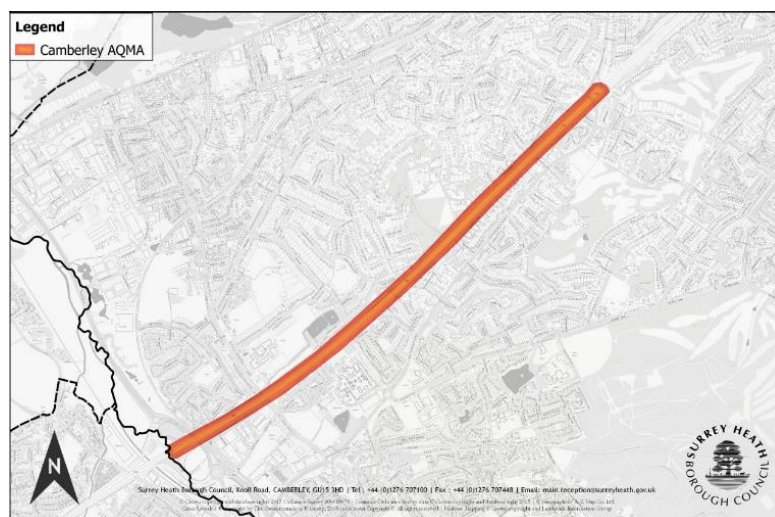
- Ensure air quality continues to improve in line with national and/or WHO global targets
- Reduce noise pollution

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.

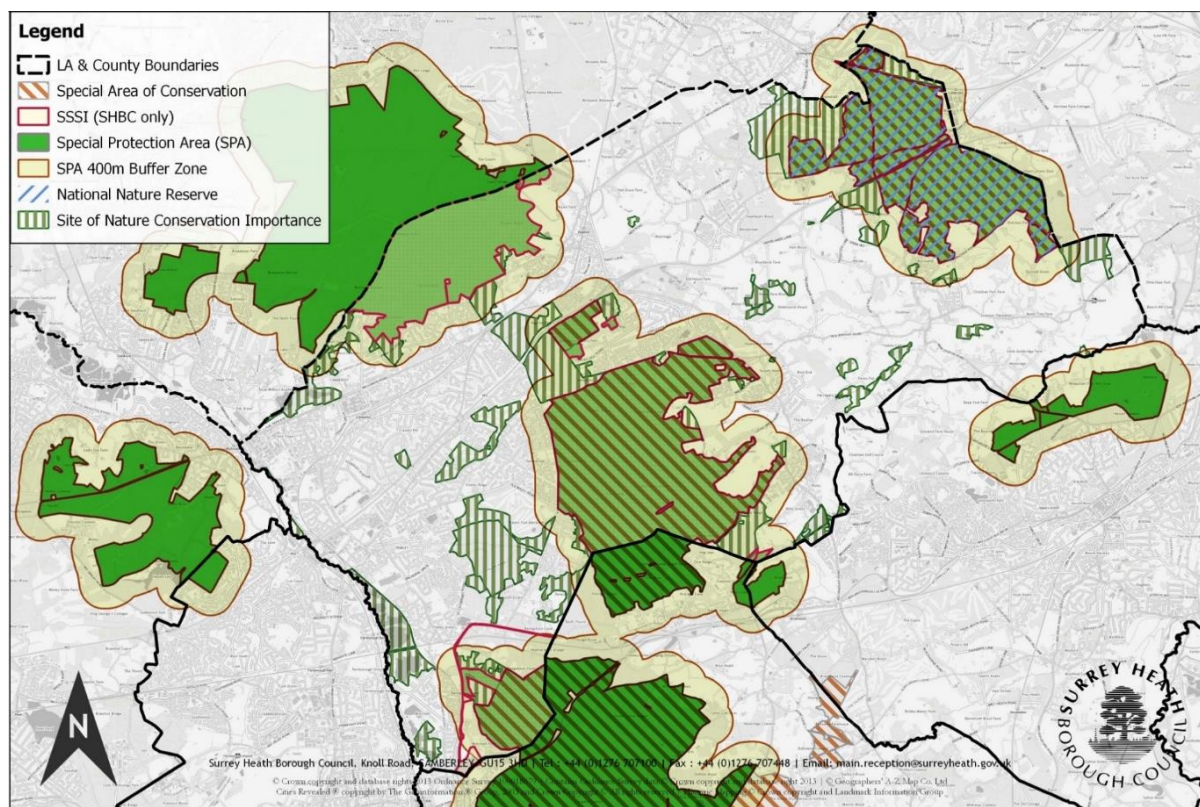
Beyond known priority habitat, it is also possible to identify areas likely to comprise habitat of value or note, including areas of woodland, forestry and scrub, plus of course hedgerows are of biodiversity importance (historic mapping can be interrogated to understand more) as are copses and individual 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).

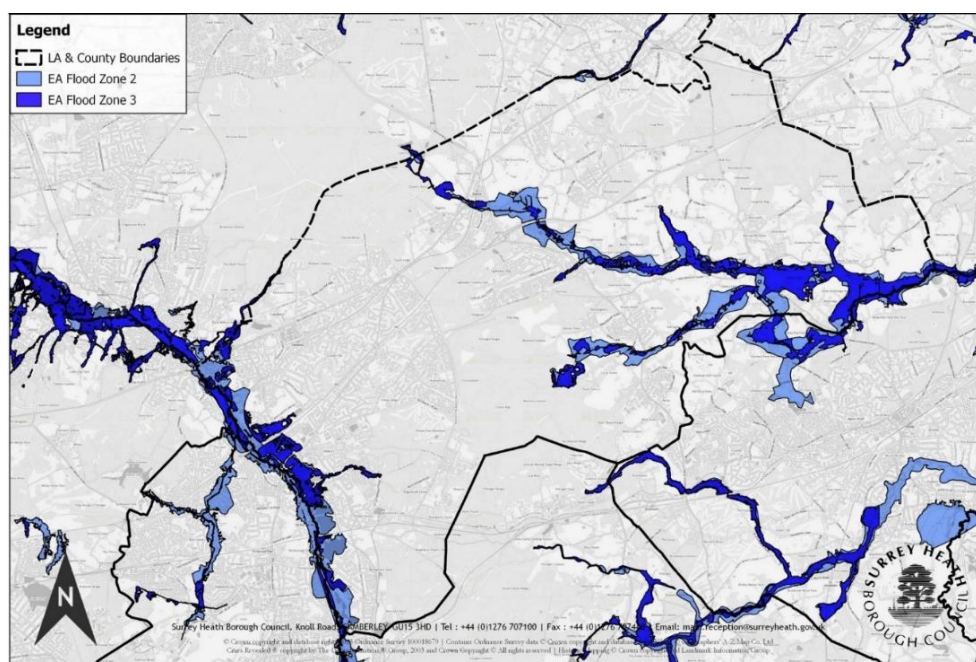
In this light, it is appropriate to focus on flood risk, as a key climate change adaptation consideration. Known flood zones are predicted to expand under climate change scenarios, and the frequency and intensity of flooding within flood zones could also worsen. Fluvial flood risk is a key consideration, 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 13th 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 emissions³⁰

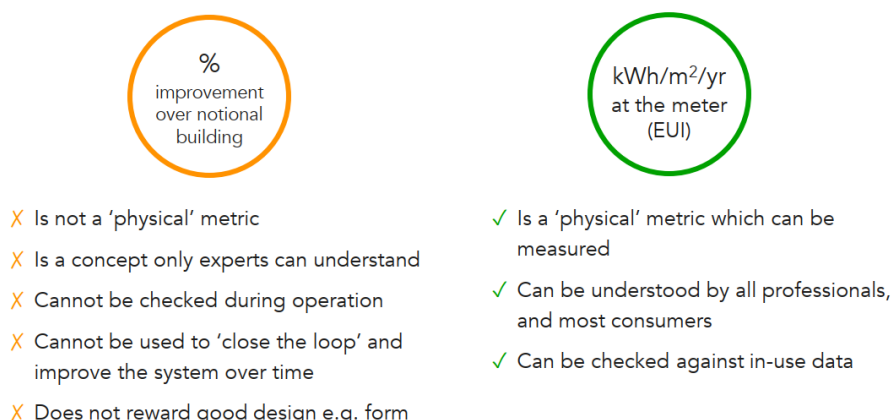
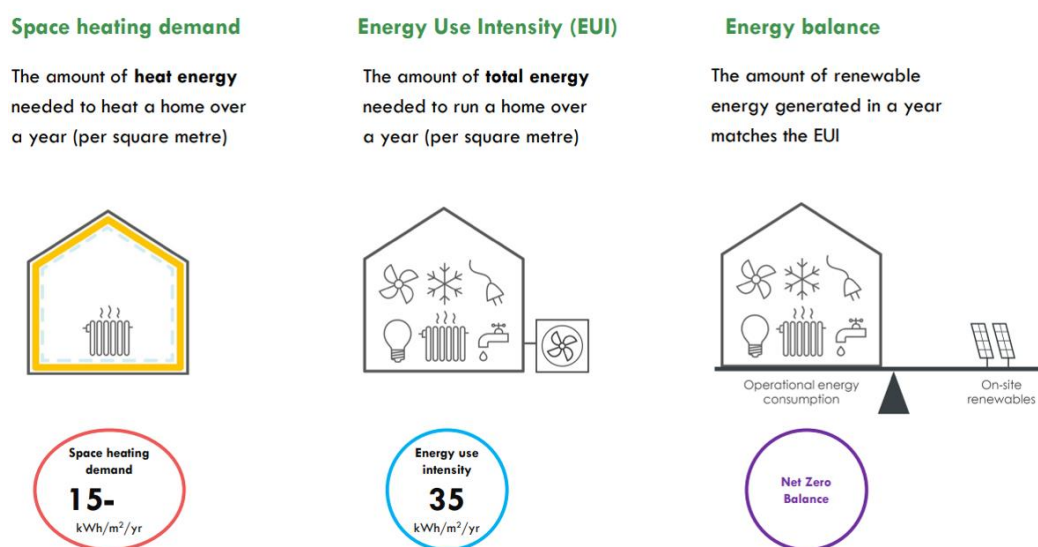


Figure F: An overview of the energy based / EUI approach to operational net zero (Source: LETI)



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

Communities

Sustainability objectives include:

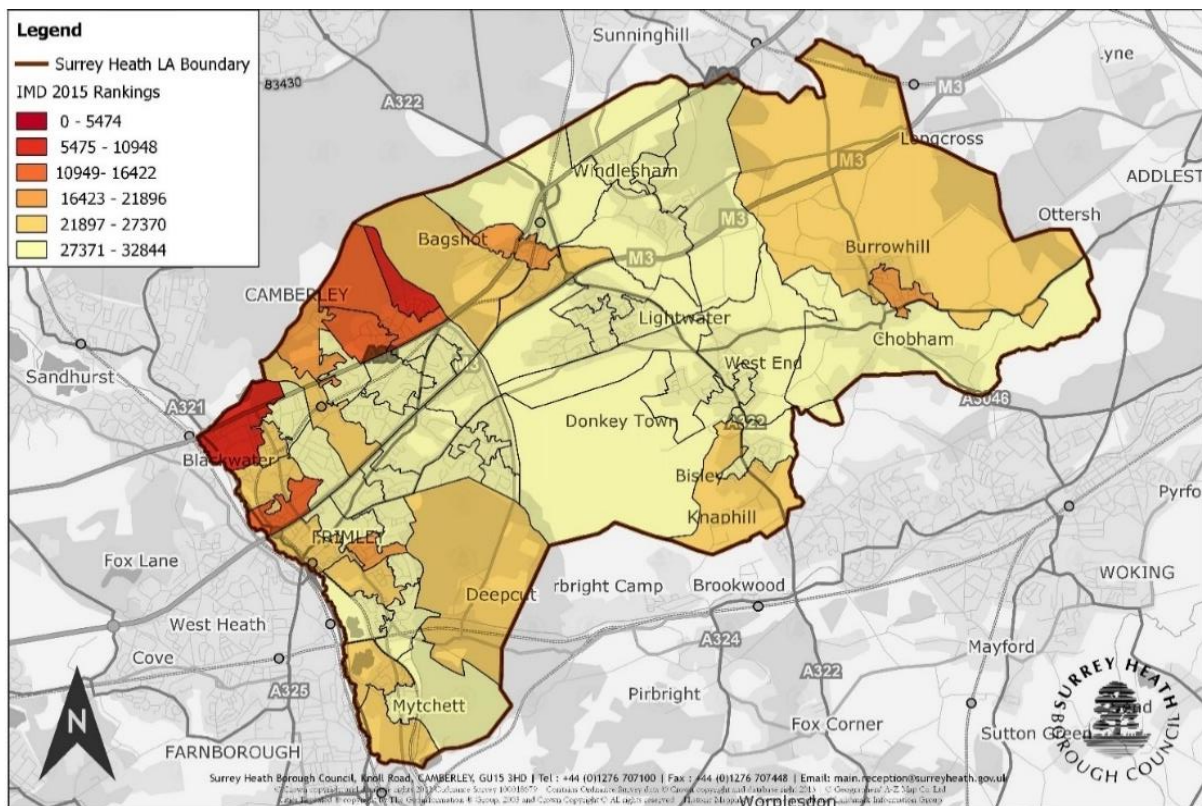
- Improve the population’s health
- Improve the education and skills of the local population
- Reduce crime, fear of crime and social exclusion
- Encourage the enjoyment of the countryside, open spaces and local biodiversity
- Sustain and enhance the viability and vitality of town, district and local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

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)

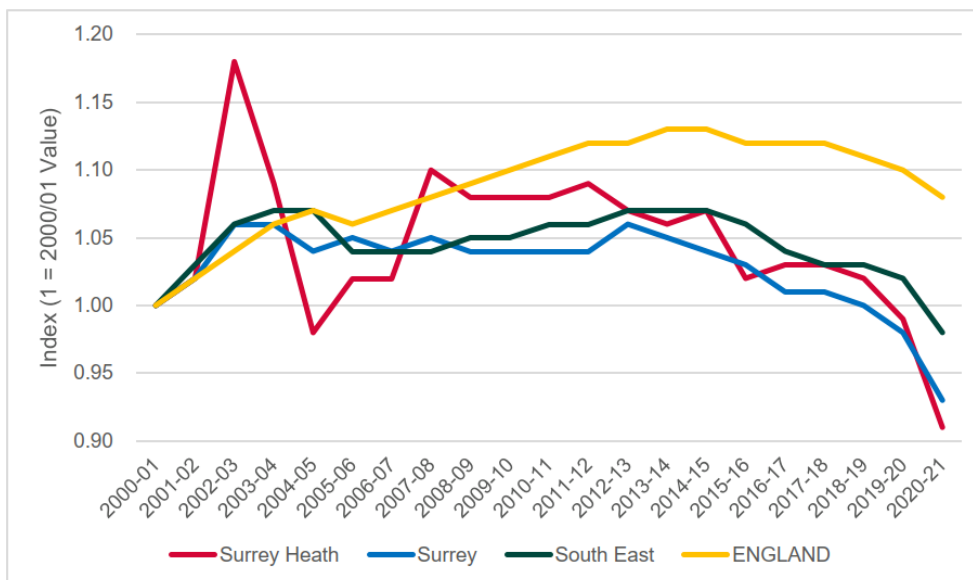
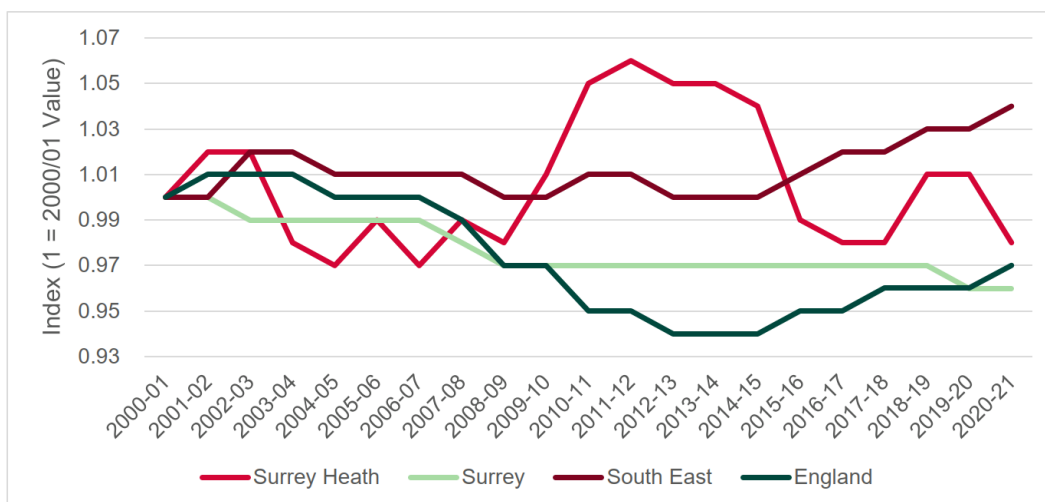


Figure I: Indexed industrial floorspace change (2000/01 – 2020/21)



Historic environment

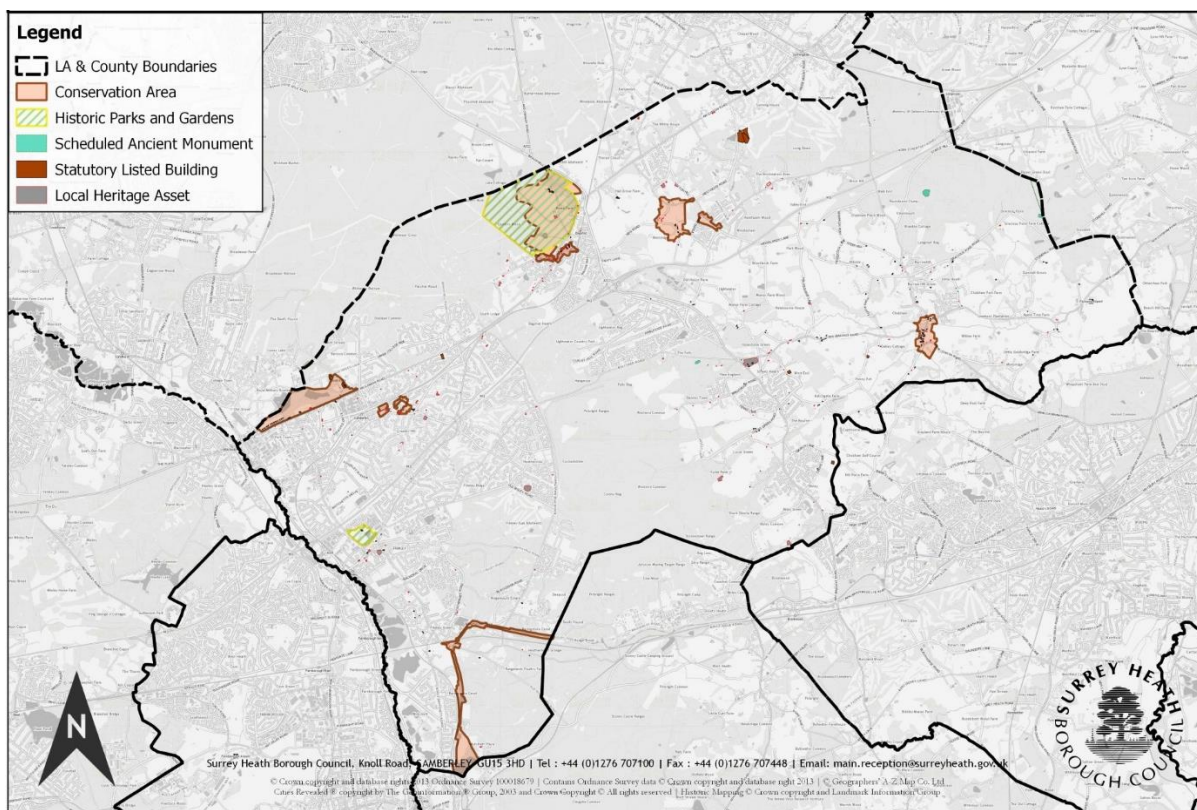
Sustainability objectives include:

- 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)³¹

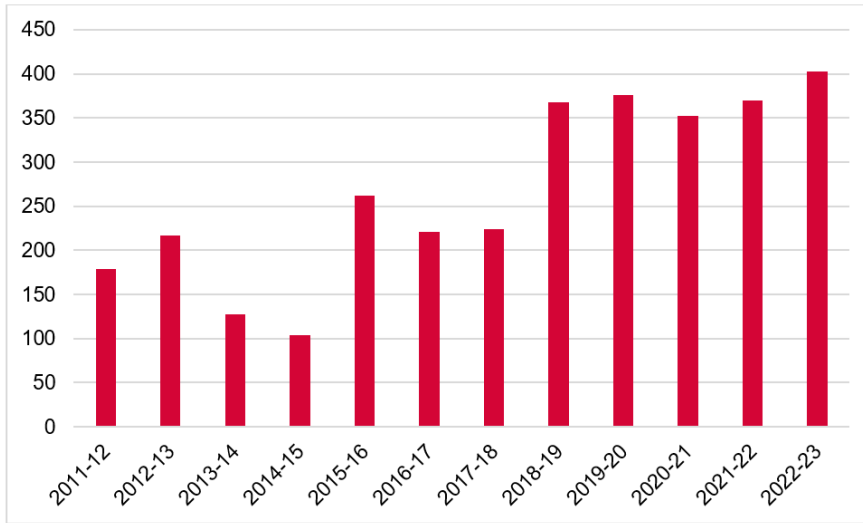


Figure L: Median affordability ratio (1997-2022)³²

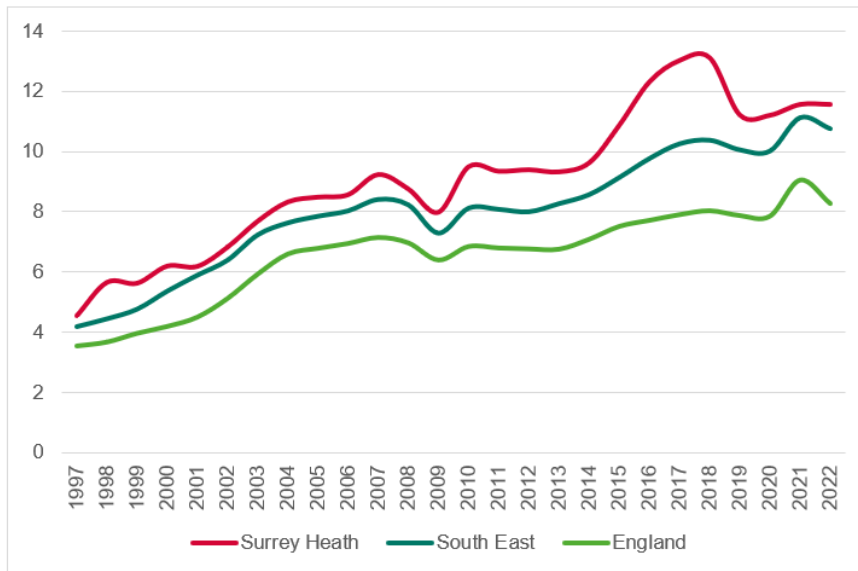


Figure M: Changing tenure profile 2011-2021



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

³² This is the ratio of house prices to local salaries

Figure N: Change in household spaces by bedrooms (2011-2021)³³

	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)³⁴

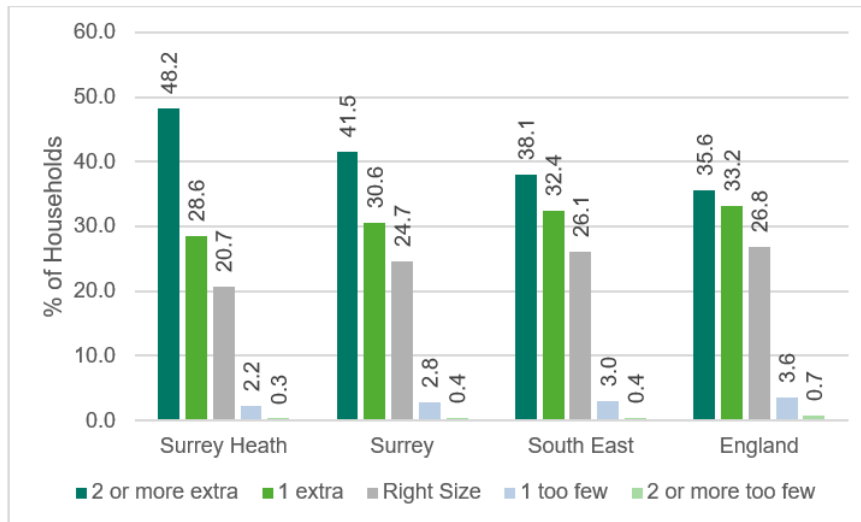
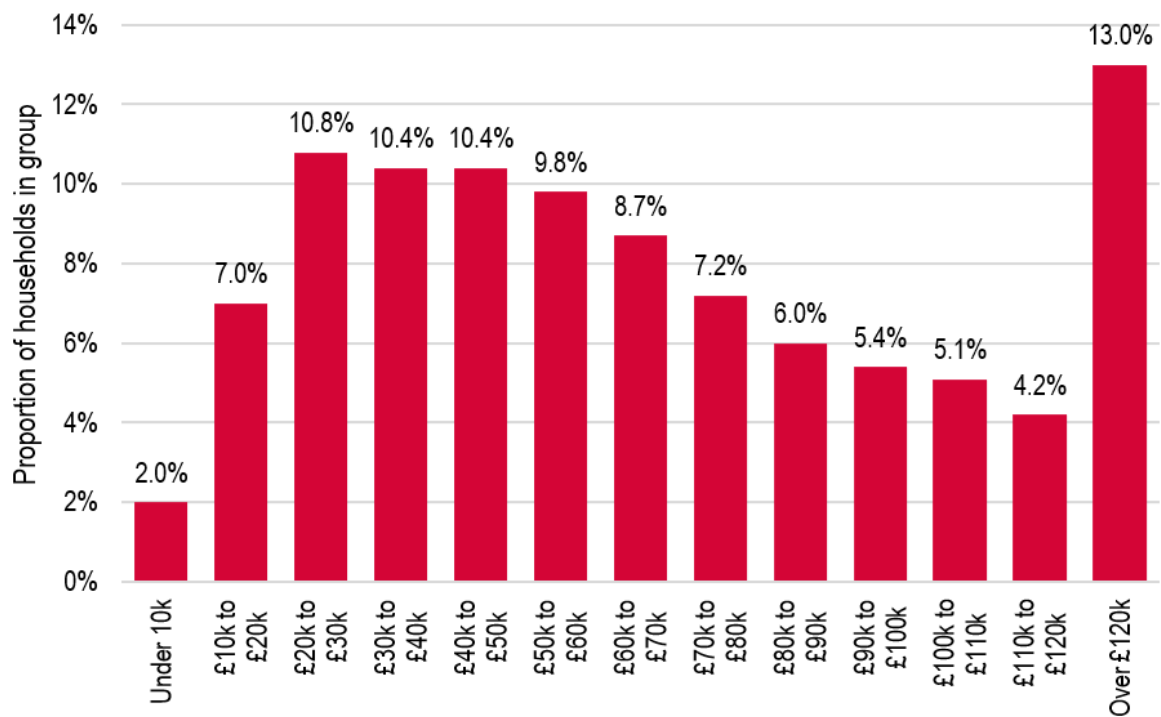


Figure P: Distribution of household income in Surrey Heath (2022)³⁵



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

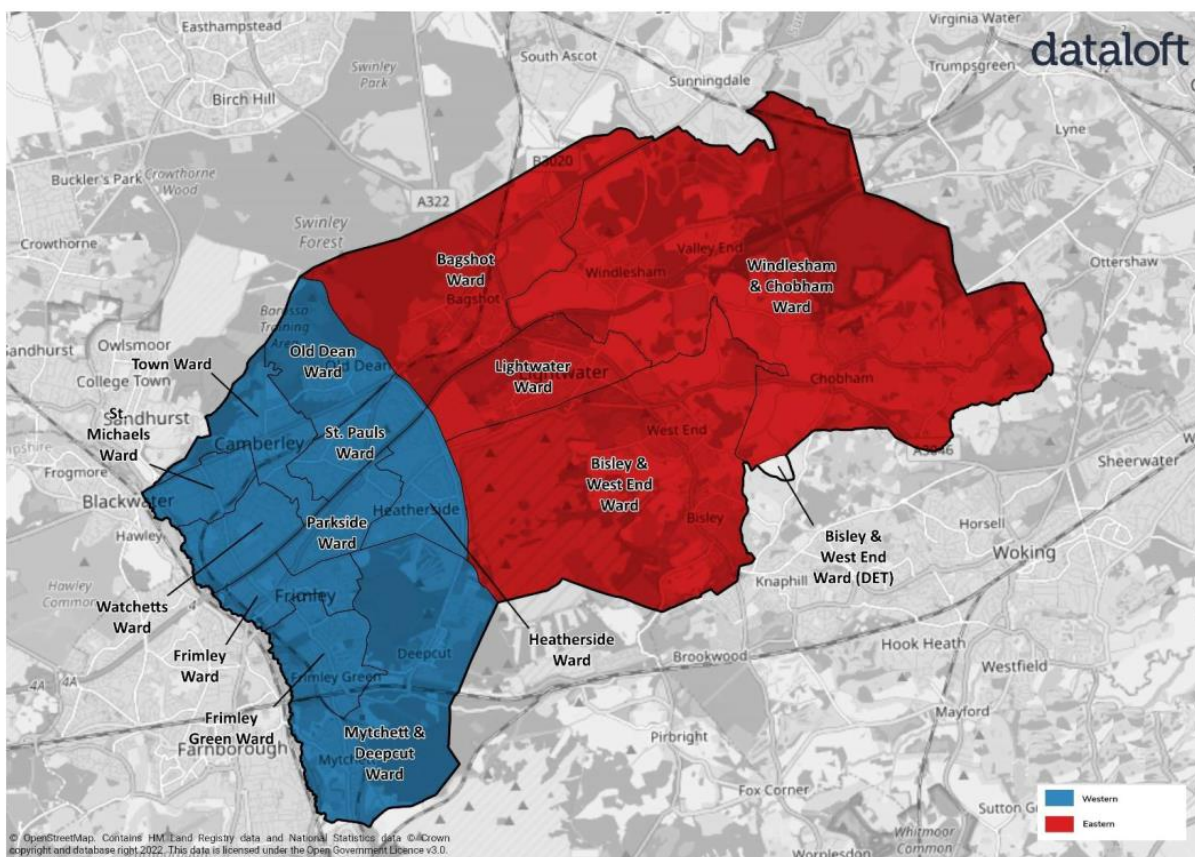
³⁴ A high proportion of homes are under occupied, suggesting a need to support downsizing.

³⁵ This is presented as context to consideration of affordable housing needs.

Figure P: Households in need of affordable housing by category³⁶

	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
TOTAL	1,691	646	2,338

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



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

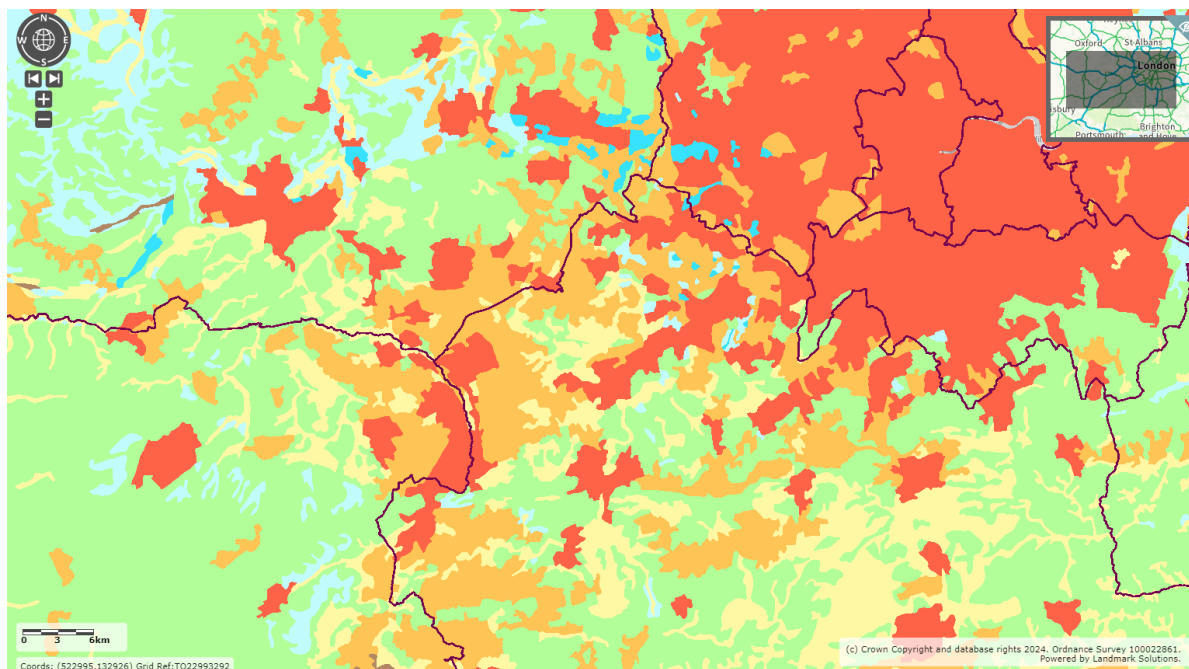
A key issue for local plans is often avoiding the loss of productive agricultural land, particularly best and most versatile land, which is that classified as Grade 1, 2 or 3a. However, there are also wider issues for consideration, including avoiding the sterilisation of minerals resources, and another 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.

³⁶ This is presented as context to consideration of affordable housing needs.

³⁷ 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 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

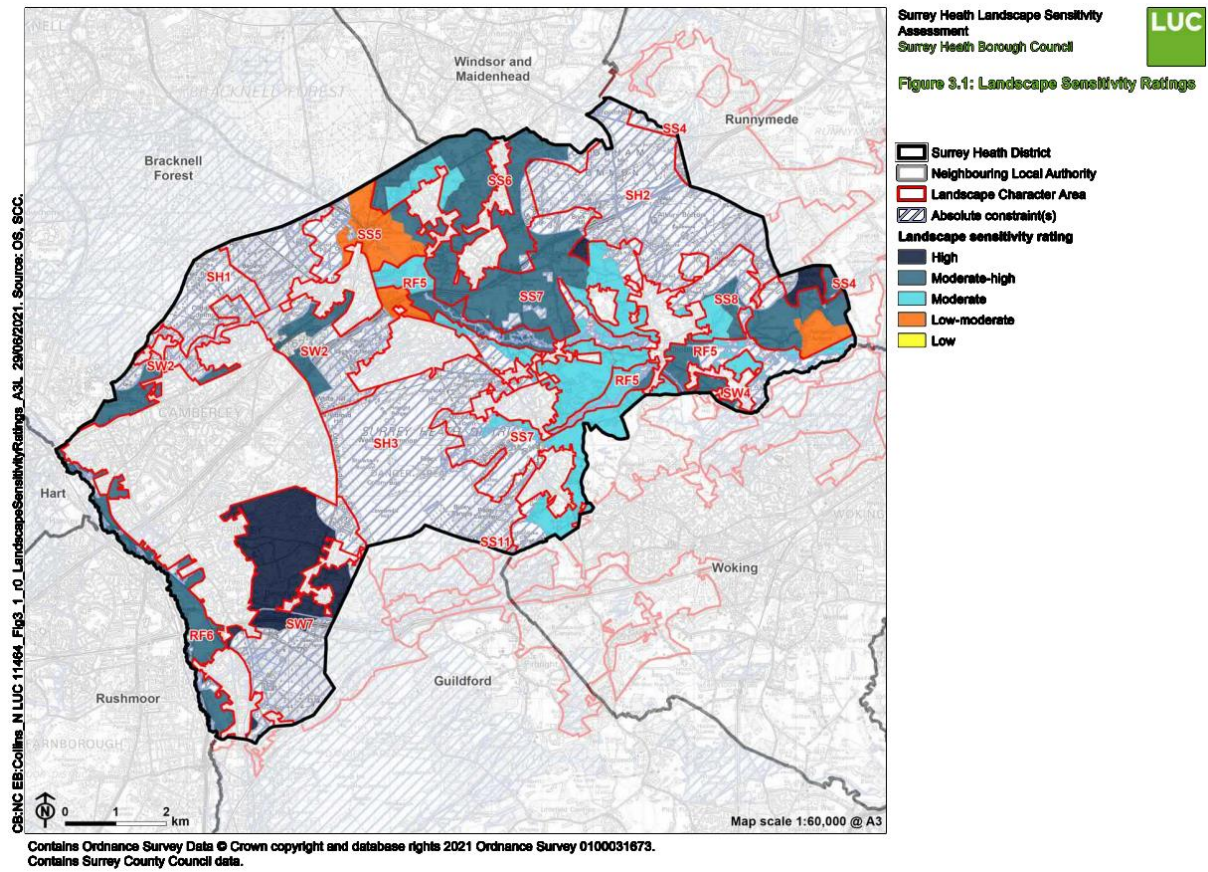


Figure S. Contribution of broad parcels within the Green Belt and CBGB to 'towns merging' GB purpose

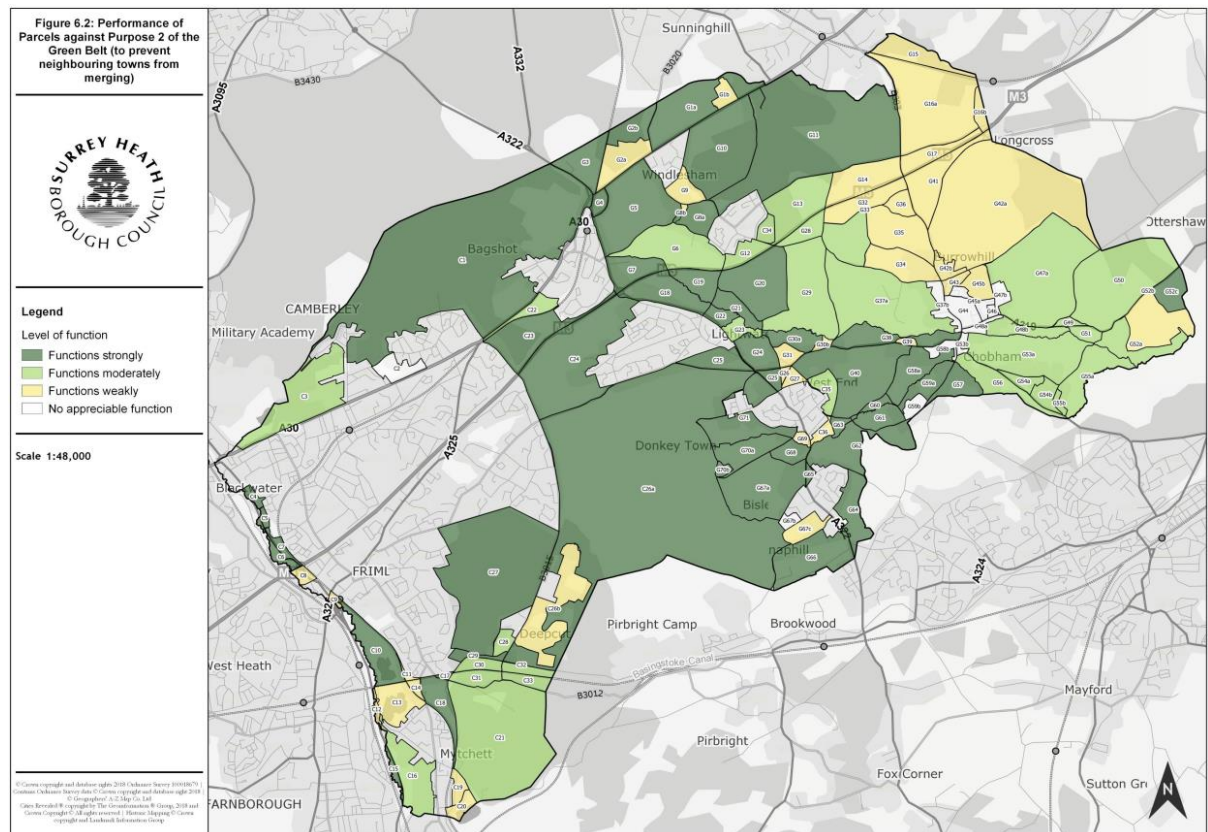
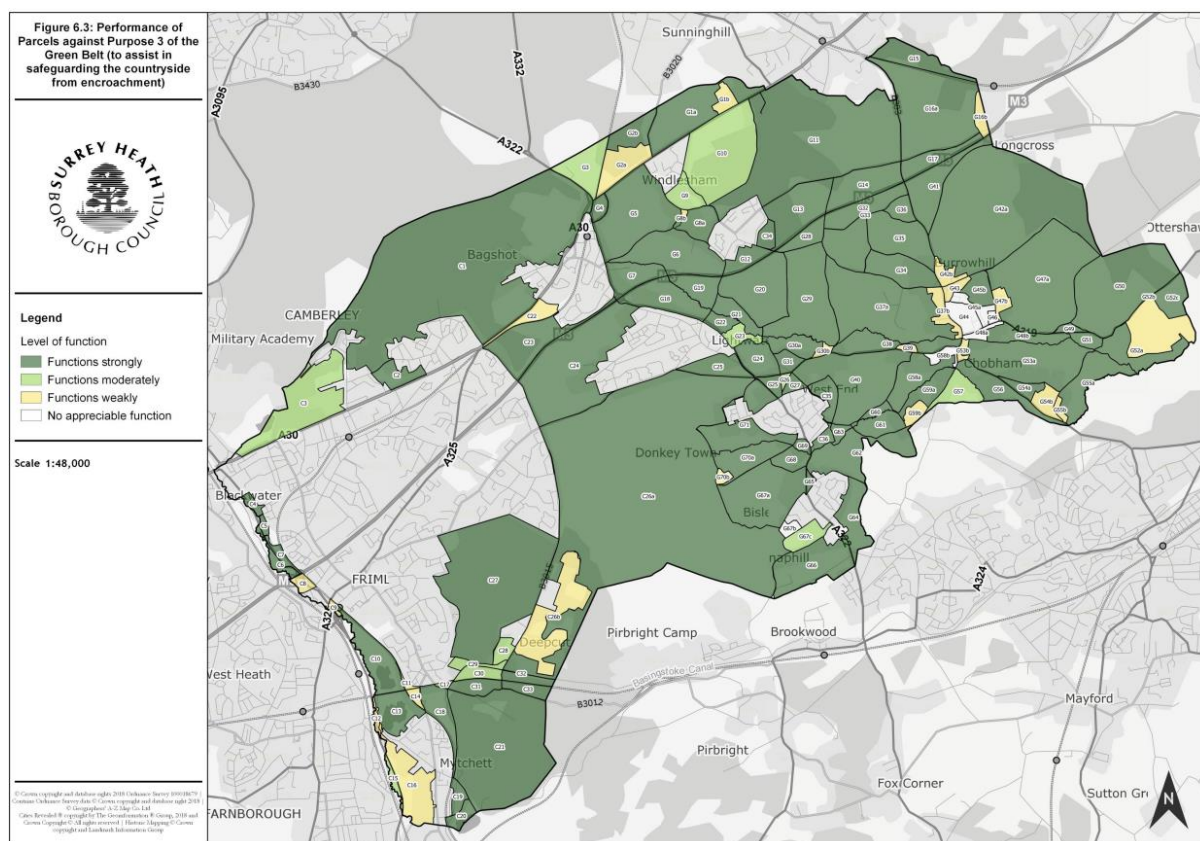


Figure T. Contribution of broad parcels within the Green Belt and CBGB to ‘countryside encroachment’ GB purpose



Transport

Sustainability objectives include:

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

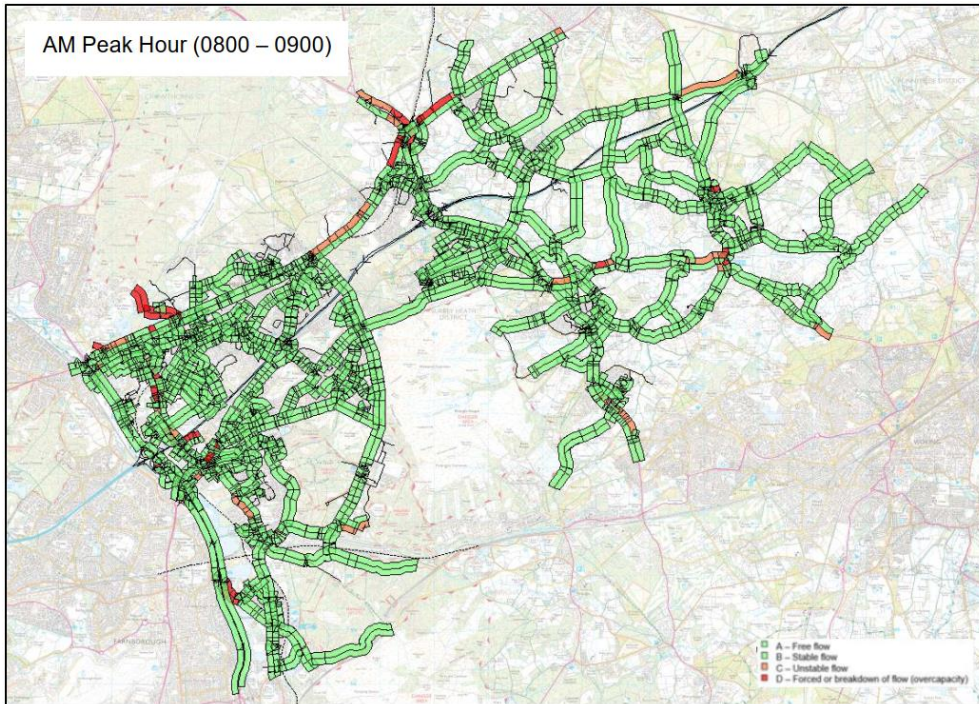
Transport is clearly a key issue for any local plan. There is a need to be guided by latest:

- 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



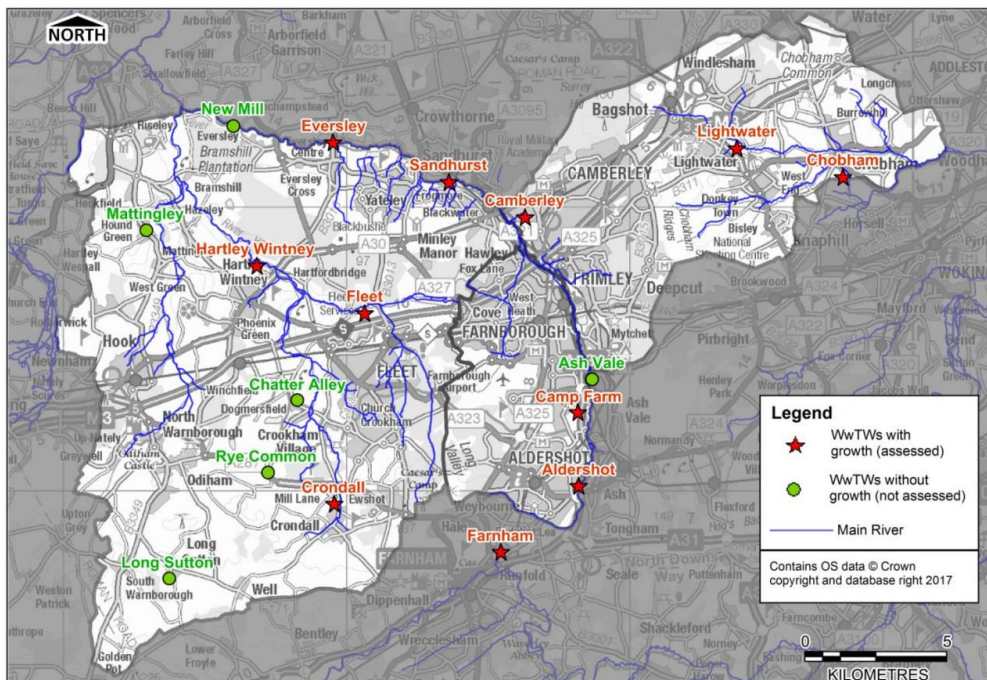
Water

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**).³⁸

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.

³⁸ **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>Pros of 20% BNG</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.³⁹ 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, CIEEM 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. Also, ze Ermgassen et al. (2021) 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 Biodiversity Metric, 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 Surrey Local Nature Recovery Strategy, 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>Cons of 20% BNG</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>Conclusion</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	=	=	

³⁹ 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.

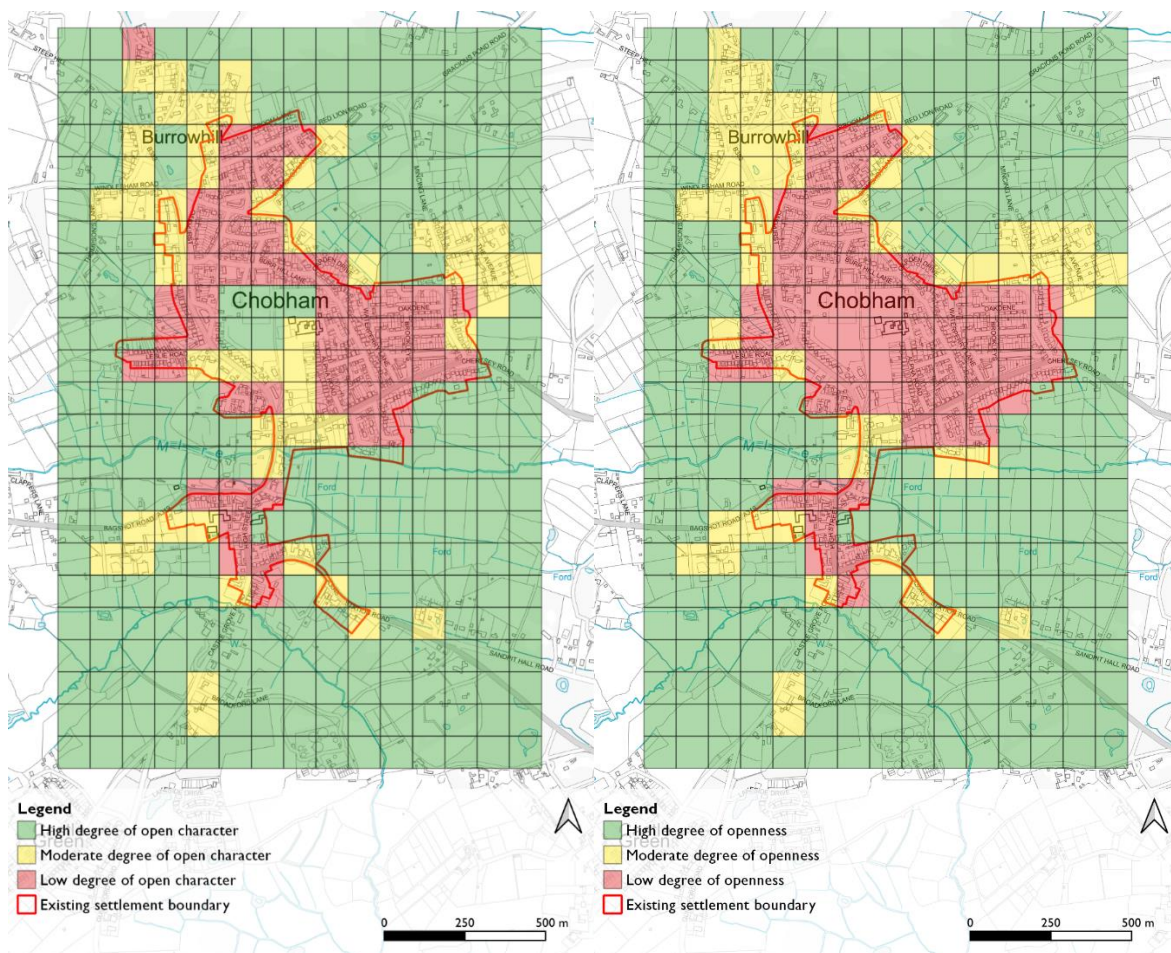
Appraisal findings were presented in Appendix III of the Interim SA Report (2022) and the appraisal findings from that stage broadly still hold true at the current time.

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.
Air / env quality	=	=	
Biodiversity	=	=	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.
Climate change adaptation	=	=	
Climate change mitigation	=	=	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.
Communities and health	=	=	
Economy and employment	=	=	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.
Heritage	★1	2	
Housing	2	★1	In conclusion , 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.
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

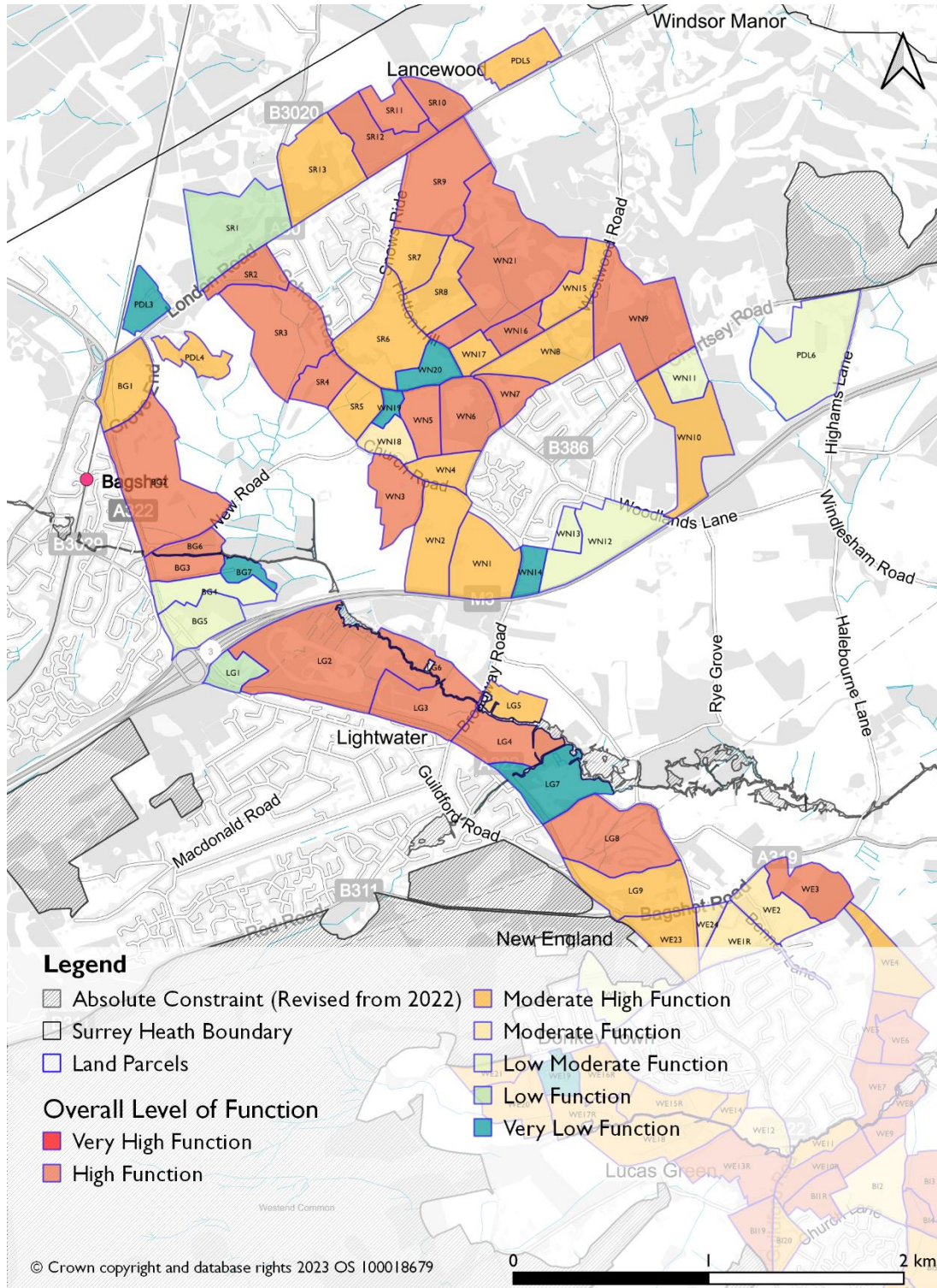


Figure B: Level of function map 2: West End and Bisley

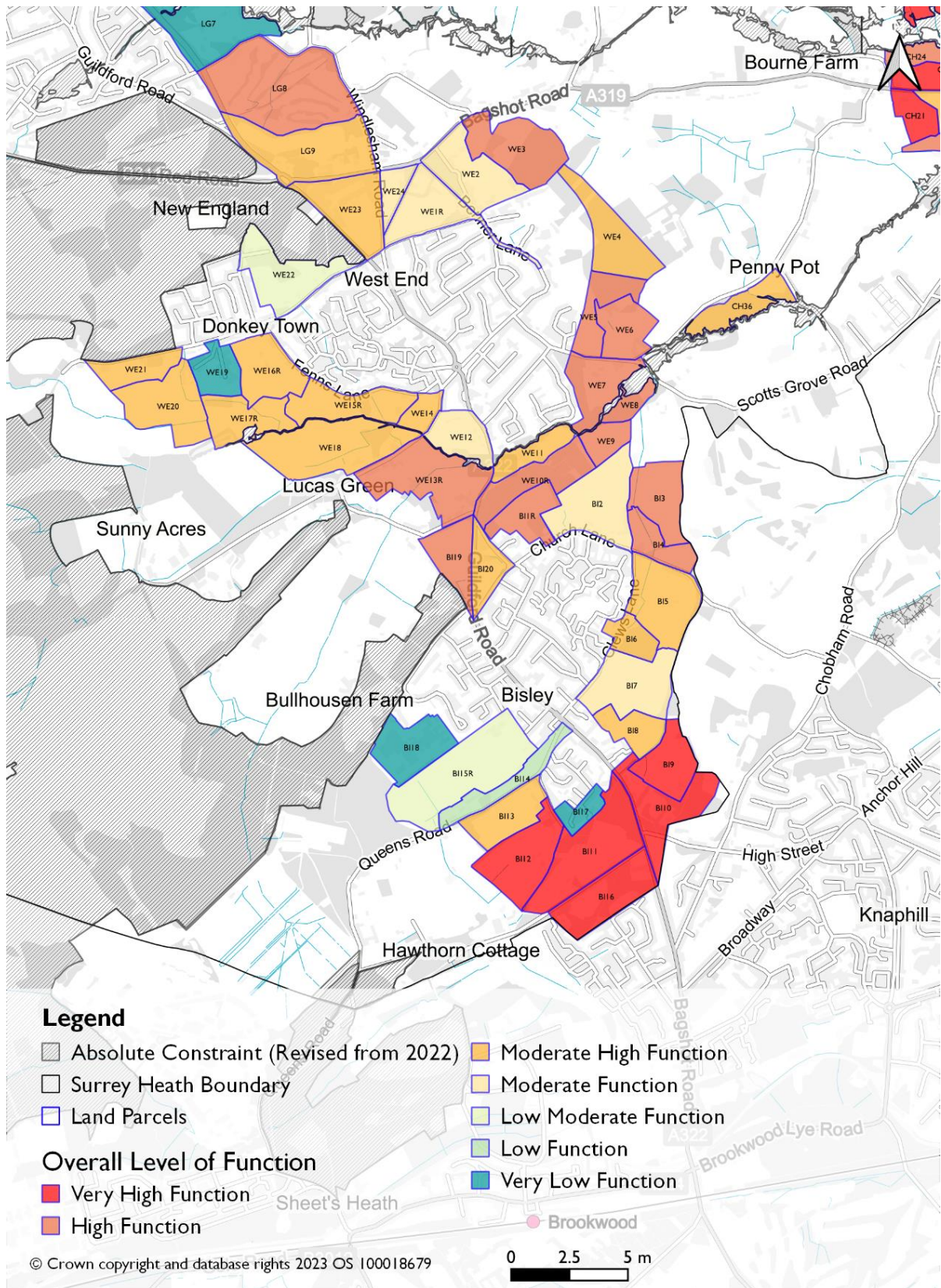


Figure C: Level of function map 3: Chobham

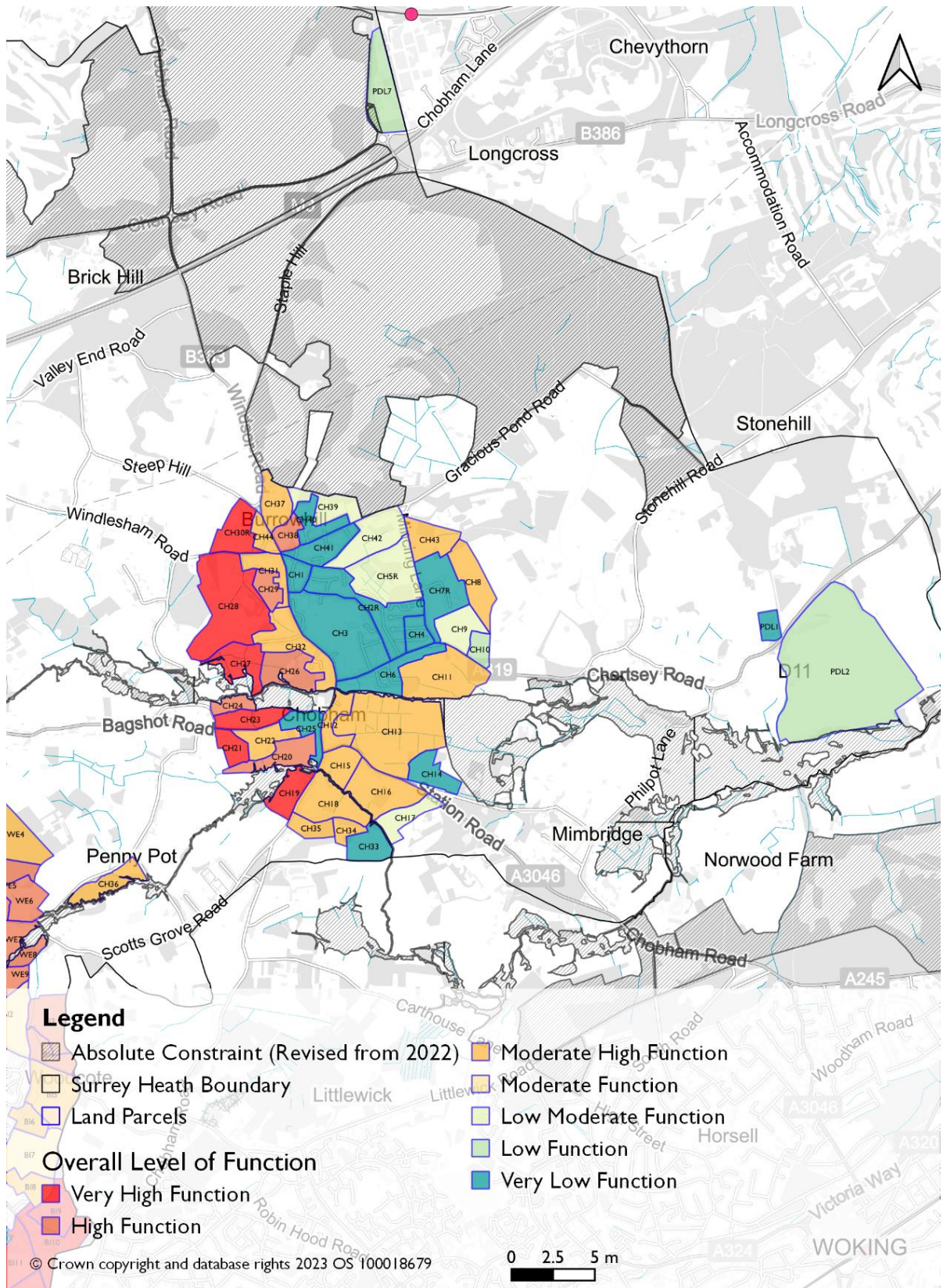
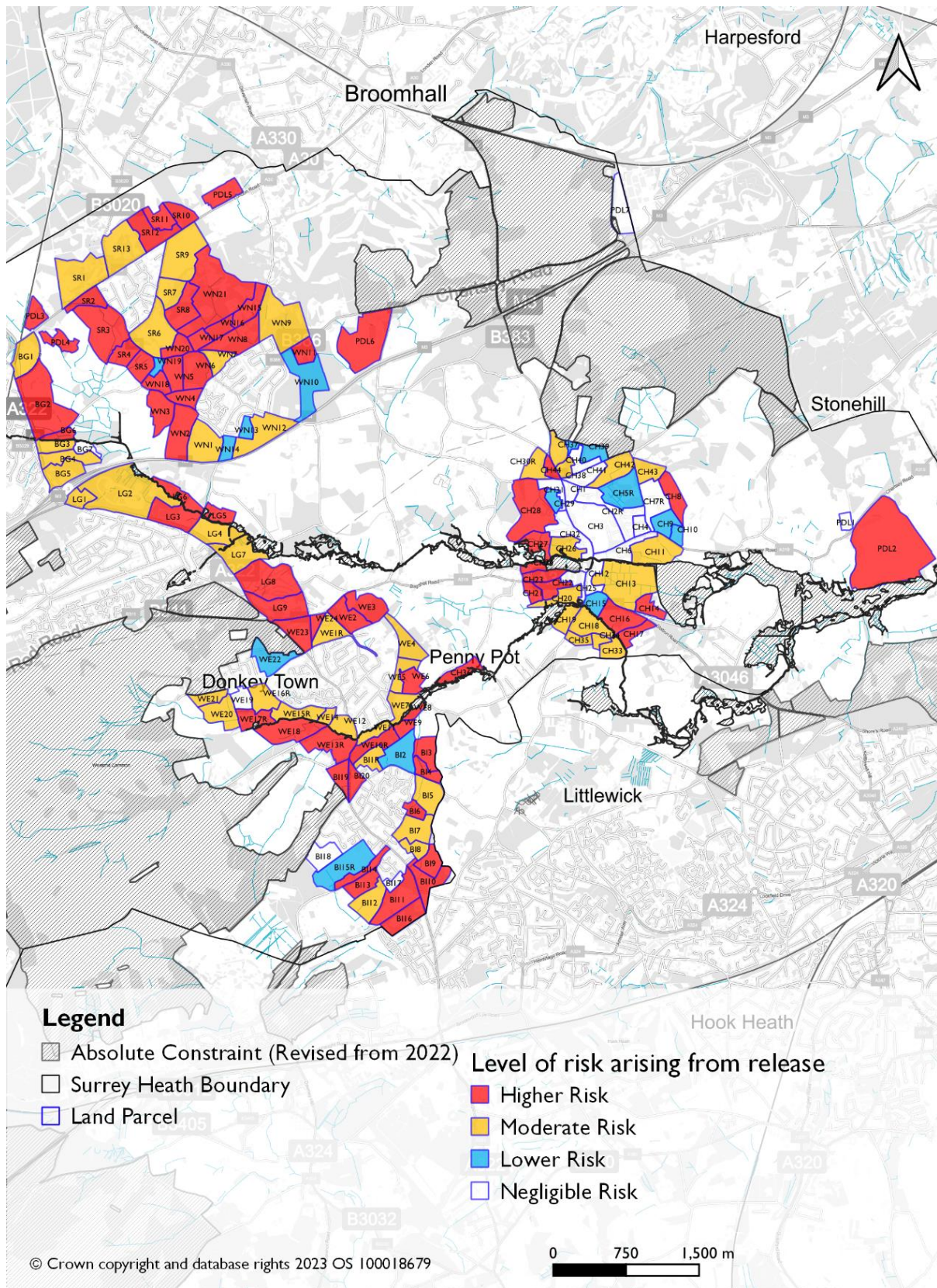


Figure D: The level of risk that would arise to the wider Green Belt if parcels were to be released



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 ⁴⁰	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.

⁴⁰ 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 2021/22,⁴⁰ 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**.

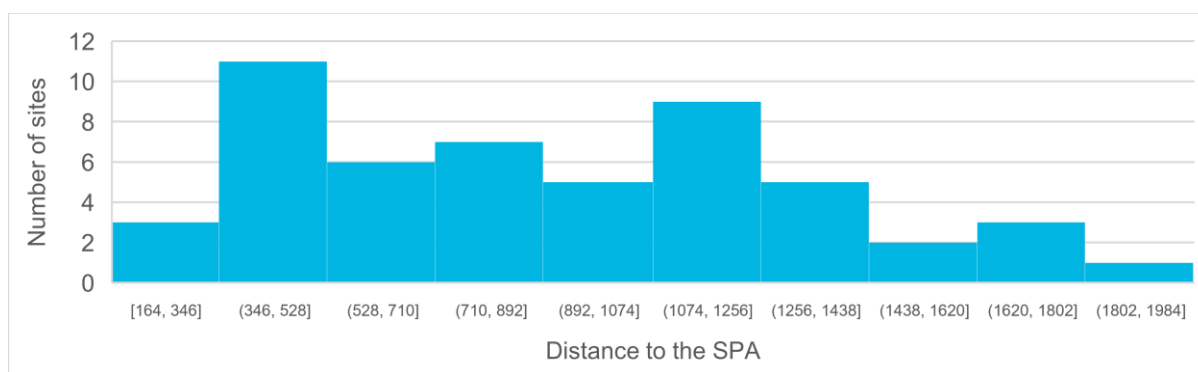
Beyond 400m there are well-established mechanisms in place to ensure that impacts on the SPA are avoided or suitably mitigated, including by ensuring sufficient Suitable Alternative Natural Greenspace (SANG) to avoid worsened recreational pressure on the SPA. Specifically, there is a requirement to provide 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 2021/22.⁴⁰

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).⁴⁰ 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.

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	
Bagshot																												
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	Red	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			
Bisley																												
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																								
902	Former Bisley FC	Shortlisted 2022	3.8	-																							
903	Land South of Church Lane	Shortlisted 2022	1.8	-																							
741	Land West of Guildford Road	Discounted	13	-																							
236	Land rear of 309-315 Guildford Road	Discounted	0.2	-																							
Camberley																											
814	London Road Block	Developable	2.6	524																							
27	Land east of Knoll Road ⁴¹	Developable	1.3	340																							
25	Camberley Station, Pembroke Broadway	Developable	0.4	150																							
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																							
21	61-63 London Road	Developable	0.3	32																							
801	Pinehurst, 141	Deliverable	0.8	32*																							
1005	St James House, Knoll Road	Developable	0.2	30																							

⁴¹ 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	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	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						

Page 448

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 ⁴²	Developable	0.4	-	Orange	Green	Orange	Green	Yellow	Green	Green	Green	Red	Green				Green	Green	Red	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 ⁴³	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			
Chobham																											
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

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

⁴³ 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	-																							
Deepcut																											
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	-																							
Frimley																											
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	-																							
Frimley Green																											
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	-																							
Lightwater																											
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	-																							
Mytchett																											
912	Land adjacent to Sherrard Way	Developable	4.0	16																							
1000	10 Willow Close	Developable	0.5	7																							
West End																											
178	Land east of Benner Lane ⁴⁴	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	-																							

⁴⁴ 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	-																							
Windlesham																											
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	-																							

Page 454

Sustainability Appraisal (SA) of the Surrey Heath Local Plan

SA Report
Non-technical Summary

Page 455

June 2024



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Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Surrey Heath Local Plan.

Once in place, the Local Plan will set a strategy for growth and change for the period to 2038, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA.

Central to the SA process is preparation of an SA Report for publication alongside the draft plan. At the current time, the SA report is published alongside the 'pre-submission' version of the Local Plan, under Regulation 19 of the Local Planning Regulations.

This is the Non-technical Summary (NTS) of the SA Report.

Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the SA?*

What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list provides a methodological 'framework' for appraisal.

Table A: The SA framework

Topic	Objectives
Accessibility [to community infrastructure]	<ul style="list-style-type: none"> 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
Air / env quality	<ul style="list-style-type: none"> Ensure air quality continues to improve in line with national and/or WHO global targets Reduce noise pollution
Biodiversity	<ul style="list-style-type: none"> Conserve and enhance the Borough's biodiversity Ensure the protection of the Special Protection Areas (SPAs)
Climate change adaptation	<ul style="list-style-type: none"> Minimise the risk of flooding Encourage reduced water consumption
Climate change mitigation	<ul style="list-style-type: none"> Reduce greenhouse gas emissions Increase energy efficiency and increase the use of renewable energy Encourage the use of more sustainable modes of transport (active and public) and reduce traffic congestion
Communities and health	<ul style="list-style-type: none"> 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

Topic	Objectives
Economy and employment	<ul style="list-style-type: none"> 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
Heritage	<ul style="list-style-type: none"> Protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
Housing	<ul style="list-style-type: none"> Meet identified housing need
Landscape	<ul style="list-style-type: none"> 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
Land, soils and resources	<ul style="list-style-type: none"> 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
Transport	<ul style="list-style-type: none"> Encourage the use of more sustainable modes of transport (public transport/cycling/ walking) and reduce traffic congestion
Water	<ul style="list-style-type: none"> Maintain and improve the quality of water resources Encourage reduced water consumption

Page 457

Plan-making / SA up to this point

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the SA Report explains work undertaken in 2023/24 to develop and appraise a reasonable range of “growth scenarios”, essentially alternative key diagrams.

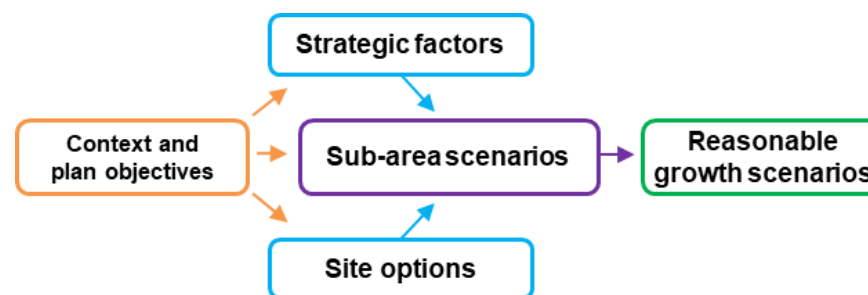
In short, the process involved:

- defining growth scenarios;
- appraising growth scenarios; and then
- feeding-back to inform the preparation of the draft plan.

Defining growth scenarios

The aim here is to explain the process of establishing reasonable growth scenarios for appraisal. Figure A provides an overview.

Figure A: Process overview



Context and plan objectives

Plan-making has been underway since 2017, with three formal consultations having been held prior to this current consultation, each with an associated Interim SA Report.

All evidence gathered to date, including through consultation and appraisal, fed into work to define reasonable growth scenarios for appraisal in 2023/24.

Plan objectives have twice been published for consultation, with minor adjustments made in response. The plan objectives are a key starting point for defining growth scenarios.

Strategic factors

There is a need to consider:

- **Quanta** (*how much?*) – 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 Local Housing Need (LHN), which is 321 dwellings per annum (dpa), but rather an adjusted average housing need figure of 294 dpa. This is due to the adopted Hart Local Plan providing for unmet needs from Surrey Heath.

As such, reasonable growth scenarios should be primarily focused on providing for 294 dpa in total. Given the extent of Green Belt and SPA constraints there is also a clear strategic justification for exploring lower-growth scenarios, subject to detailed consideration of capacity/supply options, as discussed below.

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, on the other hand, there are certain strategic arguments in favour of remaining open to the possibility of setting the housing requirement at a figure above 294 dpa.

The matter of precise quanta figures to reflect across the reasonable growth scenarios is returned to below, subsequent to consideration of broad spatial strategy, site options and sub-area scenarios.

- **Broad spatial strategy** (*where?*) – Section 5.2 of the main report presents a review of key evidence, in broad chronological order, beginning with a review of the Capacity Study prepared in 2018. As already mentioned, Surrey Heath is subject to significant constraints, which are a major influence on broad spatial strategy. However, there is also a need to consider growth opportunities, including town centre regeneration and the possibility of growth supporting wider ‘planning gain’. One important consideration, including in light of work to explore supply options over a number of years, is the possibility of supporting strategic sites suited to delivering new pitches / plots to help meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

Site options

The primary mechanism for considering site options in isolation is the Strategic Land Availability Assessment (SLAA) 2023 (published in March 2024). This identifies 50 sites as ‘deliverable’ (able to deliver within five years) or developable (able to deliver in the plan period, i.e. before 2038), whilst other sites are ‘discounted’.

Sub-area scenarios

This is a key section within the SA Report (Section 5.4). For each of 11 well-established sub-areas, the aim is to discuss all SLAA sites in turn, considering how they might be allocated in combination (‘sub-area scenarios’) in light of strategic factors, including an understanding of broadly how many homes are needed within the sub-area.

The conclusion reached is that for 10 sub-areas there is just one reasonable scenario, simply involving support for all deliverable/developable SLAA sites. However, for one sub-area, namely Chobham, it is also reasonable to progress two scenarios. Specifically, in addition to a scenario simply involving support for the deliverable/developable SLAA sites, it is also reasonable to explore a higher growth scenario involving additional allocation of Fairoaks Airport (Garden Village), which is located ~2km to the east of Chobham village.

Reasonable growth scenarios

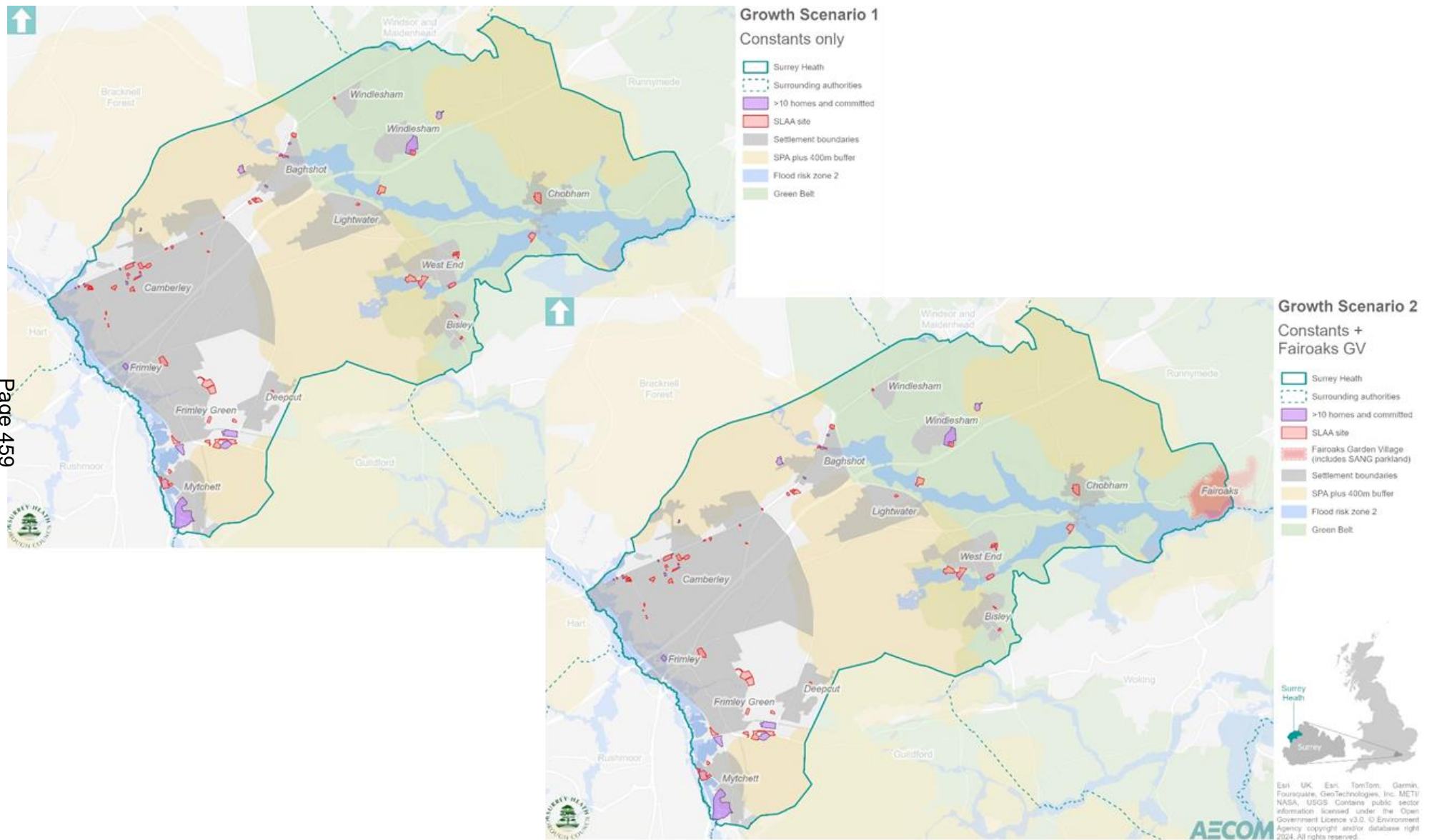
The final task is to combine sub-area scenarios to form reasonable growth scenarios for the borough as a whole. This is clearly a simple task in light of the preceding discussion of sub-areas. In summary, the borough-wide reasonable growth scenarios are:

- **Scenario 1** – the emerging preferred approach, involving support for all deliverable/developable SLAA sites, leading to a total supply ~8% above LHN.
- **Scenario 2** – additional allocation of Fairoaks GV; total supply ~26% above LHN.

N.B. it is typically seen as appropriate to identify a supply ‘buffer’ over-and-above the housing requirement, e.g. the supply buffer would be 8% under Scenario 1, assuming that the housing requirement is set at LHN.

Section 5.5 also presents a final ‘check and challenge’ regarding the possibility of other ‘reasonable’ higher and lower growth scenarios. With regards to lower growth, whilst there is a ‘strategic’ case, in light of supply options (i.e. deliverable/developable SLAA sites), such scenarios can be ruled-out as unreasonable. With regards to other higher growth scenarios, whilst the possibility of allocating one or more Green Belt urban extensions was explored in detail in 2022, at the current time any such scenario is ruled out as unreasonable. Finally, Section 5.5 concludes on scenarios involving additional support for employment land or pitches / plots, again finding such scenarios to be unreasonable.

Figure B: The reasonable growth scenarios



Page 459

Growth scenarios appraisal

Summary appraisal findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both rank the scenarios in order of performance and categorise the performance of each scenario in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.¹

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 of the main report).

With regards to **Scenario 2**, this scenario is preferable to Scenario 1 from a 'housing' and '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.

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, perhaps most notably a secondary school.
- Biodiversity – given the sensitive location of the site between two components of the Thames Basin Heaths Special Protection Area (SPA).
- Climate change mitigation – there are questions around both transport and built environment emissions.
- Transport – see the Highways Assessment Fairoaks Airport Sensitivity Test (2024).

¹ **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 B: Summary appraisal of the reasonable growth scenarios

SA topic	Growth scenario 1 Constants only	Growth scenario 2 Constants + Fairoaks
	Rank of preference and categorisation of effects	
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

The preferred growth scenario

It is not the role of the appraisal to arrive at a conclusion on which of the reasonable 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.

The following statement explains officers' reasons for supporting **Growth Scenario 1**:

"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 SPA), 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 below."

SA findings at this stage

Part 2 of the SA Report answers the question "what are appraisal findings at this stage" by presenting an appraisal of the Local Plan as a whole. The following is a summary.

Appraisal of the Draft (Pre-submission) Local Plan

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 the main 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.

There will be the potential to consider these appraisal findings further through the forthcoming examination in public, seeking to bolster positive effects and explore ways to address tensions with sustainability objectives.

A small number of specific recommendations are included within the appraisal; however, it is recognised that any changes aimed at improving the plan’s performance under one objective could have consequential effects on performance under other objectives.

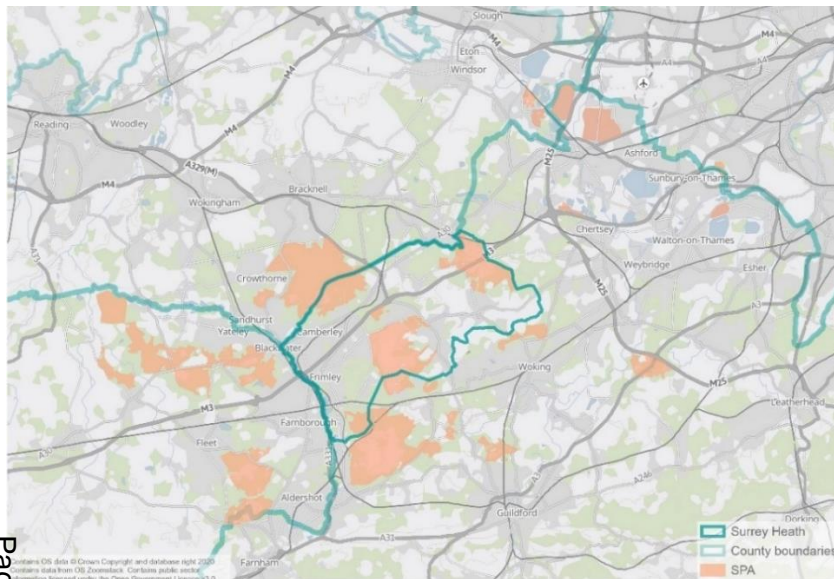
Cumulative effects

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’s housing market area links closely 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 (as discussed), 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 judged to be unreasonable.
- 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 above, 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.
- Transport corridors – the appraisal does not highlight any major growth-related issues or opportunities, in respect of either rail or strategic road corridors 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, including ahead of the forthcoming Surrey Local Nature Recovery Strategy (LNRS). Aside from matters relating to the TBHSPA and associated heathland and former heathland landscapes, a key consideration is potentially realisation of opportunities along the Blackwater Valley corridor.

Surrey Heath within Surrey and linking closely to Berkshire and Hampshire



Page 403

Chamberley town centre – an important centre in the sub-region



Next Steps

Submission, examination and adoption

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.

At examination one or more Government-appointed Inspectors will consider representations (and the SA Report) before identifying modifications necessary for soundness. Modifications will then be prepared and published for consultation.

Once found to be 'sound' the Local Plan will be adopted. At the time of adoption an 'Statement' will present information including "measures decided concerning monitoring".

Monitoring

Section 11 of the main report makes a number of suggestions for monitoring indicators / areas of focus, for example:

- 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, and then monitor effectiveness.
- Climate change adaptation – there is a need for clarity regarding flood zones under climate change scenarios, and it might 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 clarity, including so that the interested public can effectively scrutinise planning applications.
- Economy and employment – 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.

Housing – this is a key issue for monitoring, as reflected in the existing Authority Monitoring Report regime. There should be a renewed focus on monitoring affordable housing delivery by tenure split, including given limited recent social housing delivery. There is also a clear need to monitor Gypsy, Traveller and Travelling Showpeople accommodation needs, potentially in collaboration with neighbouring authorities.

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Regulation 18 Surrey Heath Draft Local Plan

The following tables set out a high level summary of the key issues or themes raised to the two Regulation 18 consultations carried out in 2022 and a summary of the changes that have been made in response.

Table 1: Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) Regulation 18 consultation March – May 2022

Summary of key issues raised	Changes made to the Local Plan
Section 1: Introduction and Context	
Vision and Objectives	
<p>There were comments of support for the Vision and a number of the objectives. Other comments sought changes including:</p> <ul style="list-style-type: none"> • additional reference to maintaining a national network of general aviation; • greater reference to the role of Fairoaks Airport, particularly in delivering economic growth, but also comments promoting the site for a new settlement; • references to electric vehicle infrastructure and to being in the top 5 best places to live; • improvements to the vision for Camberley Town Centre; • greater recognition of the role of the natural environment in reducing the effects of climate change; • More explicit reference to the needs of an ageing population. <p>Comments also suggested that there was not a positive approach to economic growth or meeting housing needs, and that all development needs should be met.</p> <p>Some comments considered that the housing quota was unrealistically high.</p> <p>A number of comments promoting new sites were also made against this section.</p>	<p>A number of minor changes are made to the Key Challenges and some updates have been made to the Context section.</p> <p>Reference to affordable housing has been added into Objective A and Objective B has been reworded to relate to economic development more widely.</p> <p>The part of the Vision relating to Camberley Town Centre has been updated to reflect the Corporate Town Centre Vision agreed by the Property Investment Working Group. Reference to the LEP has been removed.</p>
Section 2: Spatial Strategy	
Policy SSI: Spatial Strategy	
<p>There were comments of support for the approach to the location of new development and the focus for development in the west of the Borough as well as comments including:</p> <ul style="list-style-type: none"> • Hart District Council confirmed commitment to delivering 41dpa of unmet need from Surrey Heath; 	<p>In response to comments a number of changes have been made:</p> <ul style="list-style-type: none"> - Further amendments to the settlement boundary at Chobham - Removal of Longcross employment area from the Green Belt

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • Concern at the level of development in the villages; • Comments on the removal of Chobham village from the Green Belt including concerns about its removal and also suggested amendments to the settlement boundary; • Comments that the plan period should be longer and challenges to the timetable in the LDS; • Promotion of individual sites for development including Fair Oaks for a new settlement and related requests for changes to Green Belt boundaries and comments that there are exceptional circumstances with the Green Belt not being an absolute constraint; • Challenges to the housing requirement suggesting that it should be higher, but also local support for a lower requirement; • A higher housing requirement is justified through worsening affordability levels; • Challenges to different sources of supply including windfalls, the buffer and delivery from town centre sites; • Challenges to SLAA assumptions of capacity on individual sites; • Question the robustness of the evidence base; • Insufficient recognition of the ageing population; • Questions whether the duty to co-operate has been met; • Request for rewording reference to the Housing Market Area; • Comments that significant levels of flatted developments will not meet housing needs; • Concerns about reliance on key sites at Mindenhurst and Camberley Town Centre; • Requests for a specific Policy for Fair Oaks to support aviation uses and the need for greater recognition of the value of Fair Oaks to general aviation; • Request for removal of Longcross employment area from the Green Belt to be consistent with the part of the site in Runnymede; • Comments on Strategic and Locally Important Employment sites including the 	<ul style="list-style-type: none"> - Minor amendment to references to the HMA <p>A number of changes have been made to the housing allocations in Policy HA1 and the Policy and supporting text to SS1 has been updated to reflect the updated SLAA 2023 and the latest completion figures. Supporting text has also been updated to reflect the Employment Land Technical paper update, 2023 and the phasing out of LEPs.</p> <p>The LDS has been updated with a revised LDS adopted in March 2024. The timetable for the preparation of the Local Plan has been extended but the Plan period has remained the same.</p> <p>The housing requirement remains based on the standard method with unmet need to be met from within Hart District as agreed through their adopted Local Plan.</p> <p>Some changes have been made to the designation of Employment Areas as set out in response to other Policies. The part of Longcross employment area in Surrey Heath has been removed from the Green Belt.</p>

Summary of key issues raised	Changes made to the Local Plan
<p>need for greater emphasis on economic growth and site specific employment site comments;</p> <ul style="list-style-type: none"> • Should be greater focus on the east of the Borough/SANG capacity a constraint for the west of the Borough; • Inconsistent with the Windlesham Neighbourhood plan. 	
Policy SS2: Presumption in Favour of Sustainable Development	
<p>Some comments of support. Other comments objected or commented on the policy, making a range of detailed points including:</p> <ul style="list-style-type: none"> • concerns at the impact of prior approvals, • concern at the level of housing required, • not meeting the tests of soundness, and • the need to protect tree and flood zones and require solar panels and electric vehicle charging points. 	<p>Some minor changes made to the supporting text have been made for clarity.</p>
Policy SS3a: Climate Change Mitigation	
<p>There was general support for the approach to climate change and the requirement for Health Impact Assessments. Other comments included:</p> <ul style="list-style-type: none"> • clarification over 'green and blue' infrastructure; • the need to be aligned with Building Regulations; • consistency with national policy; • a requirement to show where materials are sourced, a request for greater detail and strengthening of some requirements; • specific reference to Fair Oaks; • identify additional needs for electricity generation; • greater emphasis on ecology and encouraging wind turbines. 	<p>Changes have been made to strengthen requirements for net zero development. A number of minor changes to the Policy and supporting text are made to reflect some of the comments made.</p>
Policy SS3b: Climate Change Adaptation	
<p>There was support for this Policy. Comments raised matters including:</p> <ul style="list-style-type: none"> • the need to recognise the role of the natural environment; • the need for certain adaptive measures to also be maintained; • the need for technology to catch up • the need to align with Building Regulations; and • the need for further detail on Severe Weather Management Plans. 	<p>Minor changes to the Policy or text are made in response to the representations including an additional criterion and supporting text relating to areas at risk of wildfires.</p>
Section 3: Housing	

Summary of key issues raised	Changes made to the Local Plan
Policy HA1: Site Allocations	
<p>Comments were received from a number of statutory consultees supporting the approach to allocations, and providing detailed comments raising matters including:</p> <ul style="list-style-type: none"> • Pleased to see fluvial flood risk has been considered; • Pleased to see the approach to heritage assets; • Promotion of specific sites, and comments regarding the retention of the library; • Site specific concerns; • Welcome sight of further evidence; <p>Other comments raised by respondents included:</p> <ul style="list-style-type: none"> • the relative merits of allocating particular sites for development, often expressed in relation to requests to allocate alternative sites; • concerns raised with particular sites that are allocated for development, in relation to the desirability, deliverability, traffic impacts and potential design and density of sites; • concerns raised with regard to the under-provision of specialist accommodation for the ageing population; • concerns raised with regard to the presentation of the information within Policy HA1; • the allocation of sites below the 25-dwelling threshold; and • challenging the Green Belt status of land at and adjoining Heathpark Drive. <p>A number of comments were made by the development industry regarding the approach to the housing requirement as being too low, and to perceived challenges in delivery. There were also challenges to the findings of the evidence base such as the Green Belt review. Other representors commented that the proposed housing requirement was too high.</p> <p>Some comments challenged the reliance on sites in Camberley Town Centre and the level of flatted developments and their contribution to meeting housing needs. It was also felt there was</p>	<p>The majority of the new sites proposed by representors are located within the Green Belt. The Council does not consider that exceptional circumstances exist to release land from the Green Belt for the purposes of residential development.</p> <p>Sites that currently benefit from planning permission have been removed from the site allocations policy, and a list of site allocations comprising development sites with identified capacities between 10 –24 new homes (gross) has been added.</p> <p>Amendments have been made to a number of site capacities and new sites included as part of the updated SLAA process, information from planning applications and pre-application discussions and Reg18 representations.</p> <p>Additional site allocations are made at St James House, Camberley; Land off Spencer Close, Frimley Green (former safeguarded transport site); Land At Loen, Deepcut; and 61 – 63 London Road, Camberley.</p> <p>A separate site allocation has been created for land at Portesbury School – this was previously part of the allocation under Policy HA3 Land East of Knoll Road.</p> <p>A new Policy (CTC4) has been added allocating Land east of Park Street, Camberley (formerly allocated for housing) for a mix of uses. This is no longer a proposed housing allocation.</p> <p>An additional criterion has been added to relevant site allocations requiring the consideration of biodiversity at an early stage in the planning process.</p>

Summary of key issues raised	Changes made to the Local Plan
inadequate regard paid to the Windlesham Neighbourhood Plan and general concerns about the impact of proposed new development on the villages in the Borough.	
Policy HA2: London Road Block	
<p>Comments welcomed the intention to regenerate the site and commented that the existing site was underperforming in a number of areas. Comments were positive with regard to the comprehensive redevelopment of the site and its likely impacts on the wider regeneration of Camberley Town Centre.</p> <p>Some comments questioned:</p> <ul style="list-style-type: none"> • the proposed maximum height of buildings at up to 15 storeys in certain places, • the bulk, scale and massing of the development being too intense, and • the projected phasing of the development and its delivery of new homes; • Traffic impacts; • The SANG solution for this site. 	<p>Further masterplanning and viability work has been undertaken on this site. This supports allocation of 550 (gross) new homes on the site.</p> <p>Having regard to the findings of the Local Plan Viability Assessment, 2024 an amendment has been made to the level of affordable housing to be provided from 40% down to 20%.</p> <p>A number of changes have been made to streamline the Policy and supporting text to avoid duplication and to ensure appropriate flexibility.</p>
Policy HA3: Land East of Knoll Road	
<p>Comments generally welcomed the allocation of the site, as part of the broader regeneration of Camberley.</p> <p>Other matters raised included:</p> <ul style="list-style-type: none"> • challenging the proposed amount of residential dwellings that could be accommodated; • questioning the over-reliance on flatted development in the spatial strategy (but in particular through the allocation of sites such as this); • questioning the impact of the Theatre on new development, and • concerns at the potential loss of Camberley Library, the Theatre, and the multi-storey car park; • concerns at access at Hillside. <p>Surrey County Council sought discussions regarding the potential retention of the library on the site.</p>	<p>The part of the site covering land at Portsebury School has been separated into a new Site allocation under HA1 as the County Council are bringing this site forwards in advance of the remainder of the site.</p> <p>Further masterplanning and viability work has been undertaken on this site. As a result the capacity of the site has been reduced to 340 new homes.</p> <p>Having regard to the findings of the Local Plan Viability Assessment and specific viability work for this site an amendment has been made to the level of affordable housing to be provided from 40% down to 25%.</p> <p>A number of changes have been made to streamline the Policy and supporting text to avoid duplication and to ensure appropriate flexibility.</p>
Policy HA4: Mindenhurst	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • Additional reference to early liaison by developers with Thames Water; • noted the site is in Flood Zone 1; 	<p>No changes are made to this Policy. Some updates to the supporting text are made to reflect the stage that the site has reached in construction.</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> the site should not be an allocation as it has permission; identified the need for links to Camberley Town Centre; and sought consideration of a new M3 access junction before development is approved 	
Policy H5: Range and Mix of Housing	
<p>Broad support for a balanced range and mix of housing to meet local needs. Matters raised included:</p> <ul style="list-style-type: none"> The threshold to provide self build plots should be raised from 20 to 40 or more dwellings; 5% self build is not justified; Class C2 extra care housing should be exempt from H5; Policy is not deliverable though the reliance on flatted development; Need viability and other evidence to ensure the policy is deliverable; and, Enhanced accessibility standards should be tested. 	<p>Some changes have been made to streamline the wording of the Policy.</p> <p>Text amended to clarify self build requirements and identify that plots may not be provided if justified by site characteristics or viability.</p> <p>Some amendments to the Policy have been made to clarify the requirements for homes to meet Building Regulations.</p> <p>The mix of housing sought as set out in the supporting text has been updated to reflect the Local Housing Needs Assessment 2024.</p>
Policy H6: Specialist Housing	
<p>Support for the policy with other matters raised including:</p> <ul style="list-style-type: none"> Questions the effectiveness of the Policy, should include specific needs; Need clarity on Use Class C2 and how it applies to various forms of specialist housing; Given the level of unmet need, extra care and other C2 uses should be enabled; Concerns about the number of care homes in certain locations; There should be reference to other forms of supported living, not just for older people; and, Affordable housing should not be sought. 	<p>The Local Plan Viability Study has assessed specialist housing on various sites, including the potential provision of affordable housing. As a result, an additional Policy criterion has been added into the Policy regarding the requirements for affordable housing.</p> <p>The Policy has also been updated to better reflect the typologies of specialist housing and supporting text updated to reflect evidence from the Local Housing Needs Assessment, 2024.</p>
Policy H7: Affordable Housing	
<p>Supportive comments that the Borough needs affordable housing with other matters raised including:</p> <ul style="list-style-type: none"> Affordable housing should not apply to Use Class C2/specialist housing/need to specifically test through the viability assessment; More housing sites should be allocated so that more affordable housing is delivered; No viability evidence to justify 40% affordable; 	<p>The Local Plan Viability Study, 2024 has assessed the viability of affordable housing on a range of site typologies and as a result some amendments to the Policy have been made. The Viability Study supports the retention of a requirement for 40% affordable housing other than where otherwise stated in site allocation policies or where the site is located in Camberley Town Centre and is for fully flatted development.</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • More First Homes should be sought to meet the needs of first time buyers; • Question the delivery of affordable housing needed based on the nature of the spatial strategy; • Criteria should be more flexible; • Total housing figures should be increased to deliver more affordable housing. 	<p>Reference is also added to Policy H6: Specialist Housing.</p> <p>The supporting text has been updated to reflect the findings of the 2024 Local Housing Needs Assessment and some changes have been made to the tenure mix that will be sought.</p>
Policy H8: Loss of Housing	
Support for the policy with other matters raised suggesting there should be stronger support for the retention of single storey homes due to the older demographic.	No changes to Policy or text.
Policy H9: Rural Exception sites	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • Support for small sites for people with a local connection and engaging with parish councils; • Adding affordable accommodation for gypsies and travellers not meeting the PPTS definition; • Allowing market housing will help to facilitate delivery/although also some support for it only to be sought in exceptional circumstances; and, • The local housing needs assessment should be robust. 	Additional text has been added to enable the use of rural exception sites outside defined rural settlement boundaries for affordable pitches for Gypsy and Travellers. Supporting text indicates that Gypsy and Traveller rural exception accommodation may be provided on Council-owned small, suitably located sites in rural areas.
Policy H10: First Homes Exception sites	
No comments received.	No changes
Policy H11: Gypsies, Travellers and Travelling Showpeople	
<p>Support for SHBC assessing traveller accommodation needs.</p> <p>Matters raised included:</p> <ul style="list-style-type: none"> • Insufficient pitches allocated to meet the identified needs, additional sites should be allocated; • Windlesham is an unsustainable location; • Sites need independent access routes, not via development sites; • Detailed comments on the layout/requirements on sites; • Comments on sites considered through the site identification process; • New sites should be identified in the west of the borough and avoid over concentration of pitches in one area with a number of comments concerned at the concentration within Chobham and Windlesham; 	<p>Introductory text has been revised to set out the Council's current position in respect of its Gypsy and Traveller needs.</p> <p>Text has been rationalised, re-ordered and in some cases criterion/Paragraphs have been removed to improve readability and address concerns regarding whether some of the requirements set out at R.18 could be demonstrated through the planning application process.</p> <p>New criterion have been incorporated confirming that development should not dominate the nearest settled community and that demand placed on local infrastructure should be accommodated within existing or planned infrastructure. A further criterion has been added that relates</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • Plan does not meet the full definition of Gypsy and Travellers; • Sites should be set away from the settled community; and, • Pitches should be included in strategic development sites. <p>A number of local authorities responded setting out that they are unable to assist with meeting any unmet needs and raising some concerns about cross boundary impacts if needs are not fully met.</p>	<p>specifically to requirements for Travelling Showpeople Yards.</p> <p>Main policy text has been updated to incorporate reference to very special circumstances and to clarify the cases in which larger developments will not need to provide Gypsy and Traveller or Travelling Showpeople provision.</p> <p>Supporting text has been updated to set out how the consideration of very special circumstances will be made in more detail and how the occupation of sites will be conditioned.</p>
Policy HI2: Site Allocations for Gypsies, Travellers and Travelling Showpeople	
<p>Objections from local groups and numerous local residents. Concerns include:</p> <ul style="list-style-type: none"> • Loss of/impact on public footpaths/bridleway; • Loss of SANG; • Loss of trees, wildlife habitats and green corridor; • Detrimental impact on character and surrounding properties; • Increase in noise and air pollution; • Pressure on road network and infrastructure; • Access issues; • Loss of community facilities 	<p>Updated to remove Diamond Ridge Woods, Camberley, Bonds Drive Extension, Chobham and Broadford Lane, Chobham as allocations, following more detailed feasibility work.</p> <p>Swift Lane is retained as an allocation for 5 additional pitches with updated criteria.</p>
Section 4: Town Centres, Retail and Economy	
Policy CTCI: Camberley Town Centre	
<p>There were comments of support. Other matters raised included:</p> <ul style="list-style-type: none"> • seeking recognition of the need for improvements to other centres; • seeking increased emphasis on mixed use developments; • concerns that significant numbers of flatted developments will not meet future housing needs; • concern that there is no certain SANG solution; • support for relocation of the Theatre so long as no loss of quality or capacity; and, • additional reference is made to stakeholder engagement. 	<p>Some minor changes to the Policy and text have been made to provide greater clarity and to include further reference to stakeholder engagement.</p> <p>Reference has been added to supporting proposals in the Surrey Heath LCWIP.</p>

Summary of key issues raised	Changes made to the Local Plan
Policy CTC2: Primary Shopping Area	
There were comments of support for this Policy.	Minor wording updates are made to improve clarity and provide factual updates.
Policy CTC3: Movement and Accessibility	
<p>Comments supported this Policy, with other matters raised including:</p> <ul style="list-style-type: none"> • seeking improved transport links with the villages; and, • suggestions that recent public realm improvements had not improved the experience for pedestrians. 	<p>Minor wording updates are made to improve clarity and provide factual updates. Reference has been added to supporting proposals in the Surrey Heath LCWIP.</p>
Policy ERI: Economic Growth and Investment	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • the need to update the evidence-base to reflect the Covid-19 pandemic; • the addition or removal of specific key sectors set out under criteria (3) including adding aviation and film and television industries; • requests for the removal of the Longcross site and Fair Oaks employment area from the Green Belt. • The promotion of mixed use developments and greater flexibility; • Concerns that the Plan was not positively prepared in relation to employment needs; and the need for additional employment land. 	<p>The supporting text has been updated to reflect the updated Employment Land Technical Paper 2023 and Employment Capacity Study 2023, which takes account of impacts of Covid-19 pandemic and takes account of the contribution of recent permissions towards supply position.</p> <p>An additional criterion has been added regarding support for new employment uses outside the defined Employment areas.</p> <p>Longcross is to be removed from the Green Belt.</p> <p>Minor wording updates are made to improve clarity and provide factual updates, including the transfer of LEP functions to SCC and the updated Surrey Heath Economic Development Strategy.</p>
Policy ER2: Strategic Employment Sites	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • The redesignation and amendment of sites including Knoll Road, Longcross and Fair Oaks Airport; • Many designated sites are close to main rivers and there is no evidence that additional employment floorspace can be acceptably accommodated having regard to the constraint of flood risk; • Promotion of a site in Admiralty Park for employment use; • The need to update the employment evidence to reflect the current market and future demand; • promotion of Watchmoor Park for regeneration. 	<p>Having regard to the allocation of St James House, Knoll Road, as a housing site (Policy HAI) and the impact on the character of the Camberley Town Centre Strategic Employment Area this designation has been deleted.</p> <p>Longcross is retained as a Strategic Employment site but removed from the Green Belt.</p> <p>Fair Oaks Airport and Chobham Business Centre has been redesignated from a Locally Important Employment site to a Strategic Employment site. An additional paragraph has been added in the supporting text</p>

Summary of key issues raised	Changes made to the Local Plan
<p>Concern was also raised about the impacts of additional development on roads in Windlesham, especially combined with the impact of Longcross.</p>	<p>regarding the role of Fairoaks as a general aviation airport.</p> <p>Mytchett Place is redesignated from a Strategic Employment Site to a Locally Important Employment Site.</p> <p>Additional analysis has been conducted to take account of the extent to which potential employment growth areas lie within flood risk zones, demonstrating that many opportunities are not within the functional floodplain (FRZ3b). A new Policy relating to Watercourses has been included (Policy E7) which gives additional support to addressing flood risk including within employment areas.</p>
Policy ER3: Locally Important Employment Sites	
<p>In addition to comments ER1 and ER2 above, there was general support for the aims of the Policy protecting employment uses on these sites, with other matters raised including:</p> <ul style="list-style-type: none"> • some concerns at the effectiveness of the Policy in achieving this overall aim; • concerns that it was not positively prepared; • seeking the re-designation of Fairoaks as a strategic employment site; • the need to protect sites from conversion to residential; • the specific importance of maintaining a national network of general aviation airfields should be recognised; and • concerns that the Policy did not specifically protect Fairoaks for airport use. 	<p>Minor changes are proposed to this Policy which are the redesignation of Fairoaks Airport and Mytchett Place outlined above in Policy ER2.</p> <p>In relation to flood risk concerns referred to in Policy ER2, the designated employment area within the SC Johnson (Locally Important Employment site) site has been amended, to include a larger area of the site to provide greater scope for addressing flood risk concerns in any future redevelopment of the site.</p>
Policy ER4: Yorktown Business Park	
<p>Comment received promoting a site at Admiralty Park with suggested amendment to policy wording.</p>	<p>Policy has been renamed to include Watchmoor Business Park.</p> <p>Some amendments to the supporting text reflecting the updated evidence base have been made as well as text recognising the designation of this site in the Surrey Waste and Minerals Local Plan.</p>
Policy ER5: Rural Economy	
<p>Matters raised included:</p>	<p>Some minor word changes are made to Policy ER5 to clarify the need to protect rural character and to better define local</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • strengthening the Policy to ensure protection of rural character and local amenity; • concerns regarding the introduction of inappropriate employment uses and the impacts of matters such as traffic, noise and light pollution; • reference to the value of equestrian development to the economy; • reference to previous issues of enforcement; • reference to employing only local workers in unsustainable locations; and • concerns regarding the loss of rural businesses to residential use. 	<p>amenity as well as strengthening the justification for new buildings.</p>
Policy ER6: Frimley Park Hospital	
<p>Comments were received supporting the principle of the allocation with other matters raised including:</p> <ul style="list-style-type: none"> • a request that either through an amendment to this Policy or a new Policy support is given for additional healthcare facilities to be provided on other sites in the catchment; • Flexibility is sought regarding the need to balance technical requirements against the Borough’s health infrastructure requirements; and, • Wording sought supporting development proposals where they reflect the likely future demands of Borough residents. 	<p>Additional wording has been added to the Policy and supporting text regarding support for healthcare facilities elsewhere in the Borough and making minor amendments to the wording for technical requirements. The criterion relating to biodiversity net gain has been deleted as this is covered elsewhere in the Plan.</p> <p>Additional supporting text has been added regarding the announcement that FPH will be part of the new Hospitals Programme.</p>
Policy ER7: Edge of Centre and Out of Centre Proposals	
Comments of support were received.	No changes
Policy ER8: District and Local Centres	
<p>Comments of support were received as well as other matters raised including:</p> <ul style="list-style-type: none"> • concerns regarding the impacts of permitted development and the need for Article 4 Directions; • the need to ensure premises are accessible; • Objection as it doesn’t support delivery of a local centre at Fair Oaks; and • comments on specific centres including the redesignation of Windlesham to a Neighbourhood Parade. 	<p>An additional criterion has been added setting out how applications within the Primary Shopping areas will be considered.</p>
Policy ER9: Neighbourhood Parades	
Support for the Policy as well as:	No changes

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • concern regarding the impact of permitted development; • the need to include cycle parking; and • disappointment there was nothing more specific for Heatherside Parade. 	
Policy ERI0: Old Dean	
No comments were received to Old Dean Policy.	Some amendments to improve clarity in relation to the Thames Basin Heaths Special Protection Area have been made to the supporting text.
Section 5: Infrastructure	
Policy IN1: Infrastructure Delivery	
<p>Comments of support with matters raised included:</p> <ul style="list-style-type: none"> • additional text sought relating to phasing and developer engagement with Thames Water; • a new Policy sought on wastewater infrastructure; • Comments outlining the impacts on health provision and seeking financial contributions from all housing developments where S106 agreements apply; • Site specific comments on infrastructure capacity issues including highway issues; • General concerns about existing infrastructure capacity across the Borough and insufficient new provision alongside new developments; • The need for greater emphasis on cycling and walking routes; • Updates to the Infrastructure Delivery Plan sought to reflect the allocation of Fair Oaks; • Comments on wording on education provision; • the need for phasing; and • reference to the Government's proposed changes to S106 and CIL. 	<p>Amendments to the Policy and supporting text have been made regarding phasing and wastewater infrastructure. Following comments from Surrey County Council the paragraph relating to education infrastructure has been reworded. The supporting text relating to the Infrastructure Levy has been updated to reflect the latest position.</p>
Policy IN2: Transportation	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • Some suggested additional document references; • the need to consider rail accessibility and capacity; • the need for greater emphasis and delivery of improved cycle and pedestrian infrastructure; 	<p>A number of minor changes are made to supporting text including adding reference to recent Building Regulation changes for electric vehicle charging, and additional references to Surrey County Council documents as well as reference to other users such as horse riders.</p> <p>An additional Policy criterion has been added to reflect the need to support</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • concern regarding the impacts of development on specific places including Windlesham and Chobham; • the need to reflect equestrian needs; • the transport benefits of development at Fair Oaks; • comments regarding electric charging points including the need to reflect changes to Building Regulations; and • concerns at grid capacity. 	<p>improvements identified in the emerging Surrey Heath Local Cycling and Walking Infrastructure Plan.</p> <p>Text has also been updated to reflect the adoption of the Local Transport Plan.</p>
Policy IN3: Digital Infrastructure	
<p>Support for the Policy with matters raised included;</p> <ul style="list-style-type: none"> • highlighting the importance of high-speed broadband access in rural areas; • needing to ‘future-proof’ the policy as technologies may change over the lifetime of the plan; • ensuring that new communications infrastructure does not detriment the network capacity for the existing community; and • ensuring that new telecommunications infrastructure is designed well. 	<p>In the light of new Building Regulation requirements relating to the delivery of high speed digital connections to new homes criterion 2 of the Policy has been deleted and the Policy and supporting text updated accordingly.</p>
Policy IN4: Community Facilities	
<p>Support for the Policy with matters raised including:</p> <ul style="list-style-type: none"> • the addition of a separate policy or SPD for public houses; • the need for more detailed requirements for permitting a change of use; • concerns over existing capacity; • support for increased facilities; and • for views of the local community to be given strong weight. 	<p>Minor wording amendments to criterion I to strengthen wording on opportunities for multifunctional community facilities. The supporting text has also been updated to reflect comments from infrastructure providers in preparing the Infrastructure Delivery Plan (2024).</p>
Policy IN5: Green Infrastructure	
<p>Support for the Policy with matters raised including;</p> <ul style="list-style-type: none"> • Suggestions to include specific definitions for blue infrastructure; • The requirement for a strategic approach to green infrastructure; • The need to reflect equestrian needs; • Concerns and questions relating to the provision of SANG; and, • Concern over potential for major development to negatively impact existing green infrastructure networks. 	<p>Introductory text has been amended to reflect latest guidance from Natural England. Wording has been strengthened in criterion 2 of the policy to require development proposals to demonstrate new and enhanced green infrastructure.</p> <p>Following the introduction of the Green Infrastructure Framework, launched by Natural England in January 2023, a new paragraph has been added to the supporting text to provide an overview of the framework and its key components.</p>

Summary of key issues raised	Changes made to the Local Plan
	<p>Supporting text has been amended to remove unnecessary text and provide clarity on types of areas that contribute to green infrastructure.</p> <p>It has also been updated to include reference to the Local Nature Recovery Strategy and the list of references to relevant Local Plan evidence base removed, noting that the list is not exhaustive and will likely develop during the Plan period.</p>
Policy IN6: Green Space	
<p>Support for the Policy with matters raised including;</p> <ul style="list-style-type: none"> • Request for acknowledgement of exceptions to Policy IN6, giving the example of school expansion into playing fields; • strongly encouraging the Council to undertake a new Playing Pitch Strategy; • Objection to the proposed deletion of the Chobham Rugby Club Green Space designation; • Suggestion that Lion Park Sports Ground should not be allocated. • Broad support for the majority of sites proposed for allocation; • Suggestions for sites to be either added or amended to include a different site area; • Request for greater protection afforded to the footpath and bridleway network, and opportunities for enhancement to be maximised. 	<p>Minor amendments made to improve clarity and a new criterion added to identify the need for development proposals to provide appropriate open space in accordance with adopted standards. Supporting text is updated to note that an updated Playing Pitch Strategy has been prepared and also note that new open space should also support and enhance the existing rights of way network.</p>
Policy IN7: Indoor and Built Sport and Recreational Facilities	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • suggested policy wording updated to make clear that a robust assessment is relied upon in determining that there is no longer a need for the existing facilities. 	<p>Policy wording has been amended to make clear that a robust assessment is relied upon in determining that there is no longer a need for the existing facilities. Minor amendments made to the supporting text.</p>
Policy IN8: Safeguarded land for future Transport Provision	
<p>Representations were received from the beneficiaries of the covenant on this land suggesting that no scheme is deliverable drawing on evidence from the 2016 Camberley Rail Assessment.</p>	<p>The allocation as safeguarded land for future transport use has been deleted and the site is now allocated for housing in Policy HA1.</p>

Summary of key issues raised	Changes made to the Local Plan
<p>Network Rail also responded confirming that they have no intention to implement any scheme as it is not feasible and identifying proposals to construct a footbridge over the railway at this point.</p> <p>Other comments supported the retention of this safeguarding for future rail improvements.</p>	
Section 6: Environment	
Policy E1: Thames Basin Heaths Special Protection Area	
<p>Comments of support with matters raised including:</p> <ul style="list-style-type: none"> • insufficient SANG would be a soundness issue for the Plan and further work is needed before adverse effects on the TBHSPA can be ruled out; • Comments on the approach to development in the 400m buffer zone; • Concerns raised on the impacts of development at Longcross; and, • general queries on SANG capacity and the promotion of sites for SANG or with a SANG element. 	<p>No changes have been made.</p>
Policy E2: Biodiversity and Geodiversity	
<p>Support for the Policy with matters raised including:</p> <ul style="list-style-type: none"> • the Policy could be more positively worded; • suggest add reference to 'enhancing'; • the need to ensure Policy is supported by up to date evidence; • the need to add reference to the forthcoming Local Nature Recovery Strategy. 	<p>Some minor changes to the Policy and text have been made to add clarity including reference to the Local Nature Recovery Strategy and new text noting that all aquatic habitats should be treated as priority habitats.</p>
Policy E3: Biodiversity Net Gain	
<p>General support with matters raised including:</p> <ul style="list-style-type: none"> • general concern and objection from developers that the standard should not be higher than the national requirement of 10% and associated concerns with viability; • support for the 20% requirement; 	<p>Additional text added to supporting text to justify the policy in terms of need, deliverability of local offsite compensation and viability of development. Additional requirement for offsite site gains to be delivered in line with hierarchy of proximity to site.</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • detailed comments on the provision of BNG; and, • further detailed clarification by representors on a number of points. 	<p>Supporting text has been updated to reinforce this and make reference to the Thames Basin Heaths National Character Area. A number of other minor changes have been made for the purposes of clarity and alignment with national legislation and new Planning Policy Guidance. Additional references to the Local Nature Recovery Strategy.</p> <p>Minor amendments to Policy wording to provide clarity on the 20% net gain requirement and on long term management of net gains as well as additional links to other wider Strategies.</p>
Policy E4: Pollution and Contamination	
<p>Support for the Policy with matters raised included:</p> <ul style="list-style-type: none"> • the need for a robust system of monitoring in relation to air quality; • the need for an Air Quality Assessment to be made before detailed comments can be provided; • provision of an Air Quality Statement for Fair Oaks showing development at the site is achievable in compliance with national policy; • concerns about pollution and air quality in Windlesham; 	<p>A new policy criterion is introduced to clarify that planning obligations will be used to secure contributions to tackle poor air quality and/or for air quality monitoring, to assist with funding monitoring and enforcement.</p> <p>Additional text has been added to strengthen the requirement for an assessment of possible impacts, as well as a new criterion for major developments to provide a Demolition and/or Construction Management Plan. A number of other minor changes have been made for the purposes of clarity.</p>
Policy E5: Renewable and Low Carbon Energy Systems	
<p>Support for the Policy with matters raised including:</p> <ul style="list-style-type: none"> • the need to test the Policy as part of the Whole Plan Viability assessment; • queries relating to the thresholds; and • Not positively formulated and is unsound; 	<p>Amendments made to require major development proposals to meeting the 25% requirement against the developments regulated operational energy needs. Supporting text amended to strengthen wording on the importance of delivering renewable energy.</p> <p>Supporting text updated to set expectations for the provision of an Energy Statement for major development detailing how renewable energy generation has been optimised. A number of other minor changes have been made for the purposes of clarity.</p>
Policy E6: Flood Risk and Sustainable Drainage	
<p>Support for the Policy with matters raised including:</p>	<p>Text amended throughout policy to reference all sources of flooding.</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • Detailed comments and suggested wording changes from statutory consultees, mainly seeking to strengthen the wording and providing greater clarity on requirements; • General concerns that residents' experiences of flooding were not being considered as part of the process; • Concerns that desk based assessments do not reflect the situation on the ground; • Seeking a policy preventing the culverting of main rivers; and • concerns raised with basement development and greater emphasis sought on surfaces to be absorbent. 	<p>Policy text strengthened and additional text added relating to restoring areas of functional floodplain and creating green infrastructure opportunities.</p> <p>Further requirements added to identify opportunities for Natural Flood Management and new basement development.</p> <p>A number of wording changes to policy and supporting text following feedback from the Environment Agency and Surrey County Council.</p> <p>In response to representations from the Environment Agency regarding the inclusion of a new rivers Policy a new Policy is added to the Plan (Policy EN7: Watercourse and Water Quality).</p>
Policy E7: Landscape Character	
<p>Support for the Policy with one objection raised:</p> <ul style="list-style-type: none"> • Objection as landscape character is already protected by other designations. 	<p>No changes are made.</p>
Section 7: Green Belt and Countryside	
Policy GBCI: Development of New Buildings within the Green Belt	
<p>Support for the Policy with matters raised including:</p> <ul style="list-style-type: none"> • More clarification should be provided on issues such as temporary buildings, agricultural dwellings, very special circumstances, basements and permitted development fall back positions; • Tighter restrictions should be placed on the re-development of previously developed land and infill development; • Infill development should not be acceptable beyond the suggested reviewed Chobham Village boundary; • Specific comments about the assessment of land parcels in Windlesham; • How the 30% figure should be applied is unclear; • Object and consider that some of the wording is inconsistent with the NPPF; • Consider that there are exceptional circumstances which warrant an 	<p>The 'materially larger' percentage set out in supporting text has been lowered from 30% to 15% and clarity has been provided in respect of how "materially larger" should be assessed.</p> <p>A new paragraph has been introduced to reflect that in order to be assessed against the 'substantial harm' test for the redevelopment of previously developed land, schemes would need to demonstrate the need for the affordable housing and would be expected to comply with the affordable housing requirements set out in Policy H7.</p> <p>A number of other changes to the supporting text have been made for clarity and a new Paragraph introduced to address buildings to support habitat management for nature recovery.</p>

Summary of key issues raised	Changes made to the Local Plan
<p>alteration to Green Belt boundaries; and,</p> <ul style="list-style-type: none"> • Green Belt boundaries should be revised to enable housing delivery. 	
Policy GBC2: Development of existing buildings within the Green Belt	
<p>Policy supported with matters raised in the representations received include:</p> <ul style="list-style-type: none"> • Further emphasis should be placed on the removal of permitted development rights; • Clarification that temporary buildings should be excluded from calculations sought; • Object as repeats NPPF; • Reference should be made to strategic employment sites; • How the 30% figure should be applied is unclear. 	<p>The text has been revised to better align Policy with the NPPF.</p> <p>Text has been updated to provide increased emphasis on volumetric approach to assessing suitability of schemes in main Policy text and supporting text and associated removal of reference to floorspace.</p> <p>Changes made to provide clarification that temporary buildings should be excluded from calculations.</p> <p>Supporting text updated to indicate how basements will be addressed and the introduction of new text to better reflect the standard planning condition that the Council uses when it removes permitted development rights on Green Belt schemes.</p>
Policy GBC3: Equestrian Uses in the GB and CBGB	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> • Previous equestrian policy (DM3) required new buildings or ancillary development to be small in scale. The use of “suitable” (GBC3(1)c) is subjective and represents a weakening of policy; • Paragraph GBC3(1)f should be expanded to include reference to accessibility to common land. • Loss of existing equestrian sites should be resisted; • The role equestrian use can play in individuals’ health and wellbeing should be recognised 	<p>Paragraph GBC3(1f) has been expanded.</p> <p>Text related to the health benefits of equestrianism has been inserted into supporting text.</p>
Policy GBC4: Development within the Countryside beyond the Green Belt	
<p>Matters raised included:</p> <ul style="list-style-type: none"> • Query why rural workers also not covered in Green Belt section; • Specific Green Belt boundary queries 	<p>The title of the Policy is updated for clarity. Policy GBC4 is updated to incorporate new criterion to reflect that sites allocated in HAI are permissible within the Countryside, that provision of Gypsy and Traveller or</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> Specialist housing should be added as criterion within GBC4. 	Travelling Showpeople Sites that meet identified needs will be permissible and that new development should be proportionate to both site and setting. Supporting text has been updated accordingly.
Policy GBC5: Gordons School	
Historic England support this Policy. No other comments were received.	Supporting text updated to reflect completion of new facilities.
Section 8: Design and Heritage	
Policy DH1: Design Principles	
Matters raised included: <ul style="list-style-type: none"> wording changes that would protect the identity and character of Chobham; Concerns at the impact of permitted development and request for Article 4s; Connectivity should also include equestrianism; Health of residents and character of villages must be preserved; and, the need to reflect site constraints including utilities and to co-ordinate works by utilities. 	Additional Policy wording regarding the need for a comprehensive approach to development has been added. A new introductory Paragraph has been incorporated to emphasis the benefits of high quality design. In addition, new criterion have been added into the main Policy text relating to back land development. A number of other minor changes have been made for the purposes of clarity.
Policy DH2: Making Effective Use of Land	
Comments of support with other matters raised including: <ul style="list-style-type: none"> the need for some flexibility and clarity that the densities are targets; discouragement of backland development; some specific densities queried; question the 800m walking distance from Bagshot. 	The minimum net density for sites within 800m walking distance of railway stations has been revised down from 70dph to 60dph.
Policy DH3: Residential Space Standards	
Comments of support with other matters raised including: <ul style="list-style-type: none"> suggest adding further standards on e.g. outdoor utility space, parking, cycle storage and residential garden space; need to support the standards with robust evidence and test through viability; questions consistency with the Windlesham Neighbourhood Plan; 	No changes.

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> • support for exceeding the standards; • identify the need for flexibility particularly in relation to major development proposals. 	
Policy DH4: Sustainable Water Use	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> • request to strengthen the grey water recycling requirements; • the need to monitor water consumption post occupation; • suggest the standard should be a minimum; • suggest a standard water efficiency condition applied to all new residential development; 	<p>Policy wording has been amended to clarify the requirements for rainwater storage and to set the 110 litres per person per day as a maximum.</p> <p>Supporting text is updated to clarify that the standard will be required by condition and that a fittings based approach should be used to determine water consumption.</p>
Policy DH5: Trees	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> • concern that the policy should also seek to preserve shrubs and hedgerows; • the need for tree lined streets to be appropriately designed to meet the needs of users; • questions seeking further clarification of the standards for measuring biomass and the circumstances under which Policy DH5 could allow development involving loss of trees. 	<p>Policy has been renamed ‘Trees and Landscaping’, to reflect that landscaping is also covered by the Policy.</p> <p>Amended the emphasis of the policy to a value-focused approach, as well as updates to note that replacement planting should be on a greater than 1:1 basis. Policy also amended to encourage additional tree planting and now clarifies that landscaping schemes should provide non-invasive native species or species attuned to climate change and should allow sufficient soil volume to enable new trees to survive into maturity.</p> <p>Supporting text has been amended to expand the benefits of trees, clarify expectations where trees are proposed to be removed, and encourage early engagement between applicants, arboriculturists and the Council.</p> <p>A number of other minor changes have been made for the purposes of clarity.</p>
Policy DH6: Shopfronts, Signage and Advertisements	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> • concerns of internally illuminated signage in the Chobham Conservation Area, 	<p>No changes.</p>

Summary of key issues raised	Changes made to the Local Plan
<ul style="list-style-type: none"> that the design of any hoardings erected on construction sites should reflect the character of the area and consideration given to landlords to maintain the attractiveness of vacant units. 	
Policy DH7: Heritage Assets	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> concerns where heritage assets may be deliberately neglected or damaged in order that their deterioration can be a factor in planning applications; minor wording changes suggested for consistency; consider an Article 4 direction is needed for Chobham Conservation Area; concerns regarding development relating to the locally listed Archaeology Centre on London Road Bagshot; concern regarding the potential for archaeological sites at Land East of Benner Lane, West End; the need to update the Local List; and the draft of the Local Plan does not place enough emphasis on the importance of Conservation Areas in their contribution the Borough as a whole and some boundaries should be reviewed. 	<p>A number of minor amendments have been made to the main Policy text to improve clarity. The most notable of these is the inclusion of a new criterion, indicating that proposals which put heritage assets to viable uses consistent with their conservation will be supported, provided that the proposals are consistent with other criterion.</p> <p>Additional supporting text has been added setting out that evidence of deliberate neglect of damage to a heritage building will not be taken in to account in decision making.</p>
DH8: Building Emission Standards	
<p>Comments of support with other matters raised including:</p> <ul style="list-style-type: none"> unclear whether net zero is a mandatory requirement from adoption of the Local Plan or will be 'stepped'. 	<p>Policy wording amended to require all major development proposals to produce a Site Waste Management Plan.</p> <p>A number of other amendments have been made to strengthen and expand the requirements of this policy and supporting text. This includes strengthened wording on construction practices relating to embodied emissions, added references to other design standards, such as PassivHaus, and updated text to reflect most up to date information on the Future Homes Standard.</p>

Summary of key issues raised	Changes made to the Local Plan
	A number of other minor changes have been made for the purposes of clarity.
Local Area Profiles	
A number of comments queried the status of the Profiles and whether they were part of Policy. Other responses made detailed comments on the Profiles seeking for example, the addition of sites, changes to map annotations and corrections to local information.	The Local Area Profiles (LAPs) set out a locally specific summary of the implications of Local Plan Policies and allocations on local areas within Surrey Heath. Having regard to the representations received which queried the purpose of the LAPs it is considered that these would be a more useful resource if they sit outside of the Local Plan process, rather than being set out in the Local Plan itself. The LAPS have therefore been removed from the Plan and will be published as separate information documents once the Local Pan is adopted.

Table 2: Draft Surrey Heath Local Plan Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople (2019 – 2038) Regulation 18 consultation August – September 2022.

Summary of key issues raised	Changes made to the Local Plan
Policy HA12/02 Swift Lane Extension	
A few concerns raised in relation to: <ul style="list-style-type: none"> • Access road not adequate • Risk of flooding • Number and size of pitches • Proximity to the recycling centre • Consideration of previous enforcement action 	Policy text has been updated to indicate that development should provide clear and defensible site boundaries sensitive to the countryside setting. Supporting text updated to reflect that opportunities to improve the access arrangements serving the recycling centre and Gypsy and Traveller site should be explored with Surrey County Council at pre-application stage.
Policy HA12/03 Land South of Broadford Lane, Chobham	
Numerous objections received relating to: <ul style="list-style-type: none"> • Access road not adequate • Conflict with existing bridleway • Existing congestion in Chobham and lack of infrastructure • In the Green Belt • Potential impact on listed building 	Following stakeholder engagement and feasibility work, it is no longer proposed to include this site as an allocation and it is not included within the Regulation 19 Local Plan.

<ul style="list-style-type: none"> • Conflict with adjacent sewage works, health and safety issues • Impact on character of the area, trees and biodiversity • Risk of flooding • Needs further evidence (ecology, noise, contamination) • Site is not sustainable • Questions support from Gypsy and Traveller community 	
<p>Policy HA12/04 Bonds Drive Extension</p>	
<p>A few objections raised in relation to:</p> <ul style="list-style-type: none"> • Risk of flooding • In the Green Belt • Site is unsuitable for any form of development • Access road not adequate • Unsustainable location and impact on infrastructure • Landowner states site is not for sale • Impact on biodiversity • Detrimental to character of the area • Presence of a burial ground • Impact on settled community 	<p>Following further feasibility work, it is no longer proposed to include this site as an allocation and it is not included within the Regulation 19 Local Plan.</p>
<p>General comments</p>	
<p>Support for allocating sites to meet identified accommodation needs. Future options for additional SANG need to be assessed. Consider using parts of strategic development sites and suggested alternative sites including MOD land. Provision could be made at Fair Oaks.</p> <p>Concerns have been raised in relation to:</p> <ul style="list-style-type: none"> • Insufficient pitches allocated • Windlesham and Chobham Parishes being disproportionately burdened with G&T sites/pitches • Weakening of the Green Belt by allocating sites within it • The methodology of the GTAA continues to be criticised • Management of the existing Kalima site • Potential use of compulsory purchase powers 	<p>In view of the challenges that the Council has faced in identifying suitable and deliverable sites to meet identified needs, a number of amendments have been made to Policies H9, H11 and GBC4.</p>

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Appendix 2

Appendix 2 – Representations to the ‘Draft Surrey Heath Local Plan: Preferred Options (2019-2038)’ Consultation in May 2022, including a Landscape and Visual Appraisal and Green Belt Review

BIRMINGHAM
BRISTOL
CAMBRIDGE
CARDIFF
EDINBURGH
GLASGOW
KINGS HILL
LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOUTHAMPTON

**BARTON
WILLMORE** now  **Stantec**

bartonwillmore.co.uk
The Blade
Abbey Square
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9th May, 2022

Dear Ms. Reeves,

DRAFT SURREY HEATH LOCAL PLAN: PREFERRED OPTIONS (2019-2038)
REPRESENTATIONS SUBMITTED ON BEHALF OF THE LONGCROSS PARTNERSHIP

We are pleased to submit the following representations on behalf of The Longcross Partnership in response to the Draft Surrey Heath Local Plan: Preferred Options (2019-2038) consultation ('the Local Plan'). These representations relate to the land which forms part of Longcross Garden Village ('the Site') which is located on the north-eastern edge of Surrey Heath Borough. The Site is identified within Policy ER2 of the Local Plan as a Strategic Employment Site.

Overview

As background, the Site (previously referred to as the Former Defence and Research Evaluation Agency (DERA) Site) was identified by the Department for Communities and Local Government (DCLG) as a 'Local Led Garden Village' in January 2017. This followed a bid submitted by Runnymede Borough Council (RBC) in 2016 which was supported by Surrey Heath Borough Council ('the Council')¹.

The majority of Longcross Garden Village is located in the adjoining administrative area of RBC. This land is identified in Policy SD1: Spatial Strategy of the adopted Runnymede 2030 Local Plan as a settlement and allocated in Policy SD9: Longcross Garden Village as a new garden village for a mixed use development comprising a minimum of 1,700 homes, supporting facilities and community infrastructure, employment, green and blue infrastructure, and a package of sustainable transport measures. This part of Longcross Garden Village, located within Runnymede Borough, is inset from the Green Belt.

¹ [Runnymede's Village Garden Bid](#)

The Site is located to the north of the M3 motorway, forming the western part of Longcross Garden Village. The Site's eastern edge is formed by the administrative boundary between Surrey Heath and Runnymede Boroughs. The western boundary is formed by Burma Road, beyond which is Chobham Common. The Waterloo to Reading railway line passes from east to west to the north of the Site. To the north of the railway line is Wentworth Golf Course and to the south of the M3 is the southern part of the Longcross Garden Village (referred to as Longcross South), the former Longcross Barracks and Chobham Common.

Summary

These representations seek the removal of the Site from the Green Belt. As explained below and as set out in the Landscape and Visual Impact Assessment and Green Belt Review report which accompanies these representations (**Appendix 1**), the Site does not satisfy the relevant criteria contained within paragraph 143 of the National Planning Policy Framework (NPPF) (July 2021). Furthermore, in accordance with paragraphs 140 and 142, exceptional circumstances can be fully evidenced and justified to release the Site from the Green Belt but has failed to be subject to any consideration in the Council's Green Belt Review (GBR) (January 2022)² for reasons which are clearly flawed.

In our view, the Site should be identified in the Key Diagram as being outside of the Green Belt. We support the principle of the Site being identified as a Strategic Employment Site and seek modifications to the policy to provide greater flexibility for a broader range of employment generating uses.

Policy SS1: Spatial Strategy and the Key Diagram

Exceptional Circumstances

The Council appears to accept that exceptional circumstances exist to review Green Belt boundaries through this local plan review, as explained in paragraphs 2.15 to 2.17 of the Local Plan. The review of Green Belt boundaries proposed in the Local Plan comprises the removal of land from the Green Belt where 1) there has been a material change in circumstances, for example, there are sites on which planning permission has been granted for built development, and 2) where village settlements currently washed over by the Green Belt are to be inset. Paragraph 2.17 states that there are no exceptional circumstances to release land from the Green Belt to meet identified housing need.

The release of the Site from the Green Belt is not proposed to help meet housing need. As explained in the LVA & GB Review accompanying these representations (**Appendix 1**), the Site does not perform a Green Belt function. This was recognised by the Inspector appointed to examine the Runnymede 2030 Local Plan who stated at paragraph 97 of her report³:

"The proposed boundaries of [Longcross Garden Village] to the north, east and south (the railway line, Kitsmead Lane, and Longcross Road (B386), respectively) are permanent, durable features that will define the limits of the village and protect the surrounding Green Belt from urban sprawl. To the west, the borough boundary bisects developed areas of the site that lie east of Burma Road and it is reasonable that this is defined as the western

² [Green Belt Review Final .pdf \(surreyheath.gov.uk\)](#)

³ [Inspector's Report on the Runnymede 2030 Local Plan](#)

boundary of the allocation in the Plan. However, there is no reason to doubt that in due course a permanent, durable western boundary along Burma Road and its continuation onto the B386 can be defined through the emerging Surrey Heath local plan, which will provide a defensible Green Belt boundary.” (our emphasis)

Furthermore, having regard to the material change in circumstances with the majority of Longcross Garden Village being removed from the Green Belt and allocated for a new settlement, it is indisputable that the Site should be assessed by the Council's in its evidence base and removed from the Green Belt through the Local Plan.

Green Belt Review (January 2022)

The Council has undertaken a GBR to support this consultation on the Local Plan. Surprisingly, it is clear that the Council has given no positive consideration to the surrounding context beyond its administrative boundary (see Figure 2 of the GBR). Consequently, it has failed to consider settlements such as Longcross Garden Village which are located on the edge of the Borough. In our view, this approach is flawed, and we request that the GBR is updated to include Longcross Garden Village as one of the settlements listed at paragraph 3.10 and Figure 2 updated to include an appropriate buffer associated with this new garden village settlement.

It is also important that the GBR acknowledges the sustainability of Longcross Garden Village, having regard to existing and proposed public transport provision, employment, and its planned scale in terms of housing development.

The Site is also previously developed land and includes existing buildings, many of which are currently leased to and used by Longcross Studios (operated by Netflix), and areas of hardstanding. A more detailed description of the existing development on the Site is provided in the LVA & GB Review submitted with these representations (enclosed).

The GBR applies constraints as part of the sieving of areas to be excluded. Whilst we acknowledge that land within 400 metres of the Thames Basin Heaths Special Protection Area (TBHSPA) is a constraint for new residential development, it is not a constraint for employment development. Taking account of the Site's designation as a Strategic Employment Site, which we support in principle, the TBHSPA is not a robust or reasonable basis for excluding the Site from the GBR.

The LVA & GB Review submitted with these representations includes an assessment of the Site against the purposes on including land within the Green Belt. In summary, it concludes that, 1) the Site makes no contribution to the purposes of land being included within the Green Belt; and 2) that redevelopment of the Site can be achieved with limited or no adverse landscape and visual impacts.

Therefore, in conclusion, to inform the preparation of the Regulation 19 Proposed Submission Local Plan, the Council should update the GBR to include an assessment of the Site. Taking account of our assessment of the Site and having regard to the Runnymede Local Plan Inspector's analysis (see above), it is clear that site-specific exceptional circumstances exist to justify the Site's removal from the Green Belt.

Employment

We note that the Council's Employment Land Review Topic Paper is dated 2019. As such, the Council's evidence base pre-dates both the Covid-19 pandemic and the decision taken to retain and expand the Film Studio use at Longcross Garden Village, and consequently, not to deliver the commercial park which was granted planning permission in 2014. In our view, the Council's evidence base should be updated to inform the Regulation 19 consultation.

Furthermore, taking account of the employment generating uses which immediately adjoin the Site to the east, we seek greater flexibility in the range of use classes which are referred to in Policy SS1 and elsewhere in the Local Plan. In our view, such an approach would be consistent with the overall objectives of the Local Plan which includes facilitating strong economic performance.

Recommended Modifications to Policy SS1 and the Key Diagram

For the reasons provided above:

- The Key Diagram should be modified to exclude the Site from the Green Belt.
- Policy SS1 and/or the supporting text should acknowledge the importance of Longcross Garden Village as a sustainable new garden village settlement including its identification as part of the Enterprise M3 Enterprise Zone, the existing and planned employment uses adjoining the Site, and Longcross train station contributing to the sustainable transport package which will serve the settlement.
- Part 3) of policy SS1 should provide for a broader range of employment generating uses. References to Employment Uses (which are not defined in the Glossary) should be expressed as comprising Use Class B2, B8 and E (g) and appropriate employment generating uses which are Sui Generis.

Policy ER2: Strategic Employment Sites

On behalf of The Longcross Partnership, we support the inclusion of the Site as one of the identified Strategic Employment Sites. In our view, the Site should be referred to as Longcross Garden Village to reflect its current and future identity.

For the reasons set out above, Policy ER2 should be amended to allow for a more flexible approach to employment generating uses within the Strategic Employment Sites. This should be reflected in the wording of Policy ER2 and the supporting text.

Taking account of our response to Policy SS1 above, paragraph 4.63 of the Local Plan should be updated if, as we say it should, the Site is removed from the Green Belt.

We trust that these representations will be of assistance to the Council in producing its Regulation 19 Proposed Submission version of the Local Plan. We support the Council in bringing forward this review and look forward to future stages of the process coming forward as quickly as possible.

Please let us know by contacting the writer on 0118 943 0000 or by emailing [REDACTED] if you require any additional information or if there are any queries regarding the points made in this submission.

Yours sincerely,



MICHAEL KNOTT
Planning Director

Encs.

cc. B. Littman - The Longcross Partnership
G. Chinniah - Surrey Heath Borough Council
G. Pacey - Runnymede Borough Council

Appendix 2

Appendix 2 – Representations to the ‘Draft Surrey Heath Local Plan: Preferred Options (2019-2038)’ Consultation in May 2022, including a Landscape and Visual Appraisal and Green Belt Review

Longcross North, Surrey Heath: Initial Landscape & Visual Appraisal & Green Belt Review

Prepared on behalf of The Longcross Partnership

May 2022

Longcross North, Surrey Heath: Initial Landscape & Visual Appraisal, Green Belt Review

Prepared on behalf of Aviva Investors

Project Ref:	32558
Status:	Draft
Issue/ Rev:	02
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Prepared by:	CM
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CONTENTS

1.0	Site Context	1
2.0	Planning Policy	2
3.0	Assessment of the Site	9
4.0	Conclusion	19

ILLUSTRATIVE MATERIAL

Figure 1: Site Context Plan

Figure 2: Topography Plan

Figure 3: Landscape Character Plan

Figure 4: Site Appraisal Plan

Figure 5: Landscape and Visual Opportunities and Constraints Plan

Site Context Photographs

Site Appraisal Photographs

1.0 SITE CONTEXT

- 1.1 The Site is a major developed site within the Green Belt located to the north of the M3 motorway, forming the western part of Longcross North, Surrey Heath. The Site's eastern edge is formed by the administrative boundary between Surrey Heath and Runnymede Boroughs. The western boundary is formed by Burma Road, beyond which is Chobham Common. The Waterloo to Reading railway line passes from east to west to the north of the Site. To the north of the railway line is Wentworth Golf Course and to the south of the M3 is the southern part of the Longcross North, Surrey Heath (referred to as Longcross South), the former Longcross Barracks and Chobham Common.
- 1.2 The majority of the Site consists of medium-scale office and commercial shed buildings, roads, carparks and hardstanding interspersed with groups of trees, adjacent to the larger Longcross Garden Village development area, which is populated with large-scale commercial shed buildings. The western and southern portion of the Site, between the main access road and the western perimeter of the Site (defined by Burma Road), is a densely planted woodland edge.
- 1.3 Chobham Common to the west and south of the Site has an attractive visual character and recreational value (open access to the moorland and a network of Public Rights of Way (PRoW) as well as wildlife designations. However, there are no views into the Site from within Chobham Common due to the height and density of the woodland on the western and southern edge of the Site.
- 1.4 The Site and land to the west of it within Surrey Heath District is located within the Metropolitan Green Belt (GB). The larger part of the Longcross Garden Village developed area to the east of the Site forms part of the Urban Area of Runnymede (Policy SD1 of Runnymede 2030 Local Plan) and Longcross Garden Village (Policy SD9).

2.0 PLANNING POLICY

Surrey Heath Borough Core Strategy & Development Management Policies, 2012ⁱ

- 2.1 Major Developed Sites within Green Belt in Surrey Heath Borough are subject to Policy CP1: Spatial Strategy, which states that:

"Within the countryside the current extent of the Green Belt (as shown on the Proposals Map) will be maintained. Any change to the boundaries of the Major Developed Sites will be considered through the site allocations DPD...."

- 2.2 Para 5.7 of the Core Strategy states:

"Major Developed Sites in the Green Belt within the Borough are: the DERA site, Chobham; Fair Oaks Airport, Chobham; and Gordons School, West End. A review of the specific policies for these sites and boundaries will be undertaken through a Site Allocations Development Plan Document. Further policies relating to the control of development in the countryside are included in the Development Management Policies."

- 2.3 CP13 Green Infrastructure states:

"In considering proposals for any new development the Borough Council will encourage schemes which contribute toward, or provide, opportunities to enhance the function of existing green infrastructure, increase provision and improve connectivity. Development which results in the loss, fragmentation or isolation of green infrastructure will be resisted."

- 2.4 CP14 Biodiversity and Nature Conservation states:

"The Borough Council will seek to conserve and enhance biodiversity within Surrey Heath. Working with partners, new opportunities for habitat creation and protection will be explored in particular on biodiversity opportunity areas. Development that results in harm to or loss of features of interest for biodiversity will not be permitted."

Surrey Heath Local Plan 2000 Saved Policiesⁱⁱ

- 2.5 RE17 Major Developed Sites in the Green Belt identified The DERA Test and Evaluation Centre, Chobham Lane, Longcross as a "Major Developed Site" to which the following criteria for redevelopment will apply:

"Redevelopment should: (d) Have no greater impact than the existing development on the openness of the Green Belt and the purposes of including the land in it, and where possible have

less; (e) Contribute to the achievement of the objectives for the use of the land in the Green Belt; (f) Not exceed the general height of the existing buildings; (g) Not occupy a larger area of the site than the existing buildings; (h) Ensure that the new buildings are located to have regard to the openness of the Green Belt, existing landscape features and the need to integrate with the surroundings; (i) Be part of a comprehensive scheme; and (j) Not give rise to off-site infrastructure problems."

Draft Local Plan 2019-2038 Reg 18 Consultation version, March 2022

2.6 Draft Policy IN5: Green Infrastructure states that:

"2) The Council will support proposals which:

a) reinforce, link, buffer and create new green infrastructure; and

b) promote, manage and enhance public enjoyment of green infrastructure.

3) Development proposals will not be permitted where they will result in the loss or fragmentation of existing green infrastructure assets/components or compromise the integrity of the green infrastructure network as set out in the Green Infrastructure Strategy, ..."

2.7 Draft Policy E1 Thames Basin Heaths Special Protection Area states:

"The Council will only permit development where it is satisfied that this will not give rise to likely significant adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (SPA)"

2.8 Draft Policy E3 Biodiversity Net Gain states:

"Development proposals will be permitted provided that they can demonstrate the provision of a minimum 20% increase in biodiversity units when set against the baseline biodiversity value and are in accordance with national guidance."

2.9 Draft Policy E7 Landscape Character states:

"2) Development proposals should demonstrate that:

a) they can integrate with, and positively contribute to the landscape character of the area;

b) they are sited and designed so as to avoid any adverse impact on key positive landscape attributes identified in relevant

Landscape Character Assessments and Landscape Sensitivity Studies;

c) they are sited and designed to minimise landscape and visual impacts, in line with the analysis, guidance and strategies provided in relevant Landscape Character Assessments and Landscape Sensitivity Studies;

d) they consider cumulative impacts with other existing and proposed development;

e) there is no adverse impact on historic landscapes and registered parks and gardens; and

f) they respect the role the landscape plays in the setting of settlements as set out in relevant landscape sensitivity or other study."

2.10 Draft Policy GBC1 Development of new buildings within the Green Belt states:

"6) In assessing proposals for the partial or complete redevelopment of previously developed land, regard will be had to:

a) the existing and proposed floor space and volume of the development;

b) the general height and storeys of existing and proposed buildings and their disposition around and within the site."

2.11 Draft Policy DH1: Design Principles

2) Development will be permitted where it is demonstrated that it:

Local character

a) respects the distinct local character of the area and responds to and reinforces locally distinct patterns of development and their rural, village or urban setting paying particular regard to height, scale, materials, massing and bulk.

b) incorporates a level of architectural detail and use of materials that responds to the distinct local character of the area.

c) protects trees and other vegetation worthy of retention and includes high quality hard and soft landscaping that respects the distinct local character.

d) would not have a detrimental impact upon heritage assets or their setting, in line with their significance.

2.12 Draft Policy DH5: Trees states:

1) Development proposals will be permitted where:

a) it can be demonstrated that trees, hedgerows and woodland of amenity or other value can be retained as an integral part of the design of development unless the requirements of 2) have been met; and

b) sufficient space is provided for trees and other vegetation to mature; and

c) provision is made for the care and protection of existing trees and hedgerows to be retained prior to, during and after the construction process, including measures for the long-term management and maintenance of existing and new trees and landscaping.

2) Development will not be permitted which involves felling, significant pruning works (either now or in the foreseeable future) and/or potential root damage to trees of amenity or other value, unless one of the following circumstances apply:

a) their long-term survival would be compromised by their age or physical condition (except in cases of ancient or veteran trees); or

b) there are exceptional and demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity and other value of the trees.

3) Where proposals would result in the loss of trees, appropriate replacement planting should be provided such that there is no net loss in the biomass equal to the original tree.

4) Landscaping is an integral element in layout design. Trees and landscaping schemes for new residential development and commercial floorspace will be expected to:

a) provide new trees appropriate to the landscape profile of the area;

b) ensure that, by nature of their location and species choice, they are designed so as to facilitate adaptation to climate change by providing shade, shelter and cooling; and,

c) provide sufficient space between development and the highway to enable new streets to be tree lined.

5) Trees and landscaping schemes, by nature of their location and species choice should ensure that they are designed so as to facilitate adaptation to climate change by providing shade, shelter and cooling.

Runnymede 2030 Local Plan, 2020ⁱⁱⁱ

2.13 The Runnymede Local Plan identifies Longcross North, Surrey Heath in Policy SD9 as land shown on Figure 2 of the Local Plan, covering the wider area of Longcross Garden Village site of which the Site forms the western edge, within Surrey Heath Borough. Paragraph 5.91 of the Local Plan notes that:

"The area of garden village within Runnymede is identified on Figure 2 on page 56 of this Local Plan and the adopted Policies Map. This is the area released from the Green Belt to form the village settlement area within the Borough of Runnymede and extends to some 137 hectares (ha). The designation and use of 12ha of the village which lies within the Borough of Surrey Heath will be a matter for the Surrey Heath Local Plan and Runnymede Borough Council will continue to work with Surrey Heath Borough Council under the Duty to Cooperate to ensure that the proposed garden village is delivered as anticipated. (Our emphasis)

Evidence Base

2.14 As part of the emerging local plan Surrey Heath Borough Council (SHBC) have carried out the following Green Belt studies:

- Green Belt and Countryside Study, 2017^{iv};
- Green Belt Sites Appraisal, 2018^v;
- Green Belt Review, 2022^{vi}; and
- Green Belt Review Sustainability Assessment, 2022^{vii}

Surrey Heath Borough Council Green Belt and Countryside Study, October 2017

2.15 The Site forms part of Initial Land Parcel G16 land at Chobham Common, a 173 hectare area of Green Belt covering the western edge of Longcross Studios (east) to Chobham Road (west), and from the Reading to Waterloo mainline (north) to the B386 (south). This is described as ***"gently undulating open heath at Chobham Common, notwithstanding a small area in the very east of the Parcel, which incorporates a small area of Longcross Studio"***.

2.16 Parcel G16 is considered not to contribute to purpose 1 as it is not adjacent to any defined large, built-up areas and to perform weakly against Purpose 2 – To prevent neighbouring towns from merging. The assessment notes that the area plays ***"a limited role in preventing the merging or erosion of the gap between settlements. The Parcel influences the***

perception of a moderate gap between Sunningdale and Trumps Green and arguably provides a good rural break between the settlements, however the Parcel's capacity to prevent the merging of the settlements is limited by virtue of its location. The Parcel also lies within a gap between Sunningdale and Windlesham, West End and Chobham. The gap between the settlements however is broad and whilst the DERA/Longcross Site does influence how the gap between the settlements is perceived to a very small degree, it is recognised that some loss of openness would not be perceived as reducing the gap between settlements."

- 2.17 Due to the "***variance in performance across the Parcel against Purpose 3***", Parcel G16 is split in two parts, Parcel G16b covering the area of the Site, and G16a the larger area of Chobham Common. The assessment notes that "***Parcel G16b exhibits some characteristics of the countryside, however the Parcel incorporates a number of modest buildings associated with the Longcross site, and the openness of the Parcel is compromised because of these. The Land Parcel is also subject to urbanising influences from neighbouring development within the Longcross site.***" The assessment concludes that G16b scores weakly against Purpose 3 – To assist in safeguarding the countryside from development.

Surrey Heath Green Belt Sites Appraisal 2018

- 2.18 The Surrey Heath Green Belt Sites Appraisal 2018 does not include an assessment of the Site.

Surrey Heath Borough Council Green Belt Review, 2022

- 2.19 The parcels considered within the Surrey Heath Green Belt Review 2022 are concentrated around Windlesham and Bagshot, with the area of Chobham Common, including the Site, covered as an area of "Absolute Constraint" and therefore not considered.

Surrey Heath Employment Land Review, 2016^{viii}

- 2.20 The SHBC Employment Land Review 2016 identifies the Site as area SH6 Former DERA Site, Longcross near Chobham. Section 3 of the review includes an assessment of the site at Page 372. This notes that the "***Site is located within the Green Belt but is previously developed and a Major Developed Site. It is possible there could be opportunity for intensification of uses through redevelopment, subject to design***" and that "***Some areas of the site remain largely wooded and undeveloped***".

Surrey Heath Employment Land Technical Paper Update 2019, September 2020^{ix}

- 2.21 The Employment Land Assessment Update identifies the Site as SH5 DERA, Longcross. The assessment of the site is set out in Appendix B: Employment Site Assessment at page 134-139 and is the same that of the 2016 assessment above in relation to developability of the site.

Summary

- 2.22 Whilst the Site is located within the Metropolitan Green Belt, it is identified as part of a “Major Developed Site in the Green Belt” which is supported for redevelopment, both in existing and emerging policy, subject to restrictions as set out in the policies, in particular the volume (height and area) of built-form. The policies are supported by the 2017 Green Belt and Countryside Study, which identifies the Site as a sub-area of the wider Green Belt parcel G16, which by its nature of being currently developed, scores weakly or not at all against the NPPF purposes of the Green Belt.
- 2.23 Under current policy for Surrey Heath development of the Site should be permitted for employment uses provided there is:
- No loss or fragmentation of the existing Green Infrastructure (GI) and that linkages, buffers and public enjoyment of GI is enhanced where possible;
 - Biodiversity is enhanced (20% Biodiversity net gain required under emerging policy);
 - No negative effect upon the Thames Basin Heath SPA designation;
 - No greater effect upon the openness of the Green Belt than exists at present;
 - Existing heights and volumes of built-form are not exceeded;
 - The proposals enhance the existing landscape character and avoid adverse effects upon characteristics identified with in published landscape character and sensitivity studies; and
 - Existing landscape features are retained trees are given additional protection under the emerging policy.
- 2.24 The Site’s location adjacent to and forming a contiguous part of the Runnymede Urban Area provides an opportunity to redefine the existing Green Belt boundary along the clearer and more defensible boundary of Burma Road on the western edge of the Site, releasing the Site from Green Belt. The principle of releasing the Site from the Green Belt is supported by Runnymede planning policy as part of the delivery of Longcross North, Surrey Heath.

3.0 ASSESSMENT OF THE SITE

3.1 This note proposes to give a high-level overview of the Site in terms of the following:

- Landscape Character and potential for impacts upon surrounding landscape character;
- Visual Amenity and role of the site in potential effects upon visual amenity; and
- Contribution to the purposes of the Green Belt.

3.2 The Landscape and Visual Appraisal has been prepared with reference to the guidelines as set out in the Guidelines for Landscape and Visual Impact Assessment^x. The aim of these guidelines is to set high standards for the scope and content of landscape and visual assessments and to establish certain principles that will help to achieve consistency, credibility and effectiveness when undertaking these types of assessment.

3.3 A desktop assessment of the area of study was undertaken, including an assessment of landscape character, landform, landscape features, policy and designations. This information was used as the initial basis against which to appraise the existing and potential future effect on openness of the wider Green Belt. A visit to the study area and surroundings was subsequently undertaken in February 2022 to verify the desk-based findings for the Site.

3.4 A description of the existing land use within and surrounding the Site is provided and includes reference to areas of settlement or development and transport routes; landform, enclosure and vegetation cover and representativeness of prevailing landscape character.

3.5 To determine the extent of visual influence, a visual appraisal was undertaken to consider the nature of existing views from publicly accessible areas including roads, Public Rights of Way (PRoW) and public open spaces.

3.6 Designations, elements of cultural and heritage value, sense of tranquillity/remoteness and scenic beauty, and contribution to the healthy functioning of the landscape are noted, and these factors combine to provide an understanding of the landscape value of the Site.

Green Belt Assessment Methodology

3.7 The Green Belt assessment considers the Site against each of the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). The five criteria considered are:

- i) To check the unrestricted sprawl of large built-up areas;
- ii) To prevent neighbouring towns from merging in to one another;
- iii) To assist in safeguarding the countryside from encroachment;

- iv) To preserve the setting and special character of historic towns; and
- v) To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

3.8 The contribution that the Site makes to the purposes of the Green Belt is determined, with reference to the criteria set out in Table 1.

Table 1: Purposes of the Green Belt – Assessment Criteria.

Purpose	Criteria
Check the unrestricted sprawl of large built-up areas.	<p>Considerable - Development of the land would be strongly perceived as sprawl, as it is not contained by robust physical features and/or would extend the settlement pattern in an incoherent manner.</p> <p>Some - Development of the land would be perceived as sprawl, as it is partially contained by robust physical features and/or would extend the settlement pattern in a moderately incoherent manner.</p> <p>Limited - Development of the land would be perceived as sprawl to a limited degree, as it is largely contained by robust physical features and/or would extend the settlement pattern in a broadly coherent manner.</p> <p>None - Development of the land would not be perceived as sprawl as it is well contained by robust physical features and/or is entirely set within the existing coherent settlement pattern.</p>
Prevent neighbouring towns from merging	<p>Considerable - Development would result in the physical unification of two (or more) towns</p> <p>Some - Development would substantially reduce the physical or perceived separation between towns</p> <p>Limited - Development would result in a limited reduction in the physical or perceived separation between towns</p> <p>None - Development would not physically or perceptually reduce the separation between towns</p>
Assist in safeguarding the countryside from encroachment.	<p>Considerable: No built or engineered forms present and perceived as inherently undeveloped and/or rural in character. Development would potentially result in a strong urbanising influence over the wider landscape.</p> <p>Some: Built or engineered forms present but retaining a perception of being predominantly undeveloped and/or rural in character. Development would potentially result in a moderate urbanising influence over the wider landscape.</p> <p>Limited: Built or engineered forms present and a minimal perception of being undeveloped and or rural in character. Development would potentially result in a limited urbanising influence over the wider landscape.</p> <p>None: Built or engineered forms present and perceived as inherently developed and/or urban in character. Development would not result in urbanising influence over the wider landscape.</p>

- 3.9 The characteristics of the Green Belt are also considered as part of the Green Belt Assessment. The relationship of the Site to existing elements of the landscape, such as development, roads, railways and rivers, as well as visual barriers such as areas of notable vegetation or built forms is determined as part of the landscape and visual appraisal process. This assists in the identification of Green Belt boundaries that may be considered to be 'permanent', and also allows for an assessment of contribution to the openness of the Green Belt, as in being free from development, that the Site makes, and to what extent the redevelopment of the Site could have on the perception of openness and function of the wider Green Belt.

Landscape Character Assessment

- 3.10 Landscape character is the combination of physical, perceptual, cultural and historic features of a particular area which together create the unique and distinctive experiential qualities of a given landscape.
- 3.11 Landscape Character Assessment is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country. This approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles.
- 3.12 The description and key characteristics of each LCA are used as a basis for evaluation in order to inform the Strategic Green Belt Review. The extent of published LCAs in the vicinity of the Site are illustrated on **Figure 2: Landscape Character Plan**, with relevant information summarised below.

Published Assessment

Surrey Landscape Character Assessment (2015) Runnymede Borough^{xi}

- 3.13 Whilst the Site is within Surrey Heath Borough, the wider character area to which it belongs is covered in the Runnymede Borough LCA. The Site forms part of the "Settled and Wooded Sandy Farmland" Landscape Character Type, key characteristics of which include the following:

"Rolling landscape...Predominately farmland, with varying degrees of settlement and woodland, with the amount of these elements, along with varying field sizes, openness and the degree of other human influences including golf courses, horse paddocks, and nurseries, broadly defining the extent of each individual character area. Urban influence and activity from settlement and transport, increases to the north. Heavily wooded in places, with ...military associations."

3.14 The Landscape Character Area within which the site is located is SS4 "Wentworth to Sheerwater Settled and Wooded Sandy Farmland" which is ***"defined by the extent of a relatively enclosed mosaic of farmland, woodland and settlement, in contrast to the more open farmland character area to the north-east"***.

3.15 Key Characteristics of SS4: Wentworth to Sheerwater Settled and Wooded Sandy Farmland include:

- ***"An undulating landscape,"***
- ***consists of considerable areas of woodland, including some areas of ancient woodland. To the north of the character area is Wentworth golf course set in clearing in the woodland, and the former Ministry of Defence site at Longcross, now used for various commercial purposes, including film studios and a test track facility. ... Elsewhere, ... the character area is more rural, with wooded interspersed with arable and pastoral fields"***

Surrey Landscape Character Assessment (2015) Surrey Heath Borough^{xii}

3.16 The Site lies adjacent to the eastern edge of the "Sandy Heath and Common" Landscape Character Type, key characteristics of which include the following:

- ***"A generally level landscape"***
- ***Well vegetated landscape with mixed woodland blocks and belts, scrub, and heathland vegetation of high ecological interest.***
- ***Includes large areas dominated by military land use with limited, managed or no public access. Settlement is largely absent apart from areas of densely concentrated army barracks and camps. This is generally a secret and remote landscape largely hidden from view apart from occasional glimpses through woodland into a more open interior.***
- ***Large areas of heath with poor sandy acidic soils with lack of intensive farming and low density of early human occupation."***

3.17 The Landscape Character Area adjacent to the Site is SH2 "Chobham Sandy Heath and Common" which is described as an ***"extent of relatively intact heath and common"***.

3.18 Key Characteristics of SH2 "Chobham Sandy Heath and Common" include:

- ***"A gently undulating landscape..."***
- ***The character area is formed from large extensive tracts of open heath, with scrub and varying sized tree groups.***
- ***Larger blocks of woodland tend to be located at the perimeter of the common, and often include Birch and Pine with Holly edges. ...***
- ***There are long open expansive views across the heath, particularly from high points, looking over scrub to woodland in the distance, such as from Staple Hill and***

Memorial Cross. Treed areas enclose or frame views in some places.

- *Cobham Common is a well-used recreational resource for walkers and cyclists. The vast majority of the character area is Open Access Land. ...*
- *The Waterloo to Reading railway line runs along the northern boundary of the character area, with Longcross railway station in close proximity. However, there is no direct public access from the station to Chobham Common, and despite frequent passing services, few trains currently stop at Longcross during the week and none at the weekend.*
- *The majority of the 'B' roads which cross the character area are screened by roadside vegetation. However, the M3 motorway crosses broadly east-west across the middle of Chobham Common, with most of the motorway at grade or elevated, and without roadside planting. It is therefore open to the surrounding landscape, and visible from public rights of way within the vicinity.*
- *The vast majority of the character area is unsettled... ..*
- *The vast majority of the character area is ... covered by various ecological designations, including the Thames Basins Heath Special Protection Area, ...*
- *This an expansive landscape of high ecological value heathland. Human influence, from roads and the M3, and recreational activity does have an effect on the character area in places, but large relatively unspoilt areas with a feeling of tranquillity and remoteness remain.*

Surrey Heath Landscape Sensitivity Assessment, 2021^{xiii}

- 3.19 The sensitivity of different landscapes within Surrey Heath Borough to residential development is considered within a Landscape Sensitivity Assessment published in 2021.
- 3.20 The Landscape Character Areas defined within the 2015 Landscape Character Assessment, discussed above, provide the spatial framework for the sensitivity assessment. Whilst this study looks at the sensitivity of the landscape in relation to residential development, it contains some useful analysis which is relevant to this landscape and visual appraisal. The proximity of the Site to SH2 "Chobham Sandy Heath and Common" LCA, gives rise to the potential for indirect effects from development upon its character.
- 3.21 The Sensitivity Evaluation of SH2 "Chobham Sandy Heath and Common" notes that its gently undulating "landform", rising to locally distinct higher ground, leads to moderate sensitivity. The former heathland and woodland pattern within the LCA give its "landscape pattern and time depth" a moderate sensitivity. The presence of semi-natural habitats with valued natural features gives the LCA's "natural character" a higher sensitivity. The presence of some historic assets gives the LCA's "built character" moderate sensitivity. As Open Access Land with a network of PROWs, the "recreational value" of the LCA has a higher sensitivity. The woodland

and pockets of heathland result in a sense of seclusion away from settlement, with the exception of roads such as the M3 motorway which *"exert some influence on immediate surrounding areas which slightly diminishes the sense of tranquillity"*. The assessment therefore concludes that the LCA's "perceptual aspects" have a moderate sensitivity. "Settlement Setting" is considered to have a moderate sensitivity due to topography and woodland providing the setting to a number of existing settlements. The "visual prominence" of the area due to woodland cover results in a lower sensitivity.

- 3.22 Overall the sensitivity of SH2 "Chobham Sandy Heath and Common" LCA is considered to be "moderate" with aspects of its natural features and recreational value being of "higher sensitivity", and its visual prominence of "lower sensitivity" ie it is a *"Visually enclosed landscape screened by landform or land cover. Does not form a visually distinctive or prominent skyline" Pg 20*).
- 3.23 Any redevelopment of the Site would not affect the "natural features" nor the "recreational value" of the neighbouring "Chobham Sandy Heath and Common", which are aspects considered to be of "higher" sensitivity. The greatest potential for indirect effects would result from visual effects, however as noted in the assessment, "visual prominence" is of lower sensitivity due to the visual enclosure by woodland.

Landscape Character of the Site

- 3.24 The Site is largely developed, as identified in the published landscape character assessments and Green Belt Study (2017), with a previous military association and in current use as film studios. It is surrounded, particularly to the west, by a mixed woodland, predominantly of pine and birch (*Pinus* and *Betulus* spp). The eastern boundary of the site, which forms part of the district boundary between Runnymede and Surrey Heath, also includes a broken plantation of woodland separating the Site from the wider Longcross Garden Village area within Runnymede District. The Site therefore is represented within the landscape character descriptions identified above. In particular, the site includes:
- a number of industrial buildings, associated roads, security fencing, hard standing, lighting and signage, which compromise the openness of the Site;
 - some characteristics of the countryside, ie pine/birch woodland on the Site perimeter; and
 - urbanising influences from neighbouring development within the Longcross site and M3 motorway.

- 3.25 These features can be seen on **Figure 4: Site Appraisal Plan**, which indicates the location of 5 Site Appraisal Photographs. **Site Appraisal Photograph A** illustrates the view from the immediate north of the Site looking south along the main access road leading south (on the

right-hand side) and west into the larger Longcross Studio Site (left). The photograph shows the nature of the industrial shed buildings and associated infrastructure within a setting that includes a mixture of evergreen and deciduous woodland. The trees in the centre of the view are located to the east of the Site boundary.

- 3.26 **Site Appraisal Photographs B-E** illustrate further the urban characteristics of the Site's internal areas. The medium-scale industrial buildings are in proportion to the height of the existing woodland edge which contains a high proportion of evergreen species and restricts outwards views even in wintertime.
- 3.27 Whilst the Site is designated as part of the Countryside Rights of Way Access Area that covers Chobham Common to the west, it is entirely private and has no recreational value. Its sense of tranquillity is very limited due to intrusion from the wider Longcross Garden Village site and noise from the nearby M3 motorway. The woodland on the western and southern parts of the Site form part of a wider block of woodland on the eastern edge of Chobham Common have an aesthetic and biodiversity value, although they are not considered to be rare. The landscape value of the Site overall considered to be low.
- 3.28 Providing that the existing woodland is retained and enhanced, the Site has capacity for re-development which could result in the improvement of its landscape condition and biodiversity and without detrimental effect upon the adjacent and more sensitive/highly valued landscape character area of Chobham Sandy Heath and Common.

Visual Amenity

- 3.29 As can be seen on **Figure 2: Topography Plan**, the Site is located on the eastern facing side of a low ridgeline that extends from a low point at Wentworth in the north to a highpoint within to Chobham Common to the south-west. As described above, the woodland on the western edge of the Site and on the eastern edge of the Common occupies the top and western side of the low ridgeline, creating a wooded edge to the open common landscape.
- 3.30 The wooded surroundings to the Site result in a very limited visual envelope as indicated on **Figure 6: Visual Appraisal Plan**. This shows the location of the selected representative viewpoints toward the site from publicly accessible locations.
- 3.31 **Site Context Photographs 1, 2, 4 and 6** illustrate views from Burma Road to the immediate west and south of the Site. The fencing and woodland on the Site perimeter are the main features of these views winter-time views, through which built form can be glimpsed within the Site. In the summer, when deciduous shrubs and trees are in leaf, it is unlikely that the buildings will be visible from Burma Road, although fencing on the Site perimeter indicates its private and inaccessible land use.

- 3.32 From within Chobham Common to the west of the Site, **Site Context Photographs 3 and 5** illustrate that the woodland on the edge of the common, together with that within the Site, completely screen views of existing built form, even at close range and in wintertime. Further to the south-west at an elevated location of Staple Hill car park within Chobham Common, **Site Context Photograph 10** illustrates a wider view across the northern part of the common with the M3 motorway in the foreground. The woodland to the west of the Site is visible beyond the woodland to the north of the motorway, however no part of Longcross Studios or Garden Village is visible amongst the trees.
- 3.33 On the approach to the Site from the bridge over the motorway, as represented by **Site Context Photograph 7**, the Site is screened from view by the surrounding woodland. From Chobham Lane to the south of the Site, as seen in **Site Context Photograph 8**, only glimpsed views are available of existing buildings through the trees. Parts of the Longcross North, Surrey Heath are under construction to the east of the Site as can be seen in **Site Context Photograph 9**. Existing built form and construction activities are a dominant feature of the view on Chobham Lane eastwards from the Site. The Site itself is not visible in these views.
- 3.34 There will be no effect upon effects upon visual amenity in external views resulting from development on the Site because of the containment provided by the topography and woodland which surround the Site, provided building heights do not exceed the height of the existing trees.

Preliminary Green Belt Assessment

- 3.35 As a major developed site in the Green Belt, the Site essentially performs weakly against the purposes of the Green Belt as identified in the Surrey Heath Green Belt and Countryside Study (2017). The assessment below is made on the assumption that the Green Belt boundary is re-aligned along Burma Road and that the Site is developed in accordance with the principles illustrated on **Figure 5: Landscape and Visual Opportunities and Constraints Plan**.
- 3.36 The principal development area encompasses previously developed parts of the Site. The woodland areas to the west and south should be maintained as woodland and managed for longevity and biodiversity.

Table 2: Assessment against the purposes on the Green Belt

Purpose		Notes	Contribution
1	To check the unrestricted sprawl of large built-up areas	The parcel is not adjacent to a large built-up area and does not contribute to this purpose	None
2	Prevent neighbouring towns from merging into one another	The Green Belt Study (2017) notes that the DERA/ Longcross site influences how the gap between the settlements of Sunningdale and Trumps Green is perceived <i>"to a</i>	None

		<i>very small degree</i> ". Even this overstates the case as the visual assessment shows that there is no perception of the site in external views on the ground. The Site is previously developed including a series of former MOD buildings, contained by Burma Road and woodland to the western boundary of the Site. Proposed development within the Site would be contained entirely or to a significant degree by the existing woodland which should be maintained.	
3	To assist in safeguarding the countryside from encroachment	The Site has a developed urban character as a result of the presence of buildings across the Site and significant areas of hardstanding. The Site is not countryside. Visual links to the wider countryside are curtailed by the strong existing woodland structure on the western edge of the Site and beyond the Site on Chobham Common. Burma Road and the woodland to the west of the road together form a strong robust edge suitable for a re-aligned Green Belt boundary. Release of the Site from Green Belt will not lead to the perception of increased development within the wider countryside.	None
4	To preserve the setting and special character of historic towns	There are no historic towns within the vicinity of this parcel of land.	None

3.37 The Green Belt assessment demonstrates that the Site does not form a functional part of the Green Belt. The Site is visually and physically connected to the rest of Longcross Garden Village to the east (which is located within Runnymede Borough and inset from the Green Belt). The Site is contained within a permanent and defensible boundary formed by Burma Road. This boundary is markedly stronger and more defensible than the current Green Belt boundary formed by a broken line of trees and which, in part, extends through existing buildings. Removal of the Site from the Green Belt, and redrawing of the Green Belt boundary along Burma Road will not affect the openness of the wider Green Belt, nor have a detrimental effect upon its performance against the Green Belt purposes.

3.38 This was recognised by the Inspector appointed to examine the Runnymede 2030 Local Plan who stated at paragraph 97 of her report^{xiv}:

"The proposed boundaries of [Longcross North, Surrey Heath] to the north, east and south (the railway line, Kitsmead Lane, and Longcross Road (B386), respectively) are permanent, durable features that will define the limits of the village and protect the surrounding Green Belt from urban sprawl. To the west, the

borough boundary bisects developed areas of the site that lie east of Burma Road and it is reasonable that this is defined as the western boundary of the allocation in the Plan. However, there is no reason to doubt that in due course a permanent, durable western boundary along Burma Road and its continuation onto the B386 can be defined through the emerging Surrey Heath local plan, which will provide a defensible Green Belt boundary. (our emphasis)

4.0 CONCLUSION

- 4.1 **Figure 5: Landscape and Visual Opportunities and Constraints Plan** shows no loss or fragmentation of the existing Green Infrastructure (GI) in the Site and its surrounding area. There is potential for is enhancement of linkages and public enjoyment of GI though opening of some woodland areas to public access, subject to security requirements.
- 4.2 Through enhanced management of the existing woodland, incorporation of new planting through the Site and a site-wide landscape and biodiversity management plan there is potential to enhance biodiversity within the Site and to ensure no negative effect upon the Thames Basin Heath SPA designation. These proposals will contribute towards enhancing the existing landscape character and avoid adverse effects upon characteristics identified with in published landscape character and sensitivity studies.
- 4.3 Removal of the Site from the Green Belt, and redrawing of the Green Belt boundary along Burma Road will not affect the openness of the wider Green Belt, nor have a detrimental effect upon its performance against the Green Belt purposes. Furthermore, the release of the Site from the Green Belt will enable the delivery of new employment development (supported by other policies in SHBC's emerging local plan) with minimal or no landscape effects or visual harm to the surrounding landscape.

ⁱ Surrey Heath Borough Council, February 2012. Core Strategy & Development Management Policies 2011- 2028

ⁱⁱ Surrey Heath Borough Council, 2000. Surrey Heath Local Plan 2000 - Saved Policies.

ⁱⁱⁱ Runnymede Borough Council, 16 July 2020. Runnymede 2030 Local Plan.

^{iv} Surrey Heath Borough Council, October 2017. Green Belt and Countryside Study.

^v Surrey Heath Borough Council, 2018. Green Belt Sites Appraisal.

^{vi} Surrey Heath Borough Council, January 2022. Green Belt Review.

^{vii} Surrey Heath Borough Council, January 2022. Green Belt Review - Sustainability Assessment.

^{viii} Surrey Heath Borough Council, 2016. Employment Land Review.

^{ix} Surrey Heath Borough Council, September 2020. Employment Land Technical Paper Update 2019.

Appendix B: Employment Site Assessments

^x IEMA/LI, 2013. Guidelines for Landscape and Visual Impact Assessment, 3rd edition.

^{xi} Hankinson Duckett, April 2015. Surrey Landscape Character Assessment: Runnymede Borough

^{xii} Hankinson Duckett, April 2015. Surrey Landscape Character Assessment: Surrey Heath Borough.

^{xiii} LUC, July 2021. Surrey Heath Landscape Sensitivity Assessment.







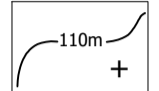






^{xiv} Inspector's Report on the Runnymede 2030 Local Plan

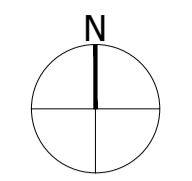
Appendix 2

Appendix 2 – Representations to the ‘Draft Surrey Heath Local Plan: Preferred Options (2019-2038)’ Consultation in May 2022, including a Landscape and Visual Appraisal and Green Belt Review



LEGEND

-  Site Boundary
-  Ancient Woodland #
-  Existing Woodlands, Copses and Tree Belts ^
-  Existing Scrub ^
-  Existing Heathland ^
-  Existing Water Courses and Features ^
-  Contours/Spot Heights (Metres AOD) ^
-  Public Rights of Way *
-  Countryside Rights of Way Access Areas #
-  Cycle Route ++
-  Listed Buildings ~
-  Registered Parks and Gardens ~
-  Scheduled Monument ~
-  Green Belt ^^
-  Allocation Site ^^
Longcross Garden Village



- Sources:
- ^ OS Mapping
 - # Natural England GIS Data Set
 - ~ Historic England National Monument Record GIS Data Set
 - ~ Runnymede and Surrey Heath Councils GIS data
 - ++ Department of Transport Cycle Network Model
 - ^^ Runnymede Local Plan 2030 Policies Map

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

FIGURE 1
 Project
 Longcross North Due Diligence

Drawing Title
 Site Context Plan



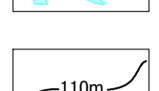

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LEGEND

-  Site Boundary
-  Existing Water Courses and Features ^
-  Contours/Spot Heights (Metres AOD) ^
-  Ridgelines

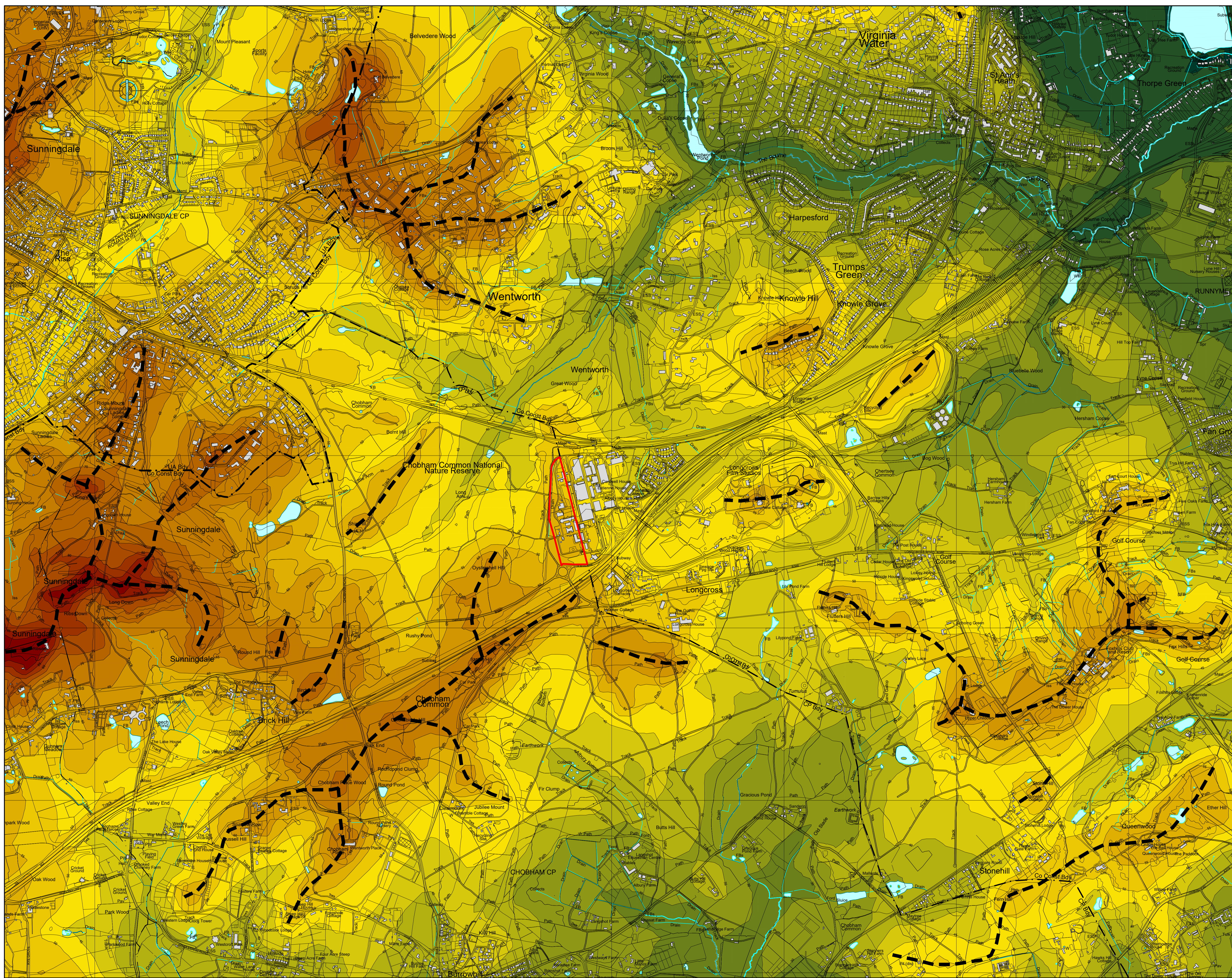
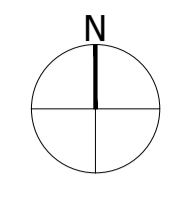
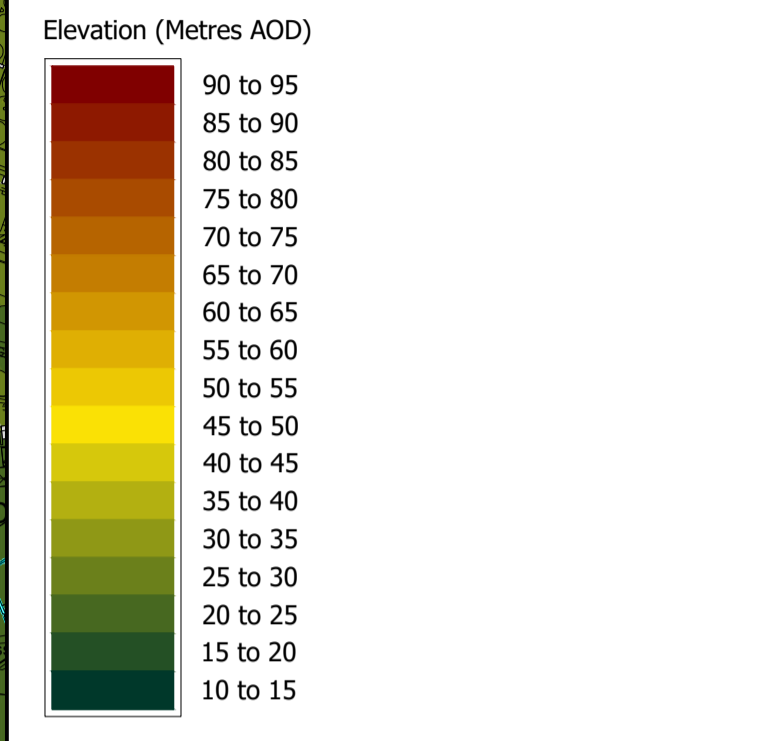


FIGURE 2
 Project: Longcross North Due Diligence

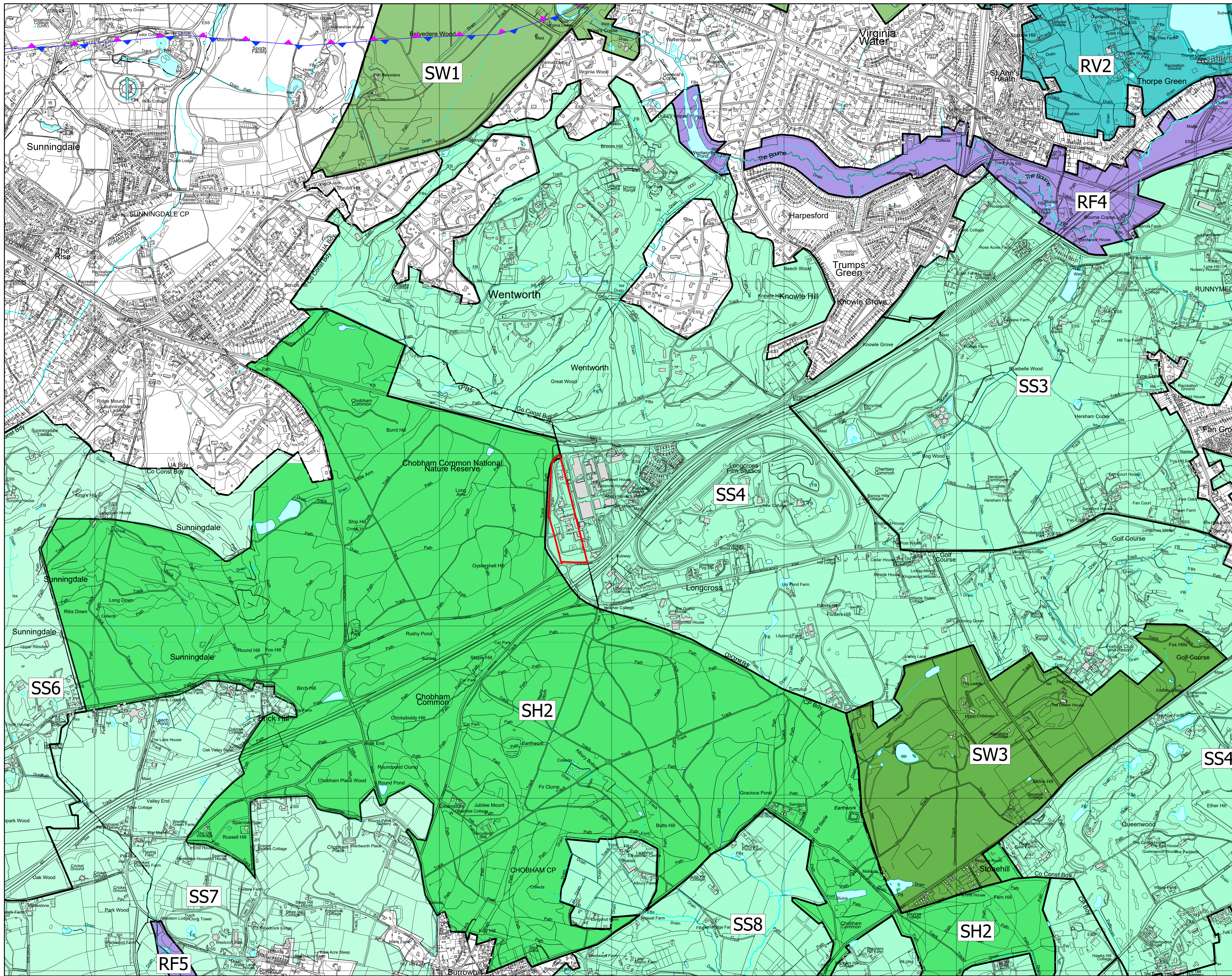
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LEGEND

- Site Boundary
- Existing Water Courses and Features ^
- National Character Area (NCA) Profiles #**
- NCA 115 - Thames Valley
- NCA 129 - Thames Basin Heaths
- Surrey Landscape Character Types (LCT) Profiles ~~~**
- RF - River Floodplain
RF4 - Northern Bourne River Floodplain
RF5 - Windbrook and Southern Bourne River Floodplain
- RV - River Valley Floor
RV2 - Thames River Valley Floor
- SS - Settled and Wooded Sandy Farmland
SS3 - Trumps Green to New Haw Settled and Wooded Sandy Farmland
SS4 - Wentworth to Sheerwater Settled and Wooded Sandy Farmland
SS6 - Windlesham Settled and Wooded Sandy Farmland
SS7 - Windlesham to Knaphill Settled and Wooded Sandy Farmland
SS8 - Chobham East Settled and Wooded Sandy Farmland
- SH - Sandy Heath and Common
SH2 - Chobham Sandy Heath and Common
- SW - Sandy Woodland
SW1 - Virginia Water Sandy Woodland
SW3 - Foxhill Sandy Woodland

Sources:
 * OS Mapping
 # Natural England GIS Data Set
 ~~~ Surrey County Council Landscape Character Assessment 2015: Runnymede Borough

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation. Inset maps using the British National Grid and may be off by a few metres. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

**FIGURE 3**  
 Project  
 Longcross North Due Diligence

Drawing Title  
 Landscape Character Plan

|            |                              |          |          |
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