



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: Corporate
Please ask for: Rachel Whillis
Direct Tel: 01276 707319
E-Mail: democratic.services@surreyheath.gov.uk

Monday, 12 October 2020

To: The Members of the **EXECUTIVE**
(Councillors: Alan McClafferty (Chairman), Colin Dougan, Josephine Hawkins,
Rebecca Jennings-Evans, David Lewis, David Mansfield and Adrian Page)

Dear Councillor,

A meeting of the **EXECUTIVE** will be held on Tuesday, 20 October 2020 at 6.00 pm. The agenda will be set out as below.

Please note that this meeting will be recorded.

Yours sincerely

Tim Pashen

(Acting) Chief Executive

AGENDA		Pages
Part 1 (Public)		
1. Apologies for Absence		-
2. Minutes		3 - 8
To confirm and sign the minutes of the meeting held on 15 September 2020 (copy attached).		
3. 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.		
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.	Review the suspension of parking charges in Rural Car Parks	9 - 16
6.	Night Stop Rough Sleeper Initiative	17 - 22
7.	Poverty in Surrey Heath	23 - 60
8.	Community Fund Grants	61 - 68
9.	Community Infrastructure Levy - Revised Approach Bidding for and Distribution of Funding Including Updating of the Regulation 123 List	69 - 80
10.	Surrey Heath Statement of Community Involvement	81 - 144
11.	Planning for the Future White Paper	145 - 170
12.	Use of CIL to fund the provision of ducting for future CCTV and Internet upgrades in Camberley Town Centre	171 - 172
13.	Kevin Cantlon Fund Repurposing - Economic Recovery	173 - 194
14.	Annual Report on the Treasury Management Service and Actual Prudential Indicators for 2019/20	195 - 210
15.	Procurement of Cleaning Contract	-
	Report to follow	
16.	Exclusion of Press and Public	211 - 212

**Part 2
(Exempt)**

17.	Community Services Partnership	213 - 276
18.	Repurposing of Supplementary Estimate	277 - 280
19.	Review of Exempt Items	

To review those items or parts thereof which can be released as information available to the public.

**Minutes of a Meeting of the Executive
held on 15 September 2020**

+ Cllr Alan McClafferty (Chairman)

- | | |
|-------------------------------|------------------------|
| + Cllr Colin Dougan | + Cllr David Lewis |
| + Cllr Josephine Hawkins | + Cllr David Mansfield |
| + Cllr Rebecca Jennings-Evans | + Cllr Adrian Page |

+ Present

In Attendance: Cllr Graham Alleway, Cllr Peter Barnett, Cllr Rodney Bates, Cllr Cliff Betton, Cllr Tim FitzGerald, Cllr Sharon Galliford, Cllr Edward Hawkins, Cllr Emma-Jane McGrath, Cllr Charlotte Morley, Cllr Sashi Mylvaganam, Cllr Robin Perry, Cllr Morgan Rise, Cllr Graham Tapper, Cllr Pat Tedder, Cllr Victoria Wheeler, Cllr Helen Whitcroft and Cllr Valerie White

34/E Minutes

The minutes of the meeting held on 11 August 2020 were confirmed and signed by the Chairman.

35/E Questions by Members

The Leader responded to a question from Councillor Morgan Rise, advising that the item on a revised scheme for the allocation of Community Infrastructure Levy funds would be brought to the next meeting. The Leader also undertook to send Councillor Victoria Wheeler a copy of the letter that it had been agreed he would send to the Fire Service at the previous meeting.

In response to a question from Councillor Helen Whitcroft, Councillor Rebecca Jennings-Evans advised that the item on Loman Road Playground later that meeting would include discussions on a proposal for a wheelchair swing in the borough.

A question from Councillor Graham Alleway on the pre-application process for Planning Applications was referred to the Executive Head of Regulatory, as this matter was a non-executive function and it did not therefore fall within the Executive's remit.

36/E Public Space Protection Orders

The Executive considered a report seeking approval for the extension of 3 year extension to the Surrey Heath Public Spaces Protection Orders (PSPOs) introduced in 2017.

Details of the review consultation undertaken in July and August 2020 were noted. A total of 41 responses had been received, all but one of which had supported the proposed 3 year extension.

Although during the past 3 years no formal prosecutions had been made, key partners, including Surrey Police, had advised that the orders enabled continuous prevention through engagement. Furthermore, the physical presence of the signage across Surrey Heath was a clear indicator of the enforcement for those who behaved irresponsibly or caused anti-social behaviour.

RESOLVED that

- (i) the Public Space Protection Order be extended for a further 3 year period; and**
- (ii) the Executive Head of Transformation be authorised to introduce operational amendments from the recommendations outlined within Annex B to this report, in consultation with the Support and Safeguarding Portfolio Holder and Surrey Heath Police Commander.**

37/E New permanent site for Gypsy and Traveller pitches

The Executive was informed that a Gypsy and Traveller Accommodation Assessment undertaken in 2019 had identified a need for 35 new Gypsy and Traveller pitches and 12 new Travelling Showpeople plots in the borough over the next 18 years. Work on the Local Plan had identified sites that could meet this need. The land at Watchmoor Nature Reserve had been identified as a possible site and it was thought it might be able to accommodate 15 pitches and 8 plots; it was therefore proposed to undertake a feasibility study to assess the potential of the land for this use.

Members discussed this proposal and a number of concerns were raised about the location of the proposed site, including air quality issues, noise pollution, flooding, and its situation between a busy road and railway track. Furthermore, there was concern about the removal of this green space and its consequent impact on the Climate Strategy. The value of the amenity of Watchmoor Nature Reserve was also noted. Notwithstanding these concerns, the limited options available to the Council to address Gypsy and Traveller provision within the borough were also recognised.

The Executive reviewed the issues that would be addressed in the feasibility study, as identified in the agenda report, and agreed to add the following additional items to the study:

- Opportunities to buy alternative land, in place of using Watchmoor Nature Reserve
- The value of the amenity of the Nature Reserve
- Any issues of flooding on the site

It was also agreed to conduct a public consultation, to include Gypsy & Traveller groups and the Police, in parallel with the feasibility study.

RESOLVED that

- (i) the Executive Head of Regulatory be authorised to undertake an initial feasibility study for provision of a new Traveller site on land at Watchmoor Reserve; and**
- (ii) a public consultation be conducted in parallel.**

Note: It was noted for the record that a number of councillors declared they had received correspondence from residents and the campaign group. It was also noted that several councillors were acquainted with the petition organiser and some councillors had met campaigners at the affected site.

38/E Loman Road Playground

The Executive considered a proposal to draw down £20,000 from the Mytchett & Deepcut Community Infrastructure Levy (CIL) funds to add to the £35,000 play improvement scheme it had agreed in March 2017. Due to the size of the facility, the play providers had advised that £35,000 would only provide a limited scheme in the well-used and popular local area of play.

It was reported that there was currently £20,000 available in the ward CIL funds and the ward councillors supported this draw down of additional funds so a new playground could be developed for the local community.

Members were advised that consideration had been given to including a wheelchair swing at Loman Road playground, but Frimley Lodge Park was now considered to be a more suitable site for this facility. It was hoped this could be included in the next tranche of playground refurbishments.

RESOLVED that

- (i) £20,000 be made available to draw down from the Mytchett and Deepcut CIL funds to help refurbish Loman Road play area; and**
- (ii) the implementation of the works be delegated to the Executive Head of Business in consultation with the Portfolio Holder for Places and Strategy**

RECOMMENDED to Full Council that the Capital Programme be increased by £20,000 to fund the works at Loman Road playground.

39/E Changes to the Current Planning System

The Executive considered a draft response to the Government's consultation on short-term changes to current planning policy and regulations. It was advised that a response to the proposed fundamental reform to the planning system, as published in a White Paper, Planning for the Future, would be the subject of a future report.

Members discussed the response to small sites thresholds and it was suggested that an alternative response should be included proposing tax breaks for small and medium sized builders delivering 10-40 units. It was agreed that the wording of this response would be further discussed and delegated to the Executive Head of Regulatory for final decision.

RESOLVED that

- (i) the publication of the Government's Changes to the current planning system consultation be noted;**
- (ii) the detailed response to the consultation questions, as set out at Annex 1 to the agenda report, be agreed; and**
- (iii) the finalisation of the wording be delegated to the Executive Head of Regulatory in consultation with the Leader and Planning & People Portfolio Holder.**

40/E Funds received from the DEFRA Hardship Fund

The Executive was informed that the Council had received a grant of £40,922 from Government's DEFRA Hardship fund of a Local Authority Emergency Assistance Grant for Food. The grant could not be used fund services internally, nor for any food provisions funded during lockdown.

Members were reminded that the Council had fully supported Surrey Heath Prepared and its foodbank service this year. It was forecast that the demand for food parcels would increase over the next year from either a second Coronavirus wave, or through the downturn in the economy and increase in unemployment from the fallout from the Pandemic. It was proposed to award the full funding received, to be split between the Camberley Besom and the Woking Foodbank, which incorporated provision for the whole of Surrey Heath.

RESOLVED that

- (i) £29,000 be awarded to Camberley Besom; and**
- (ii) £11,922 be awarded to the Woking Foodbank**

from the DEFRA Hardship funding received by the Council.

Note: It was noted for the record that Councillor Rodney Bates declared that both he and another member of his family were involved in Camberley Besom and he indicated that he would not participate in the discussions on this item.

41/E Zero Based Budgeting

The Executive was informed that, at its meeting on 9 September 2020, the Performance and Finance Scrutiny Committee had considered a report on proposals for Zero Based Budgeting (ZBB) for the 2021/22 financial year. This report had been produced in response to the Council's request at its meeting on

26 February 2020 that proposals for ZBB be prepared and carried out in time for the setting of the 2021/22 budget.

The Committee had recommended that a three year rolling ZBB programme be implemented; a ZBB process would be undertaken during the first year for services that were particularly reliant on income from fees and charges, with incremental budgeting process retained for all other services. This three year rolling programme would enable the methodology to be thoroughly tested, provide an analysis of the cost drivers in those services which needed to attract customers and provide support to those services most at risk from the current Covid-19 pandemic and the associated economic downturn.

RECOMMENDED to Full Council that a Zero Based Budget be commenced this autumn for services that are particularly reliant on income from fees and charges, with incremental budgeting process retained for all other services.

42/E Response to the Monitoring Officer's report on the decision to release local land charge over Field 81

The Leader, on behalf of the Executive, presented its response to the Monitoring Officer's report on the decision to release a local land charge over Field 81, Pennypot Lane, Chobham.

43/E Write Off of Irrecoverable Bad Debts

The Executive considered a report seeking authority to write-off irrecoverable revenues bad debts over £1,500. It was advised that all of the debts had been subject to the relevant recovery action and tracing enquiries had been undertaken.

RESOLVED that bad debts totalling £98,916.38 in respect of Council Tax and £41,569.98 in respect of Non-Domestic Rates be approved for write off.

44/E Review of Exempt Items

The Executive reviewed the reports which had been considered at the meeting following the exclusion of members of the press and public, as it involved the likely disclosure of exempt information.

RESOLVED that the annex to the agenda report associated with minute 43/E remain exempt.

Chairman

This page is intentionally left blank

Review the suspension of parking charges in Pay and Display Car Parks

Summary

To review the re-introduction of parking charges in the Pay and Display car parks.

On 23 June 2020 the Executive resolved that parking charges in the Pay and Display car parks would be reviewed in October 2020.

To allow Parking Subsidy Season Tickets to be sold, as approved by the Executive Committee in June 2020, should parking charges be re-introduced.

Portfolio: Business & Transformation

Date Portfolio Holder consulted: 1 October 2020

Wards Affected: All

Recommendation

The Executive is advised to RESOLVE that

- (i) the temporary suspension of parking charges in the Pay and Display car parks be lifted on 16 November 2020;
- (ii) the 'Parking Subsidy' Season Ticket is sold at £10 per month for all Pay and Display car parks as agreed by the Executive Committee on June 2020;
- (iii) the Executive Head of Business, in consultation with the Portfolio Holder, is granted delegated authority to introduce parking reductions and promotions as and when required.

1. Resource Implications

- 1.1 Parking fees were suspended in all car parks on 26 March 2020 in response to the Government lockdown to control the spread of Covid-19. Income from these car parks in Financial Year 2019/2020 from daily fees and season ticket charges and totalled £65,072.
- 1.2 Re-introducing the fees and charges on 16 November 2020 allows Parking Services to give our customers nearly 3 week's notice of the resumption of charges and to arrange new season tickets.
- 1.3 The Parking Subsidy Season ticket has already been advertised formally on all car parks, so again notice period gives low paid workers time to apply for a Parking Subsidy Season ticket. Payment will be electronic using MiPermit online payment system. Customers will be able to pay £10 monthly or £120 annually.
- 1.4 The lifting of the temporary suspension of parking charges in the Pay and Display car parks will enable the council to collect circa £16,268

this financial year.

- 1.5 Free parking for up to 2 hour and at weekends will be available at Bagshot, Chobham, Burrell Road and Watchetts Road car parks.
- 1.6 The proposed tariffs to be reintroduced are shown in Annex 1 to this report.
- 1.7 The provision of a Parking Subsidy Permit Season Ticket at £120 per annum or £10 per month will provide more affordable parking for low paid workers. Issued pro-rata as shown in Annex 2.

2. Key Issues

- 2.1 The Government announced a nationwide lockdown on 23 March 2020 which affected the free movement of people and closing all but essential shops. The Government has since relaxed restrictions a lot of restrictions and customers are returning to our commercial centres.
- 2.2 Customer numbers in car parks across the borough reduced by 90% and on 26 March 2020 SHBC made the decision to temporarily suspend parking charges in all car parks across the borough.
- 2.3 Car park use is increasing in the Pay and Display car parks, with Watchetts Road car park reaching capacity, which is sometimes compounded by inconsiderate parking outside of the parking bays.
- 2.4 Unrestricted parking reduces the amount of parking available for those visiting the shops in this area as the local workers will arrive at the car park before the customers and occupy the majority of the parking bays all day.
- 2.5 Parking charges were reintroduced in Camberley town centre on 14 September 2020, with 2 hours free parking in Knoll Road car park.
- 2.6 Guildford, Woking and Bracknell Forest re-introduced parking charges on 1 July 2020 and Rushmoor reintroduced parking charges on 20 July 2020. A summary of the actions taken by neighbouring local authorities in relation to charging for parking is shown at Annex 3 to this report.
- 2.7 The ongoing impact on market forces by the pandemic will require an increasingly reactive response to parking charges, particularly in the lead-up to Christmas. The ability, via delegated authority, to swiftly implement special discounts and offers to encourage visitors in to our commercial centres on certain days per week would make this possible.

3. Options

- 3.1 The Executive has the options to:

- (i) approve the re-introduction of regular parking charges in the Pay and Display car parks as soon as possible.
- (ii) approve the introduction of a 'Parking Subsidy' Season Ticket at £10 per month or £120 per annum.
- (iii) Grant the Executive Head of Business, in consultation with the Portfolio Holder, delegated authority to introduce parking tariff reductions and promotions as and when required.
- (iv) amend the recommendations in this report.
- (v) reject the recommendations in this report.

4. Proposals

4.1 It is proposed that the Executive:

- (i) approve the suggested reintroduction of charging in the Pay and Display car parks as soon as possible.
- (ii) approve the introduction of a 'Parking Subsidy' Season Ticket at £10 per month..
- (iii) Grant the Executive Head of Business, in consultation with the Portfolio Holder, delegated authority to introduce parking tariff reductions and promotions as and when required.

Supporting Information

4.2 Car park income data was collected from Civica for the financial year 2019/20 for Fees & Charges and Season ticket income.

5. Corporate Objectives And Key Priorities

5.1 Performance: To deliver effective and efficient services better and faster

6. Policy Framework

6.1 This proposal supports Council Recovery Plan.

7. Legal Issues

7.1 There are no legal requirements to advertise the lifting of the suspension of parking fees.

8. Sustainability

8.1 Parking charges need to be re-instated sensitively across the borough

to maintain customer numbers in all our commercial centres.

9. Risk Management

9.1 There is a risk of adverse reaction from public users and businesses in the Pay and Display areas' interests to the re-introduction of charges.

10. Community Safety

10.1 There are no community safety issues.

11. Equalities

11.1 An Equality Impact Assessment is being undertaken and any outcomes from this Assessment will be reported to the meeting.

12. Consultation

12.1 Information signs will be erected in each car park advising the public that charges will be back in place on the given day and this information will be shared on line and on social media.

13. PR and Marketing

13.1 The Council will undertake a wide information campaign to advertise the reintroduction of parking charges in Pay and Display car parks.

14. Officer Comments

14.1 Free parking has been provided in the Pay and Display car parks since 26 March 2020. Customer numbers are increase and with 2 hour free parking in some Pay and Display car parks and the Parking Subsidy Season Ticket, customers will still be able to access free and affordable parking, whilst the Council will receive income to help cover the costs of maintaining these car parks.

Annexes	Annex 1 – Re-introduction of Parking Charges Annex 2 – Details of the Parking Subsidy Season Ticket Annex 3 - Actions taken by neighbouring local authorities in relation to charging for parking
Background Papers	None
Author/Contact Details	Eugene Leal – Parking Services Manager Eugene.leal@surreyheath.gov.uk
Head of Service	Daniel Harrison - Executive Head of Business

Annex 1: Re-introduction of parking charges

Pay and Display Pay and Display Car Parks: Bagshot, Chobham, Burrell Road, Watchetts Road car parks

Category of Charge	Charges
Up to 2 Hours	Free but obtain a ticket
Up to 3 Hours	£0.40
Up to 4 Hours	£0.80
Up to 5 Hours	£1.20
Up to 6 Hours	£1.60
Up to 7 Hours	£2.00
Up to 8 Hours	£2.40
All Day	£2.50
12 months Season Tickets	£375.00
Local Residents (annual)	£100.00
Parking Subsidy Season Ticket	£10 per month or £120 per year

Yorktown car park

Category of Charge	Charge
Up to 2 Hours	£1.00
Up to 5 Hours	£2.50
Up to 10 Hours	£3.00
Annual Season Ticket	£540.00
6 months Season Ticket	£310.00
3 months Season Ticket	£160.00
Parking Subsidy Season Ticket	£10 per month or £120 per year

Surrey Heath House car park

Category of Charge	Charge
Up to 2 Hours	£1.20
Up to 3 Hours	£2.00
Up to 4 Hours	£2.80
Up to 10 Hour	£4.00

Annex 1: Re-introduction of parking charges

Sunday and Bank Holidays only	£1.50
-------------------------------	-------

Wilton Road car park

Category of Charge	Charge
Max Stay 5 Hours, except season ticket holders	FREE
Annual Season Ticket	£300
Parking Subsidy Season Ticket	£10 per month or £120 per year

Annex 2: Parking Subsidy Season Ticket Allocation

The Parking Subsidy Season Ticket will be issued for a specific car park and made available on a pro-rata basis based on the spaces available in each car park as shown in the table below:

Car Park	Total spaces	Pro-rata Allocation of Parking Subsidy Season Tickets
Main Square multi-storey car park –	Not available	Not available
Knoll Road multi-storey car park	606 spaces	82 Season tickets
Bagshot pay and display car park	95 spaces	13 Season tickets
Chobham pay and display car park	96 spaces	13 Season tickets
Burrell Road pay and display car park	60 spaces	8 Season Tickets
Watchetts Road pay and display car park	36 spaces	5 Season Tickets
Yorktown pay and display car park –	137 spaces	18 Season Tickets
Wilton Road car park	83 spaces	11 Season Tickets
Total spaces and available Season Tickets	1113 spaces	150 Season Tickets

This is the initial allocation to ensure every car park has sufficient spaces for other daily visitors and other season ticket holders.

The number of Parking Subsidy Season Tickets issued will be monitored and the use of each car park will be monitored to provide a flexible and appropriate service tailored to each area.

Annex 3: Actions taken by neighbouring local authorities in relation to charging for parking

Council	Initial Response March 2020	Current Arrangements
Surrey Heath	Free in all car parks	Charges from 24 July 2020 in Camberley multi-storey only, with free parking up to 4 hours.
Mole Valley	Free in all car parks	Charges re-introduced on 6 July 2020
Spelthorne	Charge apply, except for NHS/Social Care/Police	Charge applied throughout, except for NHS/Social Care/Police.
Guildford	Free in all car parks	Charges re-introduced on 1 July 2020. One car park providing free parking for support worker until 31 July 2020.
Elmbridge	Free in all car parks	Charges re-introduced on 2 September 2020.
Runnymede	Charging but no enforcement Hospital advised there staff could park free of charge	Charges re-introduced on 6 July 2020. One car park providing free parking for support workers.
Woking	Free in all car parks	Charges re-introduced on 1 July 2020
Epsom	Mostly Free to all	Charges re-introduced on 15 June 2020. Free parking for NHS staff, care workers and NHS volunteer responders
Rushmoor	Free in all car parks	Charges re-introduced on 20 July 2020
Hart	Free in all car parks	Free in all car parks until 1 Aug 2020
Bracknell Forest	Free in all car parks	Charges re-introduced on 1 July 2020.

Night Stop Rough Sleeper Initiative

Summary

A bid made to the government was successful in attracting £90,600 of funding to support setting up an emergency accommodation scheme. The scheme is aimed at stopping people moving to and staying on the streets. The aim is to provide stop gap accommodation to allow for accommodation needs to be assessed and support needs.

It is proposed that a property be provided by the Council for a Night Stop scheme, to be run by a voluntary sector partner.

Portfolio - Support and Safeguarding

Date Portfolio Holder consulted – 1 October 2020

Wards Affected

ALL

Recommendation

The Executive is advised to RESOLVE that

- (i) the Night Stop project be supported;
- (ii) the Night Stop accommodation be provided through re-provisioning of improved accommodation for the Hope Hub; and
- (iii) the final costs and specification for the project be brought to future meetings of the Property Investment Working Group and the Executive for agreement.

1. Resource Implications

- 1.1 The scheme is to be supported by capital contributions from the Council to acquire a property for the Night Stop. The contributions are from affordable housing contributions from developers which can only be used to provide accommodation.
- 1.2 A bid was made to the government to support the costs of developing a Night Stop initiative to support single homeless people and rough sleepers. The bid to the government assumed that the accommodation provision would be managed by a voluntary organisation or other recognised provider with no revenue funding from the Council.
- 1.3 Capital funding is available from existing Council reserves once the recommendations contained in the report are approved. A business case for the Night Stop will also need to be prepared at an early stage of the project. It should be noted that if this scheme as proposed goes

ahead the Council may need to reconsider the issue of ongoing revenue costs in future years.

2. Key Issues

- 2.1 The bid for the initiative predates the Covid19 outbreak but supports the government's ambition to see Rough Sleeping halved by 2022 and ended by 2027. The causes of rough sleeping are many including substance abuse, breakdown of family life and debt. Homeless people and rough sleepers are vulnerable to abuse and exploitation.
- 2.2 In 2019 the annual count of numbers sleeping rough in the Borough rose to from 6 in 2018 to 12 in 2019. This trend reflected the national increase in homelessness and rough sleeping. As at September 2020 there are believed to be 5 people sleeping rough of whom 3 did not seek accommodation during Covid19. There are 13 people on the housing register with no fixed abode and 11 in temporary accommodation who would otherwise be homeless. There will be others that are not known to the Council.
- 2.3 In the period 23rd March to 1st June 2020 the Council accommodated 23 individuals in response to the call to house rough sleepers. A mix of bed and breakfast accommodation, serviced apartments and lodgings secured by the Hope Hub were used. At the end of July five of those housed due to Covid19 remained in temporary accommodation. By end of July 2020 the cost to the Council of housing rough sleepers under Covid 19 was £144,158.99. All of these individuals have now been offered permanent accommodation or have moved on.
- 2.4 For those approaching the Council in an emergency there is often no housing option and no legal duty on the Council to accommodate. This means that while they are provided with advice and assistance to help find a home they are not actually provided with accommodation

3. Options

- 3.1 The options for the Executive are to :
 - (i) Agree to support the Night Stop project
 - (ii) Not to Agree to support the Night Stop
 - (iii) To agree the provision of the Night Stop accommodation through improved accommodation for the Hope Hub
 - (iv) To agree the provision of the Night Stop accommodation through improved re-provisioning of accommodation for the Hope Hub
- 3.2 The Executive is asked to agree the Night Stop project including the provision of the Night Stop with improved accommodation for the Hope Hub

4. Proposals

- 4.1 The proposal is to use money in reserves for affordable housing for the provision of accommodation for the Night Stop. The money is the residual of developer contributions for affordable housing provision after the Connaught Court project has been paid for. The Night Stop project will not be run by the Council and will be managed by a voluntary sector provider, in this instance The Hope Hub. The project will need 24 hour staffing and it is estimated that at least 2.5 staff will be needed.
- 4.2 The final costs and specification for the property will need to be approved by the Property and Investment Working Group and the Executive.
- 4.3 The Council will draw up a service level agreement with the Hope Hub setting out the requirements that the scheme must meet. This will include referrals to come through the local authority for those to whom a duty may be owed under the Homelessness Reduction Act and who have a local connection. The scheme is not a substitute for temporary accommodation and will not be suitable for those who for example are fleeing domestic violence to whom a clear homelessness duty is owed.
- 4.4 The Council will not commit to provide any ongoing revenue funding at this time and the scheme should be self-financing. The Hope Hub will be able to draw down on Universal Credit payments and this provide the necessary funding. For this reason if the scheme attracts those ineligible for this or other public funding, other funding will need to be attracted.
- 4.5 There may be a number of options for provision of the Night Stop accommodation and options considered included: stand-alone modular units, re-provisioning and improvement of the modular accommodation currently occupied by the Hope Hub, acquisition and conversion of a residential property and acquisition and conversion of a commercial property.
- 4.6 Officers have been unable to identify a site immediately available for provision of stand-alone modular units. To date no suitable commercial or residential properties have been identified for acquisition. It is therefore suggested that the preferred approach to be explored is the re-provisioning of the portacabin accommodation occupied by the Hope Hub to include short term accommodation for emergencies.
- 4.7 This option has the advantage of not needing property acquisition and is on land within the control of the Council. Furthermore the Hope Hub accommodation is ageing and has some structural issues. The new accommodation will need planning permission and a contracts will need to be let for preparatory groundworks and the acquisition and construction of the portacabin. The potential for re-use of the existing portacabin will also be looked at as part of this project.

5. Supporting Information

- 5.1 In the 12 months up to 11th September 2020 the Case Officers in the Housing Solutions Team dealt with 496 cases where a household needed assistance because they were legally homeless, threatened with homelessness or had a housing issue that needed advice and assistance to stop it becoming a crisis situation. 87 of these households went on to be owed a Prevention Duty as they were threatened with homelessness in the next 56 days. Of these 67 had their homelessness prevented by the Team's work. 117 households went on to have a Relief Duty, in that they became physically homeless. Of these 30 had their homelessness relieved through the provision of accommodation and a further 55 were provided with temporary accommodation until such time as settled housing can be found for them.

6. Corporate Objectives And Key Priorities

- 6.1 This project supports the objective to build and encourage communities where people can live happily and healthily. In particular, it addresses housing needs within the community.

7. Policy Framework

- 7.1 Policy CP6 of the adopted Surrey Heath Core Strategy and Development Management Policies Document December 2012 advises that the Borough Council will promote a range of housing types and tenures which reflect the demand for market housing and need for affordable housing, including accommodation for specialised needs.

8. Legal Issues

- 8.1 Any legal issues arising, in particular, for the Night Stop provider will be addressed through a Service Level Agreement.

9. Governance Issues

- 9.1 As above.

10. Risk Management

- 10.1 This will be addressed through the SLA with the provider.

11. Officer Comments

- 11.1 The Housing Services Team has been successful over a number of years in securing additional government support for homelessness prevention and relief work (in 20019/20 this totalled £325,939 and in 2020/21 £319,167). This funding is used to both assist individual households to avoid or resolve their homelessness (e.g. through

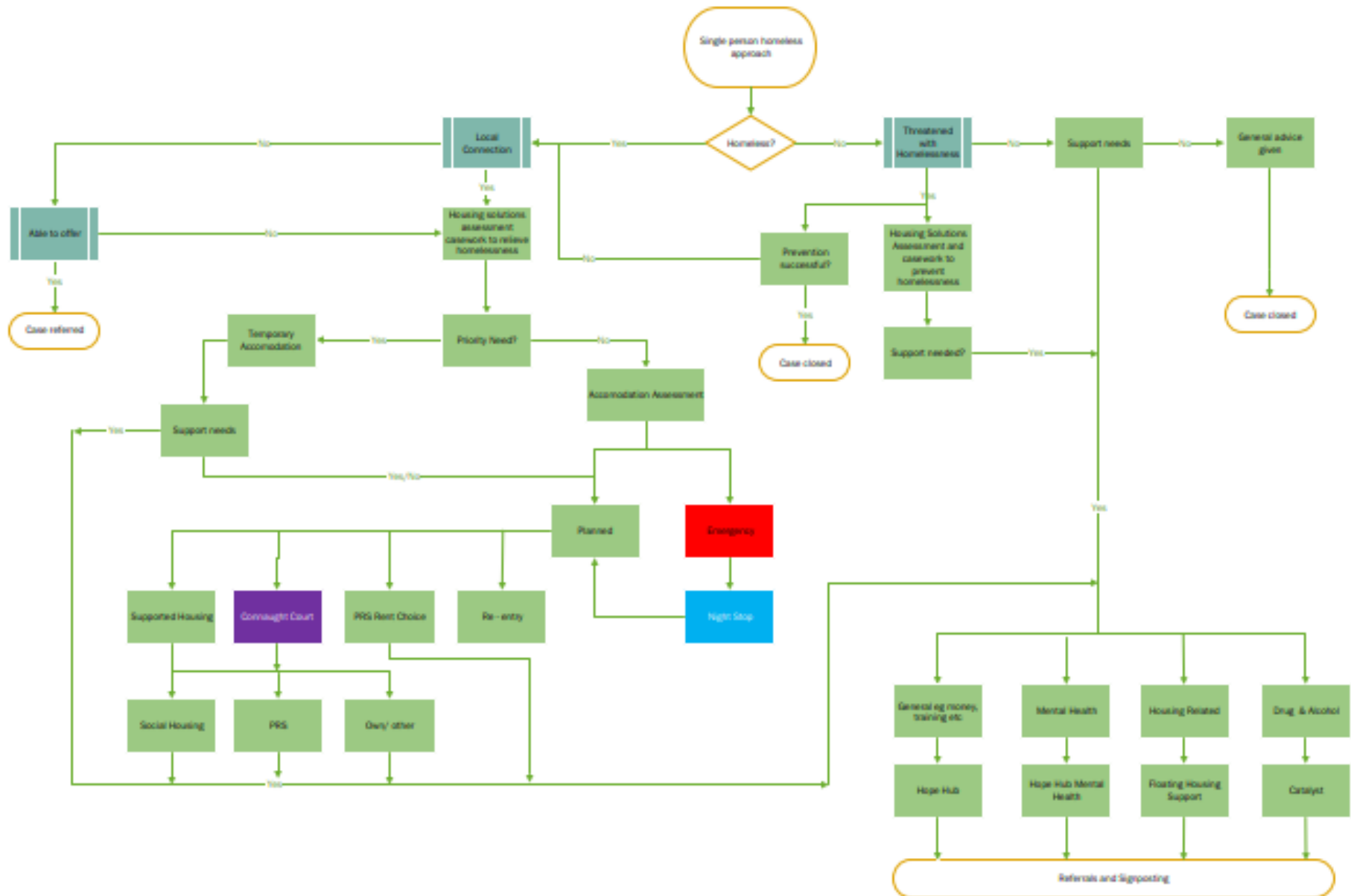
upfront costs to secure alternative accommodation) and for project work (e.g. the scoping work and initial funding that led to the setup of the Hope Hub). This additional funding means the Housing Service has been able to be proactive in it's work to prevent and relive homelessness without the need for growth in core budgets.

- 11.2 The funding streams are awarded annually, are often only announced at the beginning of the financial year and are not guaranteed. This makes it difficult for officers to plan longer term work and it also means longer term revenue commitments to both internally and externally delivered projects is not possible.
- 11.3 The Housing Service has taken to the opportunity to access external funding to enhance it's offer to residents at risk of homelessness in 2020:
- 11.4 Using MHCLG Rough Sleeper Initiative funding and developer contributions the Council has delivered a single homeless persons accommodation scheme. This scheme offers those who are homeless or at risk of homelessness accommodation and support for up to two years in order that they can then move to independence in the community. This provides one of the options for move on from Night Stop; and,
- 11.5 Using Surrey County Council Grant a new Floating Housing Support Service has been set up. This service has a dual function to both support people in their current home, including those who are at risk of homelessness, and to help resettled residents who have been homeless to provide the right support at the beginning of their tenancies to give them the best chance to make it successful.

Annexes	Annex 1 Pathways for single homeless people
Background Papers	None
Author/Contact Details	Clive Jinman – Housing and Homelessness Manager
Head Of Service	Jenny Rickard – Executive Head of Regulatory

:

Single Homeless Pathway



Poverty in Surrey Heath

Summary:

To update on the poverty project and provide an outline plan of the work schedule provided in February 2020.

Portfolio: Support & Safeguarding

Date Consulted: 9 October 2020

Wards Affected: Old Dean, St Michaels and Watchetts

The Executive is advised to RESOLVE that

- (i) a Poverty Working Group be established to oversee the revised plans and schedule for addressing poverty within the borough, as outlined in Annex B to this report;
- (ii) The Poverty Working Group be comprised of community representatives, voluntary sector, Surrey Heath CCG, and Councillors from Old Dean, St Michaels and Watchetts;
- (iii) a ward councillor community fund grant be established, as set out at Annex D to the report; and
- (iv) any underspend from the Hardship Fund approved at minute 110/E at the Executive meeting held on the 24th March 2020 be repurposed for an individual hardship fund, to be administered by Citizens Advice Surrey Heath, and to fund the ward councillor community fund grant scheme for the remainder of 2020/21.

1. Key Issues

- 1.1 At the Full Council meeting on the 9th October 2019, a Council Motion proposed by Councillor Rebecca Jennings-Evans and seconded by Councillor Valerie White asked the Executive Head of Regulatory and Transformation to:
 - (a) Undertake the relevant work to ascertain the level of poverty across the above areas in Surrey Heath and factors that are causing this;
 - (b) Determine what action the council can take to alleviate the problem where poverty exists in Surrey Heath, either independently or through collaboration with its external partners; and
 - (c) report on these matters to the Executive in early 2020 at the latest.

- 1.2 At its meeting on 18 February 2020, the Executive considered a report on Poverty in Surrey Heath. At this meeting it agreed that a study would be undertaken to identify and understand the community groups, including statutory services where appropriate, that operated in St Michaels and Old Dean; this would help understand what services were currently offered and what more was required to support those living in poverty. An outline action plan would then be produced that could address this inequality, together with clear improvement measures.
- 1.3 It is recognised that the impact from the pandemic has affected universally and the previous poverty landscape is subject to change. The Government Furlough scheme has shielded the true picture of this local effect on our economies, and the loss of employment and the full extent of this will become clearer over the next few months.
- 1.4 The Hope Hub withdrew from this project to focus on delivering a frontline service to the homeless during lockdown.
- 1.5 A Poverty Working Group comprising of community representatives, voluntary sector, Surrey Heath CCG, Councillors, and officers is intended to progress this work. It is proposed that a revised project scope is adopted due to the expectation that the poverty landscape will be radically changed post Covid.
- 1.6 It is proposed that the Poverty Working Group reviews the data and information outlined within the Citizen Advice Report from Joseph Harley published in June 2020, on Universal Credit, 18 months on, attached as Annex A.

2. Resource Implications

- 2.1 The Poverty Working Group with the Executive Head of Regulatory and Executive Head of Transformation will oversee this project and any external research that is required will be funded within the approved Regulatory and Transformation budget for 2020/2021. This includes the repurposing of the hardship fund and the setting up of a ward councillor community fund.

3. Options

- 3.1 The Executive is advised the RESOLVE that the Poverty Working Group oversee the revised plans and schedule as outlined in Annex B

4. Proposals

- 4.1 The Poverty working group attach revised plans and schedule for consideration by the Executive in Annex B

5. Supporting Information

- 5.1 The Council has a long history of working collaboratively with its partners to identify and address local issues and priorities; the social prescribing service is an excellent example of this.
- 5.2 A key indicator previously used to identify Poverty and its impact is the Index of Multiple deprivation (IMD). The latest data from 2019 shows that in Surrey Heath we have five key super output areas where statistical measures are closer towards the worst 10% (1st decile).

These cover the areas in St Michaels, Old Dean and Watchetts wards, as detailed in a background paper. Each Super Output Areas (SOA) focus on 3/4 roads within the ward, not the whole area, an example of this is 008A, which relates to Chapel Road, St Michaels Road, Avenue Sucey and Surrey Avenue. The IMD source features several factors, which are not purely financial. It is acknowledged that although the IMD information is a useful start point, post Covid the poverty landscape will be vastly changed and careful consideration of any future action plan is crucial.

- 5.3 The St Michaels Community Group and Old Dean Community Group entered in to a dialogue whereby they share ideas and good practice to maximise their effectiveness, and it is suggested that they form a working party to oversee the development of an outline poverty plan for Surrey Heath as revised in Annex B.

6. Corporate Objectives and Key Priorities

- 6.1 This project supports the objective of building and encouraging communities where people can live happily and healthily. In particular, this project will be delivered through work with partners and aims to put in place measures that will improve the health and wellbeing of the community.

Annexes	Annex A – Universal Credit, 18 Months on – Citizens Advice Surrey Heath – Joseph Harley Annex B – Revised project scope and Research proposal Annex C – Researcher notes from telephone conversation 04/09/2020 Annex D – Criteria for Ward Councillor Community Grant
Background Papers	Localised IMD Data 2019
Author/Contact Details	Jayne Boitoult - Community Partnership Officer jayne.boitoult@surreyheath.gov.uk
Service Managers	Louise Livingston - Executive Head of Transformation Jenny Rickard – Executive Head of Regulatory

Revised project scope – October 2020

1. Establish a Poverty Working Group to oversee the plans and schedule for addressing poverty within the borough,
 2. The group appoint a Chairman from the membership which comprises of community representatives, voluntary sector representatives, Surrey Heath CCG, Councillors from Old Dean, St Michaels and Watchetts, Citizens Advice Surrey Heath, and a faith representative.
 3. To agree the scope a hardship fund from the repurposing of the allocated budget (approved in item 13.b at the Executive meeting held on the 24th March 2020) to be available from November 2020 to coincide with the withdrawal of the Government furlough scheme.
 4. To establish a new fund for a Ward Councillor Community Fund, an outline criteria for this fund can be found in Annex
-
5. Analyse the data from the universal credit, 18 months on compared with the further data from Citizens Advice (to be supplied) that will be used as a basis to support a partnership approach to alleviate in areas of most need.
 6. To introduce a communications campaign in October 20 to clearly promote the services available to assist during times of hardship.
 7. To continue to fund our local foodbanks by utilising the DEFRA funds.
 8. To continue to support crucial services through the Council revenue grant Scheme: i.e. Citizens Advice, Camberley job club and IT connect service, for those looking for work and requiring digital training via The Hope Hub.
 9. To host a community and statutory partner stakeholder event in December 2020 to identify the longer-term partnership plans to provide support in this area. To report back to the February 2021 Executive setting out these plans:

Researcher notes from telephone conversation 04/09/2020 – undertaken in February/March 2020

St Michaels

Mags Mercer met with community representatives in March and visited Southway, Avenue Sucey, Surrey Avenue and Chapel Road etc. with Rev Bruce Nicole and Kim Murray. They observed the ward has very little green space, for people to meet and congregate. In the past, a community flat has been utilised for this purpose but after an initial surge, it fell in to disuse and was closed due to this reason. Accent also created a community garden for blocks of flats and the residents do not look these after.

The multi-use gaming area still exists but seems to be unused.

Feedback from some residents is that they do not buy-in to the area as they see it as a stepping-stone to a house, although this is a common myth.

The community garden that had been used to grow vegetables at one time seems to have fallen in to disuse.

The St Michaels Project and St Michaels Church jointly funded a part-time community worker to engage with the community, which did work well, but when this was withdrawn, the momentum has dwindled over a period of time.

Old Dean

Lots of green space for people to meet, and play. The Council is replacing the play area. Recently, some social housing property has been purchased privately with the owners using this as a base for work purposes, and are not interested in becoming actively involved within the local community. Initial discussions are underway between SCC and community groups to provide a community hub in the shopping parade.

Watchetts – No visit undertaken.

Community Fund Grant Criteria – Ward Councillors

A sum of £1500 will be made available for each ward councillor to award according to the criteria set out below.

Note:

- Year 1 (2020/21) the sum will be pro-rata to £1000
- Leader of the Council receives £3000 a year pro rata year 1 to £1500

Criteria to be applied:

1. Must be used to address a specific corporate priority for example poverty, climate change, partnership working etc.
2. It cannot be used for any party political or campaigning purposes nor for the purpose of denigrating the Council.
3. Must be to a specific group, event or activity rather than directly to an individual.
4. The group must have a constitution and bank account with at least two signatories.
5. A Councillor cannot fund a group or activity if they are a trustee or on the management committee or their household or immediate family (parent, child, brother, sister, steps.)
6. Maximum grant of £500 per application.
7. Applications to be via a very simple 1 page form on the Council website with set fields that need to be completed including endorsement from the ward Councillor.
8. A Councillor can make awards outside their ward but the ward councillors should be made aware. All awards should be in Surrey Heath Borough.
9. The applications will be administered by Community Partnership Officer and the Executive Head Transformation before being processed for payment by Finance. Any that are questionable are referred to Portfolio Holder or Leader if PH is conflicted for a final decision.
10. The budget will be monitored by the Executive Head Transformation in consultation with the Finance department.
11. All successful bids are then reported to the Portfolio Holder on a monthly basis and annually to the Executive and Performance and Finance Scrutiny Committee.
12. During a Councillors term in office unused funds can be carried over. At the end of a Council term all funds will be cancelled.

IMD Data 2019

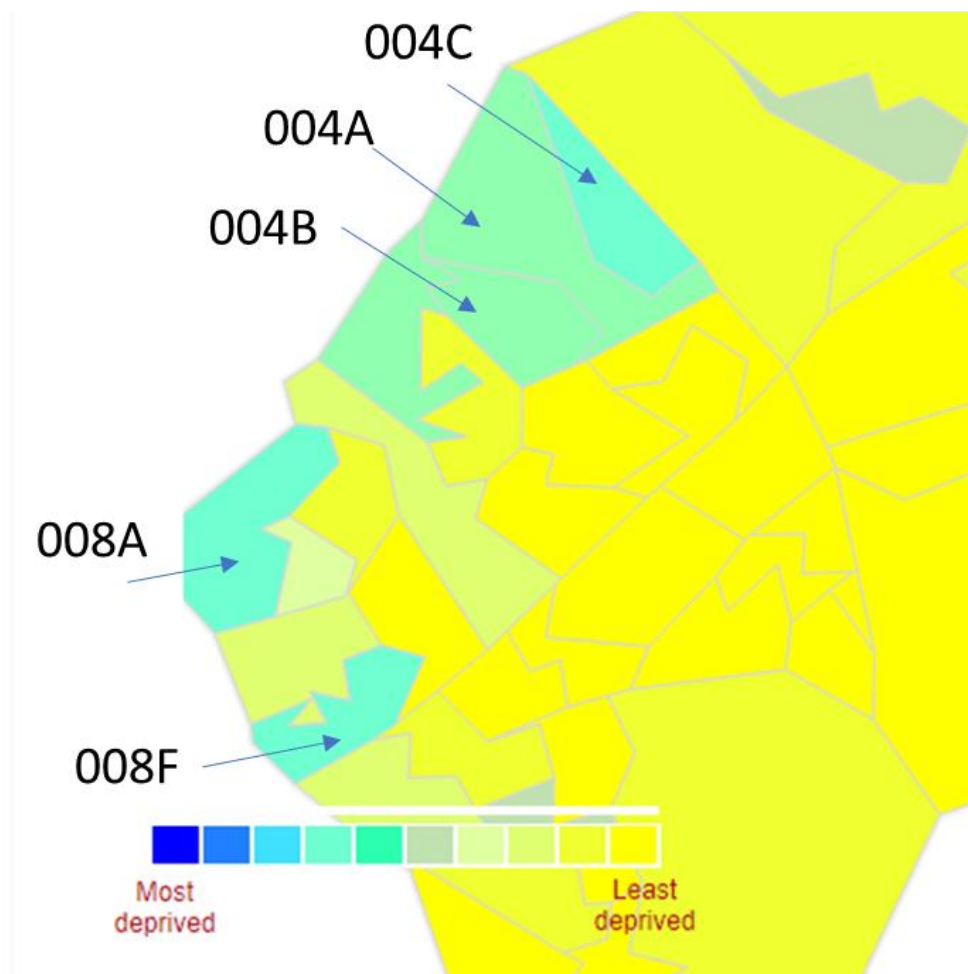
004A- Highview Crescent, Berkshire Road, Horseshoe Crescent, local issues recognised by ODCoG: education, skills, training, income, older people, children.

004B – Turf Hill Road, Lorraine Road, Cordwalles Cres, Pascal Road, Deanside, local issues recognised by ODCoG: education, skills, training.

004C – Mitcham Road, Mitcham Close, Esher Road, Bracknell Road, local issues recognised by ODCoG: education/skills/training, income, Employment, children, older people.

008A - Chapel Road, St Michaels Road, Avenue Sucy, Surrey Avenue and South way), local issues recognised by St Michaels group: living/environment, income, education/skills/training, disability older, people.

008F – St James Road, Bain Avenue, Wood Road, Greenlands Road: local issues: education, skills, training.



This page is intentionally left blank

Universal Credit, 18 Months On

Assessing the impact of
Universal Credit in Surrey
Heath, 18 months after its
introduction



**Surrey
Heath**

Published June 2020

Joseph Harley

Contents

Executive Summary	3
Why have we done this research?	3
How have we conducted this research?	3
Key findings	3
Key recommendations	4
Introduction	5
Section One: How UC works	5
Payments	6
Waiting time	6
Section Two: Financial issues and food poverty	7
Issues with the five-week wait time and the 'debt trap'	7
Case Study: Linda	8
Deductions	8
Vulnerability of legacy benefit claimants to the five-week wait	9
Issues with eligibility	9
Case Study: Margaret	10
Case Study: Nicola	10
Issues with the payment schedule	11
Case Study: Tom	12
Inconsistent work can harm claimants	12
Changes to self-employment rules during the COVID-19 pandemic	12
Weekly pay	13
Increases in local food bank use	13
Section Three: Housing issues	14

Shortfall between benefit rates and local rents	14
Issues for new claimants	15
Problems with direct payment of rent to landlords	15
Case Study: Karen	16
Private landlords and UC claimants	16
The local social housing perspective	18
Advantages of legacy benefits	19
Section Four: Issues for claimants with complex needs	19
Issues with money management	20
Medical assessments	20
Support with legacy benefits	21
Section Five: Accessibility	21
General levels of digital skills	21
UC claimant's digital skills	21
Experiences with the online UC system	22
Groups with less access to the online UC system	23
Our experience	24
Case Study: Shobal	24
Conclusion	24
Appendix 1: Recent changes to UC as a result of COVID-19	26
Appendix 2: Research Methodology	26
Bibliography	27

Executive Summary

Why have we done this research?

It has been over eighteen months since Universal Credit (UC) was fully rolled out in Surrey Heath. Citizens Advice Surrey Heath (CASH) has been heavily involved in supporting UC claimants and we want to assess what its impact has been now that it has had time to take effect.

How have we conducted this research?

We have used both our own experiences and interviews with various local organisations who have also been heavily involved in supporting UC claimants to inform our analysis. We have also used publicly available research by third parties and government statistics.

This report is not intended to be a comprehensive, national analysis of UC and its issues. Various publications from national Citizens Advice already provide this and their work on UC continues to contribute a great deal to national policymaking. Instead, we hope that this report gives readers an idea of the local picture of UC in Surrey Heath, through the eyes of organisations that directly support local claimants.

You can find full details in **Appendix 2**.

Key findings

UC has contributed to increased financial issues for many of the benefits claimants that CASH helps.

- The five-week wait for the first payment can cause significant problems for some claimants, including causing them to fall into debt soon after claiming
- Work does not always ensure that claimants are better off
- Local food bank use is increasing, with providers asserting that the introduction of UC has been a contributing factor

It has also caused issues regarding housing in particular

- There has been a longstanding shortfall between UC payments and claimant's housing costs, which has only been acted on very recently
- Various local stakeholders report that the system for directly paying claimants' housing money to their landlords does not work as effectively as it should
- It has been reported that significant numbers of local private landlords do not seem confident in UC's ability to ensure that tenants claiming it can pay their rent, and have become less willing to let to benefits claimants in general

New claimants who were previously receiving the 'legacy benefits' replaced by UC are particularly vulnerable.

In addition, it is clear that many UC claimants have complex issues and require more support with managing their affairs.

However, it is important to note that CASH, and all of the organisations we spoke to for this report, were supportive of the basic principle of UC. All agreed that the simplification of the legacy benefits system, encouraging claimants to work and promoting greater financial responsibility are laudable goals.

We are not advocating the abolition of UC but a number of key changes that will enable claimants to be more financially resilient and improve their chances of maintaining their accommodation and not slipping into unmanageable debt.

Key recommendations

- For those moving from legacy benefits to UC, we welcome the upcoming introduction of a two-week run-on for Job Seeker's Allowance, Employment and Support Allowance and Income Support in July 2020 as a major step in the right direction. However, we feel that a similar run-on for those on Tax Credits would cover the last major gap in legacy benefit provision over the UC waiting period
- A more flexible approach should be taken towards claimants being able to establish different payment schedules and assessment periods in order to better reflect their work experience and make it easier for them to budget. Greater efforts should also be made to increase awareness of existing options to modify payment schedules
- Funding from DWP to provide ongoing support, for UC claimants who struggle with managing their money, to improve their longer-term financial resilience and confidence.

Even with our very local perspective we are confident that these changes could make a significant difference to UC and the lives of individuals that claim it in Surrey Heath and across the country.

Introduction

The introduction of Universal Credit (UC) in 2013 has proven to be one of the biggest changes to the welfare system in decades. Surrey Heath became a 'full service area' for UC in November 2018, and as of 9th January 2020 there were 2,841 individuals claiming UC through Camberley JobCentre Plus¹.

Citizens Advice Surrey Heath (CASH) has been heavily involved in supporting UC claimants throughout this period. We have provided assistance on all aspects of UC claims, from their initial submission through the Citizens Advice 'Help to Claim' scheme, to supporting claimants experiencing issues with their payments.

UC has helped significantly in simplifying the welfare system and its aim of ensuring that claimants are always better off in work is laudable. The flexibility in its calculation complements this by ensuring that claimants can enter and leave work without their claim ending, with their payments instead being recalculated on an ongoing basis to top up their income.

On paper UC is an excellent change to the welfare system. However, various issues with its administration can cause its claimants serious problems.

The negative impacts of UC on Surrey Heath residents can be broken down into three key areas:

1. UC has contributed to increasing financial deprivation and food poverty.
2. It has exacerbated issues with finding and paying for housing.
3. UC has left numerous individuals with complex needs struggling to manage their affairs due to the increased demands placed on them by the system.

Section One: How UC works

UC is now the standard working-age benefit. It has replaced six existing benefits, which will collectively be referred to as 'legacy benefits'. No new applications can be made for these benefits in normal circumstances. Once someone claims UC they cannot receive legacy benefits and their payments will immediately stop. The only exception currently is Housing Benefit, which will carry on for two weeks after a UC application is made. For now, legacy benefit claimants are not being forced to claim UC instead, but if they

¹ Department for Work & Pensions (2020). Universal Credit: Official Statistics. Department for Work & Pensions. Figure from 9th April 2020.

experience a change of circumstances (a new partner moving in, for example) then they may have to move to UC.

Payments

UC is made up of several 'elements' or payments. Every eligible claimant is entitled to the 'standard' element and can get other elements on top of this to help with meeting the costs of housing, childcare and if the claimant and/or their child(ren) is disabled.

Payments of UC are normally made every month. The four-week gap between each payment is called the 'assessment period', during which the DWP will use data from HMRC (Her Majesty's Revenue and Customs) to calculate how much UC the claimant will get in their next payment. If the claimant has capital and/or is earning above a certain amount then this will reduce their UC award, but not at an equal rate, so in theory claimants are always better off working.

Once their UC payment has been calculated the claimant gets about a week's notice and will then receive this amount as a lump sum. However, if claimants are having significant issues with managing their finances they are able to apply for an APA (Alternative Payment Arrangement). The two most common types of APA are the direct payment of a claimant's housing element (the UC element for housing costs) to their landlord and to be paid every two weeks rather than every four. There are strict rules on when claimants can apply for these and their availability is restricted.

During the Covid-19 crisis, the UC standard allowance received an increase of £20 a week. This constitutes a very significant increase in the incomes of all UC claimants and is a simple, very welcome change that has helped many people.

Waiting time

Once a UC application has been made the claimant has to wait five weeks for their first payment. Claimants do not receive any 'backdated' money for this period in future payments. In order to tide claimants over for this time the DWP offers the option of taking an Advance Payment. This is a loan which it will recover by deducting money from the claimant's subsequent payments for up to a year. This repayment period is due to be extended to two years in October 2021. Money can also be deducted from payments for other debts, such as court fines.

Section Two: Financial issues and food poverty

CASH has supported numerous UC claimants experiencing financial issues. Nationally, a significant proportion of claimants also appear to be experiencing similar problems. Citizens Advice research at the national level shows that over 75% of UC claimants have priority debts². Furthermore, 55% of UC claimants went without essentials at some point between September 2018 and September 2019.³ Life on benefits has never been easy, but the evidence appears to show that UC claimants are more likely to experience financial hardship than legacy benefit claimants. Here are some statistics to illustrate:

Financial Issue	% of legacy benefit claimants experiencing this issue	% of UC claimants experiencing this issue
Council Tax arrears	38%	55%
Rent arrears	27%	43%
Gone without essentials in the past year	37%	55%

Issues with the five-week wait time and the ‘debt trap’

It is clear that specific features of UC can cause its claimants to experience financial difficulties. The problems can begin early, with the five-week wait for the initial payment. Local charities, CASH, Frontline and the Hope Hub all report that this can create a ‘debt trap’ in which significant numbers of claimants are forced to take an Advance Payment as they cannot stretch their finances for this long, thereby being forced immediately into debt and experiencing deductions from their UC payments for up to the next year⁴. The size of these deductions was a frequent cause for concern. Accent housing authority and Surrey Heath Borough Council said they actively advised against taking out an Advance

² Hobson, F., Kearton, L., and Spoor, E. (2019). Managing Money on Universal Credit: How design and delivery of Universal credit affects how people manage their money. Citizens Advice. Pages 15-16

³ Citizens Advice (2019). Ensuring income security for all. Citizens Advice. Page 4

⁴ Interviews with Frontline and the HopeHub

payment, even in cases of real need, due to the subsequent deductions causing repeated instances of financial hardship later down the line. They instead prefer to tide claimants over with emergency grants or 'substitutions' for income, such as food bank referrals to cover food costs⁵.

CASH have seen many instances of clients using the advance payment to pay off debts or purchase items of furniture, leaving them without money for food in the five-week period until the first payment is made.

The March 2020 budget extended the period over which Advance Payments are recovered from one year to two years. This is a welcome development, but does not fundamentally solve the problem and is only due to take effect in October 2021.

Case Study:



Linda made a claim for Universal Credit following the death of her husband. She took an Advance Loan of £500 to pay for essential items for her five children, not realising that the repayments would be deducted from her ongoing award. As Linda was also subject to the benefit cap the deductions left her reliant on a foodbank. She also fell behind with other essential bills.

Deductions

The fact that local officials feel the need to sidestep the official provisions made by the DWP indicates that there is a significant problem here. In addition, CASH and Frontline feel that, from our experience, the DWP can fail to give sufficient regard to the affordability of deductions or properly maintain internal communications between the various departments managing different types of deduction. This means that some claimants can end up experiencing multiple deductions, each applied without consideration of the others, reducing their UC payments to an unsustainable level in what Frontline call an 'unjust and unhelpful' system⁶.

The March 2020 budget has produced some improvement in this regard, with the maximum deduction for debts being lowered to 25% of a claimant's standard element, down from 30%. However, this change is not due to take effect until October 2021.

⁵ Interviews with SHBC and Accent staff

⁶ Interview with Frontline

As a result of measure put in place during the Coronavirus pandemic, the deductions system has been changed in several respects. The DWP has announced that all deductions for previous benefits overpayments and Social Fund loans are suspended until at least 1st July 2020. Furthermore, deductions for rent arrears, council tax arrears and service charges have been suspended. The changes go some way towards stabilising claimant's incomes and for some claimants increases their payments significantly at a time when they are likely to be vulnerable. The changes to deductions are particularly welcome; however, they are likely to be temporary measures.

Vulnerability of legacy benefit claimants to the five-week wait

It appears that people previously claiming legacy benefits are particularly vulnerable to UC causing them financial hardship. All legacy benefits stop immediately after submitting a UC claim, but UC claimants previously on legacy benefits still have to wait a minimum of five weeks for their first payment. This means that legacy benefit claimants moving to UC currently lose any income from benefits for five weeks (except for a two-week Housing Benefit run-on). This loss of income can be disastrous for people's finances at a time when they could be in a vulnerable situation anyway due to the change of circumstances that prompted them to claim UC in the first place (such as job losses, relationship breakdowns or illness). The upcoming implementation of a two-week run-on for Job Seeker's Allowance, Employment and Support Allowance and Income Support in July 2020 will help significantly in mitigating this, but even with these changes Tax Credit claimants could still be left in a difficult position.

New claimants of UC who did not receive legacy benefits also face the five-week wait, but in CASH's experience these claimants are more likely to be claiming after a job loss and so have received notice and some sort of final payment from their employer before they claim. This helps tide them over until their first payment, whereas claimants reliant on legacy benefits often have their income affected more suddenly.

Issues with eligibility

In the most unfortunate cases, legacy benefit claimants can submit a UC claim, thereby losing their legacy benefits, and then be found ineligible for UC for a number of reasons (such as failing to satisfy the residency requirements). This leaves the individual in question unable to access UC, having already been left waiting for the DWP to decide their eligibility, and unable to make a new claim for legacy benefits either. This produces a particularly dire situation that we know has affected some of the individuals that we support.

Case Study:



Margaret applied for Universal Credit when her husband had an accident that prevented him from working. After 4 weeks their claim was rejected on the basis that they did not satisfy the right to reside requirement, despite Margaret having settled status under the EU Settlement Scheme. Citizens Advice assisted Margaret in requesting a Mandatory Reconsideration. It took two months for this review to finish and resulted in Margaret's Universal Credit claim being accepted. During this time Margaret and her family were forced to survive on Child Disability Living Allowance and Carer's Allowance, and they were also threatened with possession action on their rental property.

Case Study:



Nicola had been on legacy benefits for many years. Having moved into sheltered accommodation she needed to apply for Universal Credit, as her previous Housing Benefit claim was with another borough council. Her initial application was rejected due to an error during the processing of the application, which had flagged that Nicola was getting a disability premium on her ESA which made her ineligible for UC. Citizens Advice spoke to the DWP to correct the error, but Nicola was required to submit a new application and a Mandatory Reconsideration to ensure that she was paid the correct amount of benefit. Whilst Nicola waited on her new UC application she had to rely on a local foodbank and charitable help from the Surrey Crisis Fund.

Issues with the payment schedule

Differences in the payment schedule of UC and legacy benefits can also cause claimants difficulties. As explained above, UC is paid every month by default, and a fortnightly payment can only be arranged in exceptional circumstances (the most common being having rent arrears and/or debt, having an addiction or being disabled) and after a direct payment to the claimant's landlord has been set up (due to the 'hierarchy' of APAs)⁷. The DWP guidance does permit APAs to be established in a different order, but in the experience of Frontline and CASH this flexibility is rarely utilised⁸. Legacy benefits are often paid fortnightly or weekly. This means that many claimants are not used to budgeting over a longer period and the change to monthly payments can seriously disrupt their finances.

Locally, use of fortnightly payments is extremely low. Between November 2018 and February 2020 just 0.64% of individuals claiming UC through Camberley JobCentre had their UC paid fortnightly⁹. By contrast, over the same period around 28% of UC claimants in Scotland had their UC paid fortnightly using the 'Scottish Choices' scheme¹⁰, which allows new and existing UC claimants to choose during the application process or later whether they want their UC paid monthly or fortnightly (unless it is deemed unreasonable to do so). Whilst it is obvious that Scotland and Surrey Heath are very different places, the much greater uptake of fortnightly payments when they are offered by default in Scotland suggests that there is both a local lack of awareness of the option for fortnightly payments and potential for many local claimants to take up the offer of fortnightly payments if offered them more proactively.

⁷ Department for Work & Pensions (2019). Guidance: Alternative Payment Arrangements. Department for Work & Pensions. Section 1.2

⁸ Interview with Frontline

⁹ Department for Work & Pensions (2020). Stat-Xplore. Department for Work & Pensions. Available at: <https://stat-xplore.dwp.gov.uk/webapi/jsf/dataCatalogueExplorer.xhtml>

¹⁰ Ibid

Case Study:



Tom's Employment and Support Allowance (ESA) stopped when he failed to attend a medical assessment. He appealed and the ESA decision was over-turned, but because he could not afford to live without benefits in the seven months pending his appeal he made a claim for Universal Credit. Having been on legacy benefits for many years Tom was used to a two-week payment cycle. He struggled to budget on Universal Credit's monthly payment cycle and built up council tax arrears, fell behind with his gas and electricity and borrowed money from family and friends to survive. When he came to Citizens Advice we helped him request Alternative Payment Arrangements, which have helped stabilise his financial situation and enabled him to budget more successfully.

Inconsistent work can harm claimants

One of the primary aims of UC is to ensure that 'even small amounts of work pay and [are] seen to pay'¹¹. However, this is not always the case in Surrey Heath and in reality the benefits of working whilst on UC, at least in terms of guaranteeing a stable income, can be dependent on what sort of work the UC claimant is in. The Hope Hub and SHBC both report that whilst UC can work well to supplement the income of workers in regular work with monthly pay, for workers in inconsistent work (such as those on zero-hours contracts) the results can be very different. This is also reflected in the clients seen by CASH. High hours in an assessment period will reduce the claimant's next payment, which can cause financial issues if their hours reduce and their salary falls. Inconsistent work can therefore make claimant's income from UC fluctuate significantly, and this combined with receiving just one week's notice of the size of their next payment can make it very difficult for UC claimants to budget properly¹².

Changes to self-employment rules during the COVID-19 pandemic

The government has introduced some changes to help self-employed people on UC during the Covid-19 crisis. Work Coaches now have the power to remove or reduce any self-

¹¹ Department for Work and Pensions (2013). Universal Credit Evaluation Framework. Department for Work and Pensions. Page 6.

¹² Interviews with the HopeHub and SHBC

employed claimant's minimum income floor until further notice. Claimants with very low earnings from their self-employment stand to benefit from this change at a time when many self-employed people have been having a particularly difficult time, particularly with government support for the self-employed starting later than the Coronavirus Job Retention Scheme introduced to safeguard employees. Again, this is likely to be a temporary measure.

Weekly pay

All of the organisations that contributed to this report also noted the prevalence of weekly pay amongst the UC claimants that they supported. In CASH's experience some of these UC claimants can prove to be vulnerable to the same budgeting issues experienced by some legacy benefit claimants moving to UC.

Increases in local food bank use

Perhaps the clearest indicator of financial deprivation is food bank use. National research from the Trussell Trust, the UK's largest food bank network, concludes that there is substantial evidence that the introduction of UC has contributed to increased food bank use¹³.

Camberley BESOM is the main provider of Surrey Heath's food bank services and agree with this position. Their statistics show that the number of referrals they made in the six months after Surrey Heath became a full-service area for UC in November 2018 was significantly higher than in the previous six months, from a mean average of 72.5 per month to 87.3 per month¹⁴.

The vast majority of referrals made to BESOM by CASH, and other organisations, are for UC claimants and are prompted by some sort of issue with a client's UC. The five week wait for the first payment stands out as a key problem. A substantial portion of these UC claimants are in work. BESOM report that many claimants have no meaningful financial security and can be pushed in to requiring a referral by any small change of circumstance. Illness - even a short bout - was highlighted as a significant issue in this regard. Claimants migrating from legacy benefits were also identified as being particularly at risk. BESOM were clear that these issues of extreme financial insecurity

¹³ Blenkinsopp, J., Bramley, G., Fitzpatrick, S., Littlewood, M., Sosenko, F., and Wood, J. (2019). State of Hunger: A study of poverty and food insecurity in the UK. The Trussell Trust. Page 12

¹⁴ Statistics from BESOM

were much more pronounced under UC than legacy benefits and that, in their opinion, UC is contributing to an increasing need for food bank referrals in Surrey Heath¹⁵.

That said, it is important to note that research indicates that factors beyond the benefit system, such as a lack of growth in earnings from work over the past few years, are also important in prompting people to seek support from food banks¹⁶.

Section Three: Housing issues

The next key impact of Universal Credit in Surrey Heath has been making it even more difficult for benefits claimants to find housing in the area. Lack of housing, particularly affordable housing, is already recognized by policymakers as a significant issue in both Surrey Heath and Surrey in general¹⁷, and it appears as though UC is not always helping its claimant's housing situation as much as it could do.

Shortfall between benefit rates and local rents

Since 2008 the amount of money that benefits claimants can receive to put towards private housing costs has been governed by the Local Housing Allowance (LHA). Between 2011 and April 2020 this was decoupled from rents. This led to an increasing shortfall between claimant's housing costs and their benefits payments, which regularly caused claimants significant financial issues. UC claimants in Surrey Heath essentially faced the choice of having to significantly top up their rent from their 'normal' benefits each month, be priced out of the vast majority of local private sector housing or fall behind with the rent and risk eviction. To illustrate, between April 2017 and April 2020 the average shortfall between the maximum LHA for a two-bedroom property and the rent for a two-bedroom property at the 30th percentile rent in Surrey Heath was approximately £113 per month¹⁸. Furthermore, if someone was to rely only on the LHA

¹⁵ Interview with BESOM

¹⁶ Blenkinsopp, J., Bramley, G., Fitzpatrick, S., Littlewood, M., Sosenko, F., and Wood, J. (2019). *State of Hunger: A study of poverty and food insecurity in the UK*. The Trussell Trust. Page 57.

¹⁷ Surrey County Council (2017). *Interim Local Strategic Statement for Surrey 2016-2031*. Surrey County Council.

¹⁸ Valuation Office data, 2017-2020. See Bibliography for each individual source. Surrey Heath sits at the intersection of three different Broad Rental Market Areas (BRMAs) for the purposes of the setting of each LHA rate (which differ by area) – Blackwater Valley, Guildford and Thames Valley East. Shortfall figures from these three BRMAs from April 2017 to the present have been used to calculate this mean average.

to afford their rent then they would have been able to afford approximately 3.33% of two-bed properties in the area at the 30th percentile rent¹⁹. In addition, this shortfall interacted with the Managed Payment To Landlord system (which we will discuss later) to produce a situation where claimants could end up unknowingly falling into arrears because they thought that their rent was being taken care of automatically, whereas in reality it did not cover the full amount.

However, things have changed recently. As part of its response to COVID-19 the government recently announced that as of April 2020 it was recoupling the LHA with 30th percentile rents. This is a very welcome development for numerous benefits claimants that CASH supports, who for years have been struggling with inadequate support for their housing costs. However, given how expensive the measure could prove to be its sustainability is unclear.

Issues for new claimants

Unsurprisingly, it seems as if difficulties are particularly pronounced when people first claim for UC. The housing element of UC can take several weeks to set up even on top of the initial five-week wait, which can leave claimants to shoulder significant rent costs themselves. SHBC say that they find that this causes claimants to miss their first rent payment after applying for UC almost by default²⁰.

Problems with direct payment of rent to landlords

UC claimants can encounter serious issues paying the rent themselves, which under UC is the default arrangement for paying housing costs. Unfortunately, the system for implementing a Managed Payment to Landlord (MPTL) under the APA system, by which a claimant's UC housing element is paid directly to their landlord when they have issues paying the rent themselves, has significant problems too. The local letting agent we spoke to said that it took a significant amount of time to arrange a MPTL when tenants were in difficulties with landlords having to wait 8 weeks to receive their payment.²¹

¹⁹ Calculator from the Bureau of Investigative Journalists; full details of said page are in the **Bibliography**. We input postcodes for the three BRMAs mentioned above, so given the size of these areas the these percentages may not be completely accurate for Surrey Heath itself. They do, however, serve as a useful indicator. Figure accurate on 15th February 2019.

²⁰ Interviews with Frontline and SHBC

²¹ Interviews with Frontline and a local letting agent

National research for the Residential Landlords Association shows that the average time taken for an APA was 8.5 weeks²².

Furthermore, the DWP guidance for establishing an MPTL states that if a claimant wishes to establish one because they have or are worried about rent arrears they can only do so if they already have two months' worth or more arrears or underpayment.

There are other provisions for exceptional circumstances, but no option for one to be requested purely because the claimant thinks it would help them²³. These rules are in place despite the fact that a tenant having two months' worth or more of rent arrears is a mandatory ground for eviction (meaning that if it is proven in court, a judge must evict the tenant) under the Housing Act 1988²⁴. With the 8.5-week average wait time factored in the MPTL system can therefore produce situations where claimants can end up in four months' arrears whilst waiting for the system to kick in and help them.

Case Study:



Single mum Karen claimed Universal Credit after her daughter left education at 16. She had previously been in receipt of Housing Benefit, which had been paid direct to her landlord. She wasn't aware that the housing element of UC would be direct paid to her and therefore did not make any rent payments for three months, putting her tenancy at risk.

Private landlords and UC claimants

Problems with UC meeting claimant's housing costs appear to have had a broader impact on the willingness of private landlords to let to tenants on UC. Here are some statistics to illustrate the problem:

- Nationally, 57% of private landlords are unwilling to let to tenants on UC
- Of these landlords:
 - 61% did not do so due to concerns about the financial risk

²² Kaehne, A., and Simcock, T. (2019). State of the PRS (Q1 2019) A survey of private landlords and the impact of welfare reforms. Edge Hill University Unit for Evaluation & Policy Analysis, commissioned by the Residential Landlords Association. Page 17.

²³ Department for Work & Pensions (2019). Guidance: Alternative Payment Arrangements. Department for Work & Pensions. Section 2.1.

²⁴ Section 8 of the Housing Act 1988

- 58% did not do so because they feared the claimant would enter arrears²⁵

These fears are hardly baseless: nationally, over half of private tenants on UC were in rent arrears between 2018 and 2019²⁶.

The letting agent we spoke to said that the vast majority of landlords they were involved with were of the same opinion. They said that the crucial concern for many landlords was the tenant would not be able to pay the rent. With plenty of other prospective tenants who are not claiming benefits and are more financially secure, the vast majority of applications from UC claimants are often rejected early in the application process because the landlord simply will not consider them. The agent said that financial issues amongst tenants on UC are so commonplace that it has put off local landlords to the extent that they are now averse to letting to claimants of any benefit at all, not just UC, and the few that they do let to are generally long-time tenants that have migrated on to UC or are still claiming legacy benefits.

Claimants themselves seem highly aware of this: the agent said that the first question they are often asked by prospective tenants is whether they take benefits claimants²⁷. This attitude amongst landlords is unsurprising given that most see themselves primarily as investors who are in letting to make money²⁸. The frequent default on claimant's first rent payment after making a claim for UC referenced previously is also very unhelpful for tenant-landlord relations, especially when the tenant has just moved in (which, given that a change of address is a change of circumstances that frequently prompts a UC claim, is a distinct possibility)²⁹.

We find this situation extremely concerning. Not only does it appear that considerable numbers of benefits claimants are being blocked from accessing housing in the Surrey Heath area, but there have been several civil cases brought against landlords on the basis that the practice is indirectly discriminatory and several tenants awarded

²⁵ Kaehne, A., and Simcock, T. (2019). State of the PRS (Q1 2019) A survey of private landlords and the impact of welfare reforms. Edge Hill University Unit for Evaluation & Policy Analysis, commissioned by the Residential Landlords Association. Pages 5 and 27.

²⁶ Kaehne, A., and Simcock, T. (2019). State of the PRS (Q1 2019) A survey of private landlords and the impact of welfare reforms. Edge Hill University Unit for Evaluation & Policy Analysis, commissioned by the Residential Landlords Association. Page 5.

²⁷ Interview with a local letting agent

²⁸ Ministry of Housing, Communities & Local Government (2019). English Private Landlord Survey 2018: main report. Ministry of Housing, Communities & Local Government. Pages 6, 18 and 19.

²⁹ Interview with SHBC

compensation³⁰. However, these cases have not set a legal precedent. CASH hopes that in future policymakers will look at this issue in more depth and lay down the rules more clearly, which will help all involved.

The local social housing perspective

The situation seems only marginally better for Surrey Heath's social housing sector and its tenants. The provider of more than 90% of Surrey Heath's social housing is Accent Peerless. Whilst Accent are only one housing association, their dominance of the local social housing stock makes their experience a good guide to Surrey Heath's social housing situation.

Surrey Heath-based Accent staff report that they have experienced many of the same issues with UC present in the local private sector, although as a large, national organisation, Accent are perhaps better able to deal with them than private landlords (who often don't have the same resources).

The difficulties faced by legacy benefit claimants moving to UC are a particular cause for concern for them. They say that it is essentially a given that migrating to UC will cause the claimant to fall into substantial arrears (usually four payments' worth, as Accent collect rent weekly), and the financial issues migrants experience essentially force Accent to accept this at the time and arrange gradual repayment later. As discussed previously, local Accent tenants moving to UC are discouraged from taking out an Advance Payment due to the high likelihood of the subsequent deductions causing even more underpayment of rent than accepting four weeks' worth of arrears.

MPTLs are also discouraged for several reasons. The administrative difficulties cited are that they are slow to set up, the monthly payment does not suit Accent's weekly rent collection dates, and four weeks' worth of payment is missed every year, generally in September. Furthermore, tenants who have to top up their rent due to limits on the LHA often mistakenly assume that because the payment is automatic it covers their full rent, and therefore end up routinely underpaying (*however, the recent changes to the LHA discussed previously may help to solve this problem in future*).

In many cases, Accent have tried to devise alternative solutions. Tenants are often encouraged to use direct debits set for the day after their UC is paid as a means of paying the rent as 'automatically' as possible and tenants claiming legacy benefits are often encouraged to build up as much credit on their account as possible in anticipation of having to move to UC in future. The fact that such workarounds are being used in

³⁰ Richardson, H. (2020). Legal victories over 'No DSS' letting agents. BBC News. Available at: <https://www.bbc.co.uk/news/education-51642316>

place of the tools provided by the DWP is quite concerning, although automatic deductions from UC payments are sometimes used as well.

Despite these measures and the below-market rent charged by Accent, their tenants on UC are still struggling to make ends meet. Of the 473 UC claimants Accent let to in the South (the vast majority being Surrey Heath residents), 55% are in arrears³¹. With this in mind, Accent's approach to evictions for rent arrears has become softer in the last few months and staff have become much more proactive in trying to assist tenants moving to UC. When staff engage with tenants struggling to pay the rent it often emerges that they are also having serious difficulties finding enough money for essential goods as well. Indeed, staff told us that eviction proceedings against tenants for arrears are now often simply thrown out, with judges having an increasing understanding of the desperate circumstances of some UC claimants³².

Advantages of legacy benefits

Housing is an area where the organisations we spoke to were much more positive about the legacy benefit system than about UC. Housing Benefit (HB) was paid directly to social housing providers by default and whilst direct payment to private landlords still required the claimant to have difficulties managing their money the guidelines gave local authorities significant scope to make decisions on a case-by-case basis when it was in the claimant's best interests³³. Both Accent and the local letting agent we spoke to said that under HB rent payment was much more consistent. Furthermore, RLA research shows that 62% of landlords letting to HB claimants are worried about their tenant falling behind with the rent if they move to UC and 66% worry that their tenant will struggle financially.

Section Four: Issues for claimants with complex needs

The final key impact of the introduction of UC in Surrey Heath has been to increase pressure on individuals that have chronic issues with being able to handle their own affairs. Throughout this report it has been very difficult to separate out the different issues that UC claimants experience. From Citizens Advice's own statistics we can see

³¹ Figures correct as of 14th February 2020

³² Interview with Accent

³³ Department for Work and Pensions (2014). Local Housing Allowance: Guidance Manual. Department for Work and Pensions. Pages 42-68.

that the clients who come to us about UC issues are often experiencing other problems too. Of our clients with a UC-related issue:

- 58% had at least one other issue related to benefits and tax credits
- 17% had at least one other issue relating to debt
- 18% had at least one other issue relating to employment³⁴

Issues with money management

Beyond this initial difficulty in breaking down the different aspects of claimant's financial difficulties, many individuals receiving UC have deep-seated issues with being able to organize and manage their affairs effectively. UC's aim to push claimants to manage their own money is laudable. However, CASH, the Hope Hub, SHBC and Accent – all organisations that offer ongoing support to UC claimants – report that many need significantly more ongoing support to develop their capacity to do so.

Medical assessments

As a result of Covid-19 lockdown, changes have also been made to the medical assessments regime for UC. New UC claimants with health issues and existing claimants who have already been allocated an assessment date will still have their medical assessments, but all other claimants due to be allocated a medical assessment slot will only have this assessment on 19th June earliest. The DWP has said that the assessments it is carrying out in the meantime will be done so remotely, using evidence on the claimant's application form, medical evidence and ideally a phone call.

This is concerning because in CASH's experience many claimants do not fill in their benefits application forms in the way that gives them the best chance of a higher award, with many accidentally understating their conditions because they are not familiar with the best terminology to use. This could result in many claimants unfairly awarded lower awards than they would have been had face-to-face assessments continued. To compound the problem, the consequences of this could be even more severe than in more normal times because individuals with pre-existing health conditions have the most stringent self-isolation guidance. In theory, this could mean that they and their families may have been more likely to have had to give up work and rely on benefits for the duration of this crisis. We will have to wait for further research to see whether there is any evidence to support this theory.

³⁴ Citizens Advice Surrey Heath statistics

Support with legacy benefits

It is important to note that the level of support for these individuals was lacking under the legacy benefit system too, but that the more frequent payment of many benefits and direct payment of HB being commonplace did mean that they did not have to wait as long for money if they ran out and that their housing situation tended to be more secure.

Section Five: Accessibility

It is essential for benefits to be accessible for everyone that might need them whilst keeping their administration as smooth as possible. Right from the start UC has been a primarily online system; claims by phone are allowed but are reserved for claimants that effectively cannot claim online. This contrasts with the legacy benefits system, which relied more on claims by phone and paper application forms. It is therefore important to assess whether claimants have had issues getting online and whether the system works effectively.

General levels of digital skills

Without digital skills and internet access the ability to apply to UC would be severely compromised. According to Ipsos MORI, levels of both internet access and digital skills are relatively strong in the South East, which is perhaps unsurprising given that the latter is correlated with both the former and with higher personal income (with the area being an affluent part of the UK)³⁵. However, it is important to note that across the country digital skills in 'Creating', which includes filling in online forms, are weaker than those in other areas³⁶.

UC claimant's digital skills

Nationally, UC claimants appear to have less access to the internet than average. As of 2018:

- 58% could regularly access the internet through a PC at home
- 31% had no PC but had regular internet access through their phone

³⁵ Ipsos MORI (2015). Basic Digital Skills: UK Report 2015. Ipsos MORI, for Go ON UK. Pages 19 and 39

³⁶ Ipsos MORI (2015). Basic Digital Skills: UK Report 2015. Ipsos MORI, for Go ON UK. Pages 5, 9 and 10

- 7% had no regular internet access at home but had regular access elsewhere (such as at the JobCentre, local library etc.)
- Only 4% of UC claimants did not have regular internet access of some kind – 2% had irregular access outside of their home and 2% had no access at all³⁷

Experiences with the online UC system

Overall, claimant's experiences with the online UC system seem to be mixed. According to independent research done for the DWP:

- 98% of UC claims are online
- 54% of claimants were able to submit a claim unassisted³⁸

However, there are issues:

- 25% of individuals attempting to apply for UC were unable to submit a claim online
 - This was generally due to issues with accessing and using computers and the internet
- 30% of those who did claim online found the process difficult
 - The online ID verification tool was a particular problem³⁹
- 21% of those who claimed online needed help to complete their application⁴⁰

It is also important to note that different levels of support were desired for different 'dimensions' of claims:

- 43% of claimants said they needed more support with initially completing their claims
- 30% said they needed more support with the ongoing management of claims⁴¹

³⁷ Adams, L., Foster, R., O'Driscoll, C., Svanaes, S., and Thomson, D. (2018). Universal Credit Full Service Survey. IFF Research Ltd., on behalf of the Department for Work & Pensions. Pages 28-29

³⁸ Ibid. Page 3

³⁹ Ibid. Page 36

⁴⁰ Ibid. Page 3

⁴¹ Ibid. Page 37-38

Groups with less access to the online UC system

Certain groups of claimants find claiming UC online to be more of an issue. Unsurprisingly, those without regular internet access report significant problems with both making and managing their claim⁴².

The position of older people and claimants with a long-term health condition is also a cause for concern. Both groups have below-average levels of access to the internet and use the internet less often than the average person⁴³. In addition, levels of the digital 'Creating' skills required in the initial application stage appear to drop off considerably amongst those aged 45 plus⁴⁴.

Difficulties experienced by claimants with long-term health conditions are particularly important given that around 41% of UC claimants are in this category⁴⁵. Approximately 35% of CASH clients have a long-term health condition or disability, so this is an important issue for us. Furthermore, housing association tenants are less likely to have 'basic digital skills' than the average person⁴⁶, and so may have more difficulty in making and managing their UC claim online. Nationally, 25% of UC claimants rent from their local council or a housing association, so it is important to address any issues holding these individuals back too.

As a result of the COVID-19 lockdown, JobCentres and public libraries have been closed to the public for the past few months. As we have seen, a sizeable minority of UC claimants rely on public access computers for internet access. Given that JobCentres and libraries are two of the primary locations providing these computers their closure could therefore have a severe impact on the ability of some claimants to access the UC system. It is important that all reasonable efforts are made to address this when possible.

⁴² Adams, L., Foster, R., O'Driscoll, C., Svanaes, S., and Thomson, D. (2018). Universal Credit Full Service Survey. IFF Research Ltd., on behalf of the Department for Work & Pensions. Page 17

⁴³ Office for National Statistics (2019). Statistical bulletin: Internet Users, UK: 2019. Office for National Statistics. Pages 7-8

⁴⁴ Ipsos MORI (2015). Basic Digital Skills: UK Report 2015. Ipsos MORI, for Go ON UK. Pages 12-13

⁴⁵ Adams, L., Foster, R., O'Driscoll, C., Svanaes, S., and Thomson, D. (2018). Universal Credit Full Service Survey. IFF Research Ltd., on behalf of the Department for Work & Pensions. Page 28

⁴⁶ Ipsos MORI (2015). Basic Digital Skills: UK Report 2015. Ipsos MORI, for Go ON UK. Page 27

Our experience

The problems with making an online application and the evidence from Citizens Advice across the country prompted the DWP to work with Citizens Advice to deliver a service to help people make their initial claim to UC, through to receiving the first payment. This is called the **'Help to Claim'** service. Advisers at CASH regularly assist clients with submitting UC applications online, with a lack of digital skill being a commonly cited reason for seeking CASH's help. However, in addition to needing support with making a claim a large proportion of client enquiries are around managing existing claims and resolving issues.

Case Study:



Shobal and his wife made a claim for Universal Credit following a change in their work situation. English was not their first language and they were not confident using IT. Because they did not understand that they needed to check and update their online journals on a regular basis, their Universal Credit claims continually lapsed. They were refused the option of a telephone claim as they had access to their child's laptop. Over a four-month period the couple visited Citizens Advice on 10 occasions for support managing their UC claim.

Conclusion

It is important to note that all of the organisations CASH spoke to for this report were supportive of the basic principle of UC. All agreed that the simplification of the legacy benefits system, encouraging claimants to work and promoting greater financial responsibility are laudable goals. Furthermore, the legacy benefits system was far from perfect.

Significant changes have already been made that have improved UC, with the DWP clearly taking on board input from Citizens Advice⁴⁷ and others. Furthermore, we hope that several of the recent changes made to UC during the COVID-19 lockdown stay in place once it is lifted, notably a more lenient stance on deductions and the minimum

⁴⁷ Hobson, F., Kearton, L., and Spoor, E. (2019). Managing Money on Universal Credit: How design and delivery of Universal credit affects how people manage their money. Citizens Advice. Pages 9-13

income floor, the higher standard allowance, and re-coupling of the LHA to 30th percentile rents.

However, UC clearly still has significant issues and has had a broadly negative impact on benefits claimants in Surrey Heath. This impact is particularly pronounced with regards to increased financial deprivation, particularly for workers that it is supposed to benefit. Furthermore, and perhaps most fundamentally, UC simply does not seem to be adequately designed for a clear sub-section of its claimants and as a result can risk them struggling more than under the legacy benefits system.

There are a number of core improvements that could be made to UC, but the three that we consider most vital are:

1. For those moving from legacy benefits to UC, we welcome the upcoming introduction of a two-week run-on for Job Seeker's Allowance, Employment and Support Allowance and Income Support in July 2020 as a major step in the right direction. However, we feel that a similar run-on for those on Tax Credits would cover the last major gap in legacy benefit provision over the UC waiting period. This would help claimants to avoid the 'debt trap' and subsequent financial issues caused by having to take out an Advance Payment, and allow them to budget as normal before their UC begins.
2. A more flexible approach should be taken towards claimants being able to establish different payment schedules and assessment periods in order to better reflect their work experience and make it easier for them to budget, and greater efforts should be made to increase awareness of existing options to modify payment schedules. The Scottish Choices scheme could offer a good guide to how this could work in practice, and suggests that this approach could be popular.
3. Claimants should be offered much more ongoing support with money management than they are currently receiving. UC's aim of encouraging financial responsibility is laudable but adapting to its payment schedule can be a challenge for claimants. The current situation is costly for both the individuals concerned and the state, and helping claimants to help themselves should result in increased financial resilience.

Even with our very local perspective we are confident that these changes could make a significant improvement to UC and the lives of individuals that claim it.

Appendix 1: Recent changes to UC as a result of COVID-19

As the main body of this report was being written the virus COVID-19 rapidly spread around the globe and swiftly forced countries everywhere to take unprecedented measures to combat it. This has included making various direct and indirect changes to the operation of UC to manage the huge increase in applications. These have been noted throughout the report in *italics*.

These changes affect claimant's payments, the conditions attached to their claims and the administration of claims. Some of these changes have been particularly positive for clients such as putting the onus on the DWP to contact clients about their initial claim rather than clients having to hold for sometimes over 90 minutes to speak to the right people. The rules on identity verification have also been relaxed due to the inability to meet with clients face to face. However, whilst this latter change has benefited clients there have been indications that these relaxed rules have resulted in increased fraudulent claims. It is unclear at this stage whether these changes will be temporary or whether they will continue once lockdown is lifted.

Appendix 2: Research Methodology

The research from this report is largely qualitative due to limits on the amount of data we have available. The majority of the material comes from interviews conducted with representatives from various local organisations and individuals with an interest in UC. Citizens Advice Surrey Heath has substantial experience in dealing with UC issues but is still fundamentally a generalist advice service, and the input from these interviewees has been invaluable in filling in the gaps in our knowledge. The organisations and individuals interviewed are as follows:

- Staff from the Housing and Revenue & Benefits teams within Surrey Heath Borough Council
- Frontline, a local charity offering in-depth support with people's finances, debts and benefits
- The HopeHub, a local charity offering ongoing casework focused on supporting the homeless and supporting people to find accommodation and live independent lives

- BESOM, the local food bank, which is supported by the majority of our local churches
- Staff from Accent, the provider of the majority of Surrey Heath's social housing
- A local letting agent, who wishes to remain anonymous

Various reports on dimensions of UC at the national level have also fed into this report. Finally, this report also contains analysis of Citizens Advice Surrey Heath's own figures on the clients we see experiencing UC issues and data from the national housing charity Shelter on the levels of financial support for renting on benefits.

Whilst hardly scientific, we hope that this report can bring together various perspectives on UC and though this provide a clearer picture of its impact on claimants in Surrey Heath.

Bibliography

Adams, L., Foster, R., O'Driscoll, C., Svanaes, S., and Thomson, D. (2018). Universal Credit Full Service Survey. IFF Research Ltd., on behalf of the Department for Work & Pensions.

Blenkinsopp, J., Bramley, G., Fitzpatrick, S., Littlewood, M., Sosenko, F., and Wood, J. (2019). State of Hunger: A study of poverty and food insecurity in the UK. The Trussell Trust.

Blount, T., Boutaud, C., Maher, C., and McClenaghan, M. (2019). Locked Out: How Britain Keeps People Homeless. The Bureau of Investigative Journalism. Available at: <https://www.thebureauinvestigates.com/stories/2019-10-04/locked-out-how-britain-keeps-people-homeless>

Citizens Advice (2019). Ensuring income security for all. Citizens Advice.

Department for Work & Pensions (2020). Guidance: Alternative Payment Arrangements. Department for Work & Pensions. Available at: <https://www.gov.uk/government/publications/universal-credit-alternative-payment-arrangements/alternative-payment-arrangements>

Department for Work & Pensions (2020). Stat-Xplore. Department for Work & Pensions. Available at: <https://stat-xplore.dwp.gov.uk/webapi/jsf/dataCatalogueExplorer.xhtml>

Department for Work & Pensions (2020). Universal Credit: Official Statistics. Department for Work & Pensions. Available at: <http://dwp->

stats.maps.arcgis.com/apps/MapSeries/index.html?appid=f90fb305d8da4eb3970812b3199cf489

Department for Work and Pensions (2012). Universal Credit Evaluation Framework. Department for Work and Pensions.

Department for Work and Pensions (2014). Local Housing Allowance: Guidance Manual. Department for Work and Pensions.

Hobson, F., Kearton, L., and Spoor, E. (2019). Managing Money on Universal Credit: How design and delivery of Universal credit affects how people manage their money. Citizens Advice.

Housing Act 1988. Section 8.

<https://www.fincap.org.uk/en/articles/schools>

Ipsos MORI (2015). Basic Digital Skills: UK Report 2015. Ipsos MORI, for Go ON UK.

Kaehne, A., and Simcock, T. (2019). State of the PRS (Q1 2019) A survey of private landlords and the impact of welfare reforms. Edge Hill University Unit for Evaluation & Policy Analysis, commissioned by the Residential Landlords Association.

Ministry of Housing, Communities & Local Government (2019). English Private Landlord Survey 2018: main report. Ministry of Housing, Communities & Local Government.

Richardson, H. (2020). Legal victories over 'No DSS' letting agents. BBC News. Available at: <https://www.bbc.co.uk/news/education-51642316>

Surrey County Council (2017). Interim Local Strategic Statement for Surrey 2016-2031. Surrey County Council.

Valuation Office Agency (2018). LHA 2018 tables. Valuation Office Agency. Available at: <https://www.gov.uk/government/publications/local-housing-allowance-lha-rates-applicable-from-april-2018-to-march-2019>

Valuation Office Agency (2019). LHA 2019-20 tables. Valuation Office Agency. Available at: <https://www.gov.uk/government/publications/local-housing-allowance-lha-rates-applicable-from-april-2019-to-march-2020>

Valuation Office Agency (2020). LHA 2020-21 tables. Valuation Office Agency. Available at: <https://www.gov.uk/government/publications/local-housing-allowance-lha-rates-applicable-from-april-2020-to-march-2021>

Office for National Statistics (2019). Statistical bulletin: Internet Users, UK: 2019. Office for National Statistics

Free, confidential advice. Whoever you are.

We help people overcome their problems and campaign on big issues when their voices need to be heard.

We value diversity, champion equality, and challenge discrimination and harassment.

We're here for everyone.



[Citizensadvice.surreyheath.org.uk](https://citizensadvice.surreyheath.org.uk)

Published June 2020

Registered charity number 1118181

Community Fund Grant Applications

Summary:

To consider grant applications to the Council's Community Fund Grant Scheme received by 30 June 2020.

Portfolio: Support and Safeguarding (Cllr Josephine Hawkins)

Date Signed Off: 23rd September 2020

Wards Affected: All

Recommendation

The Executive is asked to RESOLVE that £2,385 be awarded to St Mary's Church Centre to refurbish its main floor hall, subject to the conditions set out at Annex B of this report.

1. Key Issues

- 1.1 To qualify for a grant from the Community Fund, applications must meet the Council's objectives from its 5 Year Strategy and must demonstrate a benefit to the local community. All awards are made at the discretion of the Executive. Each of the applicants is a not for profit organisation. Each project recommended for a grant must be well planned with a sound financial basis.
- 1.2 Information on the Community Fund Grant scheme is provided on the Council's website and articles are regularly published in the Council's Heathscene magazine promoting recent successful awards.
- 1.3 All decisions on grant awards rest with the Executive. The Executive can also add conditions to the awarding of any grants as it sees fit.
- 1.4 The Community Fund Grant Scheme is attached at Annex C for information.

2. Resource Implications

- 2.1 The Council has its own Community Fund from which it provides grants of up to £25,000 to assist local 'not for profit organisations' with the delivery of community projects. Total project costs of up to £2,000 can attract 75% funding and total project costs over £2,001 can attract up to 50% funding from the scheme. The Community Fund held a reserve of £167,000 at 1 April 2020.

- 2.2 There are two submission deadlines each year, namely 30 June and the 31 December. This report includes the applications received by 30 June 2020.
- 2.3 One application has been received within the relevant period. The Portfolio Holder reviewed the application on 7 September 2020 and has supported the awarding of a grant to the organisation.
- 2.4 An analysis of the bid is included in Annex A. Details of the application are located in Annex B.
- 2.5 The total amount requested from the application is £2,385 and it is recommended that this sum is awarded. No payments are made until after evidence is submitted that the work is completed.

3. Options

- 3.1 The Executive has the option to:
- (i) Fund the organisations in line with the proposed amount in Annex B;
 - (ii) Fund the organisations to a greater or lesser amount of their requested sum;
 - (iii) Not fund the organisations.

4. Proposals

- 4.1 It is proposed that the Executive agrees the proposed awards set out in Annex B from the Community Fund Grant Scheme.

5. Corporate Objectives and Key Priorities

- 5.1 The funding of voluntary organisations allows the Council to meet its objectives to:
- Work in partnership with local organisations to provide support to the community and diverse open space and recreation facilities.
 - Understanding and supporting local voluntary groups.
 - Significantly contribute to civic pride through the provision of events and green spaces.
 - Work in partnership with the voluntary and third sector to extend opportunities in the Borough.
 - Encouraging greater involvement from local clubs and organisations including volunteering.

6. Equalities Impact

- 6.1 The Community Grant Fund has been equality impact assessed.

Annexes	Annex A – Summary of Bids Annex B – Proposed Grant Award Annex C - Community Fund Grant Criteria
Background Papers	Application Form
Author/Contact Details	Jayne Boitout - Community Partnership Officer jayne.boitout@surreyheath.gov.uk
Service Manager	Louise Livingston - Executive Head of Transformation

Summary of Bids

Applicant: St Mary's Church Centre

Project: To refurbish the main floor hall

Grant requested: £2,385

Project cost: £4,679

The facilities located in Park Road proves to be a popular choice for the 80 local organisations who chose to use the facilities regularly: these include: WI, Scottish dancing, pre-school, cooking classes, rock choir etc.

The hall was used as an outreach food hub during the Covid lockdown for the Watchetts area and many local families benefitted from this service.

The church hall is now starting to return to normal with opening the facilities to the community group patrons.

The works required will restore the floor and maintain it for future years.

St Marys Church have benefitted from a Covid-19 grant of £2,000 and the accounts ending 2019 show a £8,144 net increase on the previous year. However the impact of Covid-19 cannot be understated with the closure of the facilities for much of the year will have an impact upon on both income and reserves.

Recommendation and rationale: It is suggested that the Council supports an award in full of £2,385 in recognition of the broad community benefits that are hosted from the church hall.

Proposed Grant Awards

Applicant	Project Details	Project Cost £	Amount Sought £	Amount Proposed £	Suggested Conditions
St Mary's Church Centre	Refurbish the flooring to restore and maintain for future years.	4,679	2,385	2,385	SHBC to be acknowledged of the Community Fund Grant Award, and to introduce robust a maintenance programme
TOTAL		£4,679	£ 2,385	£2,385	

SURREY HEATH BOROUGH COUNCIL**COMMUNITY FUND GRANT SCHEME FOR GRANTS UP TO £25,000****About the scheme**

The Council has its own 'Community Fund' from which it provides grants of up to £25,000 to assist local not for profit organisations with the delivery of community projects.

To qualify for a grant from the Community Fund applications must fit with the Council's objectives from our 2020 Strategy (a copy of which is available from our website at the following link <http://www.surreyheath.gov.uk/council/councilinformation/corporateplan.htm>) and must demonstrate a benefit to the local community or a section of it.

Any non-profit making community/voluntary organisation serving all or part of Surrey Heath can apply for a community fund grant. Organisations not based in the Borough may also be eligible to apply for a grant where the project significantly benefits Surrey Heath residents.

Grants are available for amounts up to £25,000. The Council will pay up to 75% of a project that does not exceed £2,000 in total and will pay up to 50% of project costs for projects that cost between £2,001 and £25,000 in total.

The grant scheme is the Council's own. There is no legal requirement for the authority to have such a scheme in place; therefore all grants are awarded at the Council's discretion and there is no right of appeal if an application is refused.

No retrospective applications will be considered.

Grants will be considered for

- Equipment purchase
- One-off events
- Building projects
- Start-up costs

Grants will not be considered for

- General running costs
- Endowments
- Loan payments
- Activities promoting specific religious or political beliefs
- Salaries, wages, honoraria

Grants will not be made to

- Statutory Authorities or Schools/Colleges

- Trading/profit making companies
- Individuals or funds set up to benefit an individual

Assessment

In assessing the grant application, the Council will have regard to the amount of funding applicants have endeavoured to raise from other sources and will expect to see evidence of this.

In particular, there is a need to demonstrate a wider public benefit to the community over time with regard to the following:

- The existing funds/fundraising ability of the applicant;
- The sustainability of the project, for example the provision being made by the applicant for future repair and maintenance;
- The extent of support for the project in the local community;
- The extent to which the project recognises diverse needs and social inclusion.

Applications must be from properly constituted bodies/organisations that are not for profit groups.

Applications will be determined twice a year with deadlines for receipt being 30th June and 31st December. Applications received outside of these dates will not be considered until the next round. All grants will be determined by the Council's Executive Committee.

This page is intentionally left blank

Community Infrastructure Levy - Revised Approach Bidding for and Distribution of Funding Including Updating of the Regulation 123 List

Summary

As part of the work preparing for changes in how (Community Infrastructure Levy (CIL) is required to be reported it is proposed to amend the Regulation 123 list to identify a new list of Strategic Infrastructure Funding priorities and to revise the process for bidding for CIL funding for local projects and allocation of that funding in the non-parished wards through a new Local Community Improvement Fund.

Portfolio Finance

Date Portfolio Holder signed off report – 9 October 2020

Wards Affected

ALL

Recommendation

The Executive is advised to RESOLVE that

- (i) the revised approach to bidding for Community Infrastructure Levy funding to establish a Local Community Improvement Fund as set out in Appendix 1 for the non-parished areas be agreed;
- (ii) the revised approach to distribution of funding through pooling of the funds for the non-parished wards to create the Local Community Improvement Fund for those areas be agreed; and
- (iii) the revised Regulation 123 List as set out in Annex 2 to this report be agreed.

1. Resource Implications

- 1.1 Community Infrastructure Levy (CIL) includes a contribution toward the cost of administration of the scheme. As signalled in the report on CIL income for 2019/20 submitted to the Executive in June 2020 Covid 19 is impacting on income. To date the monies raised have covered the cost of administration, however income has dropped considerably in 2020/21 and is now being closely monitored.
- 1.2 Funding for projects must be covered by the available funds. Income has declined in 2020/21 as developers reduce rates of build, new projects are slow to come forward and developers seek to rephase payments by instalments as allowed for by recent government guidance. This income trend seems set to continue into 2021/22. There will therefore be less income available for projects in the short to medium term but development impacts will also be slower to arise.

2. Key Issues

CIL Funding

- 2.1 The CIL income received from each development is proportioned as follows.
- 5% - Administration
 - 15% -to local neighbourhood ward or Parish (25% where a Neighbourhood Plan is adopted)
 - Funding for SANG (Suitable Alternative Natural Greenspace), the amount is dependent on area and scheme type.
 - The balance of income is allocated to the Surrey Heath BC CIL Main Fund for spending on the strategic priorities, as set out in the Council's Regulation 123 List.
- 2.2 The 15% funding to parishes is paid direct to them as required by the CIL Regulations and they are under no obligation to share that money with other areas. The 15% CIL funding to non-parished areas is discretionary and was agreed by the Executive, this money could be pooled if so desired. This approach would benefit those wards where no development is occurring but the impacts of development are nonetheless being felt.
- 2.3 Bidding for funding is currently submitted by Councillors and there is little or no opportunity for Community Groups to submit bids directly.

The Regulation 123 List

- 2.4 The current Regulation 123 List was adopted by the Council in 2014 and apart from one minor change has not been reviewed since. The current project areas identified need updating to reflect changing Council priorities and needs of the Borough, particularly in the light of the emerging Local Plan.

3. Options

- 3.1 The options for the Executive are to :
- (i) Agree the recommendation
 - (ii) Not Agree the recommendation
- 3.2 The Executive is asked to agree the recommendation

4. Proposals

Distribution of CIL Funding

- 4.1 It is proposed that going forward funds for non-parished wards be pooled into a single fund for those areas. The priority will be given to funding projects in those non-parished experiencing development but with any unspent funding then being opened up to the other non-parished wards and to schemes where SHBC is only a part funder. It is

suggested that this fund should be opened up to bidding from Community Groups for capital projects as a Local Community Improvement Fund.

- 4.2 It is further suggested that the first bid round be opened on 1st December 2020, closing on 31st January 2021 to be reported to Executive in April 2021 providing no issues affected by purdah for local elections arise.
- 4.3 It is suggested that there are two bid rounds per financial year, to be publicised on the Council's website with a dedicated webpage. Groups will need to submit properly formulated bids, with clear financial information and accountability identified. A draft bid form is attached as Annex 1. Bids will be checked by officers before being submitted to Executive for consideration.

Regulation 123 List

- 4.4 The Regulation 123 List currently identifies the following areas for funding, this does not preclude other types of projects coming forward.
- 1) Shared Suitable Accessible Natural Greenspace (SANG) – Shared SANG includes SANG provided for development which cannot secure its own SANG solution.*
 - 2) Open Space (with the exception of Shared or On-Site SANG) which is not directly related to a development.*
 - 3) Local Transport Projects and Pedestrian Safety Improvements which are not directly related to a development.*
 - 4) Play Areas & Equipped Playing Space which are not directly related to a development.*
 - 5) Indoor Sports & Leisure Facilities which are not directly related to a development.*
 - 6) Community Facilities not directly related to a development.*
 - 7) Waste & Recycling not directly related to a development.*
 - 8) Strategic Transport Projects.*
- Flood Defence & Drainage Improvements which are not directly related to a development.*
- 4.5 Having reviewed the funding available and the projects being funded and in the light of the needs being identified by the emerging Local Plan. It is proposed that waste and recycling be removed from the list as no projects have been identified. That flooding also be removed as

this work is currently being funded by other grant funding from the Environment Agency or through the SANGs provision.

- 4.6 It is proposed that reference to transport be amended to local sustainable transport e.g. electric vehicles and that climate change and digital infrastructure projects be added to the list. The revised list is set out in Annex 2.

5. Corporate Objectives And Key Priorities

- 5.1 This project supports the objective to make Surrey Heath an even better place to live. It also supports prosperity in sustaining the local economy so that people can work and do business across Surrey Heath.

6. Policy Framework

- 6.1 The ability to set a CIL charge is set out in the Planning Act 2008 (as amended) and the Community Infrastructure Levy Regulations 2010 (as amended).

7. Legal Issues

- 7.1 The legislation requires that that 15% of CIL funds received are transferred to a Parish Council where development has occurred in that area, 25% where that Parish Council has a Neighbourhood Plan.

8. Governance Issues

- 8.1 The decision making for award of CIL funding will move from a CIL Governance Panel which no longer meets, to approval by Executive to provide a more transparent process.
- 8.2 Surrey Heath has agreed to create a ring fenced fund through allocation of £100,000 per year of CIL income for transfer to Surrey County Council as part of a programme to prioritise improvement of infrastructure in the Borough. This will be for projects or assets that are normally delivered through County Council resources. Such projects would be agreed on a case basis by the Executive.

Annexes	Annex1 Draft Community Improvement Fund bid form and guidance Annex 2 Proposed Regulation 123 List
Background Papers	None
Author/Contact Details	Jenny Rickard – Executive Head of Regulatory
Head Of Service	Jenny Rickard – Executive Head of Regulatory

Surrey Heath Borough Council

Local Community Improvement Fund 2020-2021

Project Application Form and Guidance

Guidance notes

What is CIL and how is it allocated

The Community Infrastructure Levy (CIL) allows the Council to raise funds from some forms of new development to help fund the infrastructure needed to mitigate the impacts of new development. CIL funds are used for either local infrastructure or infrastructure of wider strategic benefit to the borough. The Council has been collecting CIL since XXX 2014.

An initial 5% of CIL funds collected is retained by the council for administration purposes and 15% of the funds are allocated to parishes and wards for infrastructure projects which are required in the communities where development took place.

The funds for parished areas are paid to parish councils and bids can be made to them. For bids for funding in the non-parished areas priority will be given to funding projects in those non-parished experiencing development but with any unspent funding then being opened up to the other non-parished wards and to schemes where SHBC is only a part funder.

Strategic Priority Programme

The remaining CIL funds are allocated towards strategic borough-wide infrastructure, such as SANGs or highway schemes to support and enable growth. The strategic CIL funds are allocated through the Strategic Priority Programme (SPP). The SPP sets out the priority projects the council will fund through strategic CIL and identifies the amount of funding agreed via the Strategic CIL Working Group.

The Project Application form must be completed for each project that an infrastructure provider wishes to be considered for inclusion in the SPP.

What is not eligible for CIL funding

- Projects that have commenced prior to an application being submitted
- Ongoing revenue costs for a project
- Annual maintenance or repair
- Projects promoting a political party
- Projects that conflict with existing council policies
- VAT that you can recover

Payment of CIL funds if awarded

Successful projects must be able to commence within the twelve months following the award and acceptance of the terms and conditions. Where relevant, the CIL funding will be conditional upon the applicant obtaining any necessary building regulations and/or planning permission and any other consents or permissions as may be required.

Payment will be made after completion of the project and submission of verifiable invoices. In some cases the Borough Council make require checks to show the project has been satisfactorily completed. The original invoices/receipts need to be submitted to the council as proof of expenditure. You must have a bank account in the name of your organisation into which the council will pay the funding.

The CIL funding is a one-off payment and will not result in any future revenue commitment by the council. Any maintenance responsibility, revenue liability or ongoing future funding related to the application lies with the Applicant.

The assessment process is competitive and not all applications will be funded. There is no right of appeal against the decision.

Publicity

The applicant will need to agree to publicise the support of Surrey Heath Borough Council and the council reserves the right to use images of the project resulting from the award of the CIL funding as part of any publicity material that it may wish.

Completing the application form

The deadline for submission of completed applications to the Council for this funding round is midnight on XXXXXXXX.

To discuss a potential project or for further guidance, please contact
XXXXXXXXXXXXXX

Please submit the completed application form and supporting evidence via email to XXXXXXXXXXXX

2020-2021 Community Improvement Fund Project Application Form

Overview

Applications are invited for infrastructure projects to be considered for funding from the Community Improvement Fund.

To bid for funding, you will need to fill out the following application form and submit relevant supporting material, as necessary. This should include a letter of support from your Ward Councillor(s). Please ensure the information you provide is correct and complete to the best of your knowledge.

Deadline for applications

The deadline for submission of applications to XXXXX is **XXXXX**.

Please submit the completed application form and supporting evidence via email to XXXXXXXXX

Please Note

Failure to answer all the questions on this form could impact upon the consideration and success of your application.

Section A: Applicant Contact Information

Question	Answer
Organisation name	
Organisation address	
Name of main contact	
Position of main contact	
Phone number for main contact	
Email address for main contact	
Type of organisation (If a charity, please provide registration number)	
Is the organisation able to reclaim VAT?	

Section B: Project Overview and Strategic Case

Question	Answer
1) Project Title	
2) Summary of the project proposal	
3) Full address of project location	

4) Project partner/s (if applicable)	
5) How will the proposed project help address the pressures caused by development in the borough?	
6) What problem is the project addressing, and what are the expected outcomes?	
7) Please provide details of any supporting council policy, strategy, programme, action plan, etc.	
8) Why is strategic CIL funding being sought? What other sources of funding have been considered and applied for? Please specify which elements of the project, the funding secured is required to deliver.	
9) Is there a related revenue spend associated with the project once it is complete, and if so, how will this be addressed?	
10) Please set out the detailed breakdown of the estimated project cost and provide supporting costing documentation (e.g. planned spend profile, project cost estimates, supporting quotes, procurement policy).	
11) Please set out the proposed project delivery plan, including key tasks and milestones (this can be appended to	

<p>your application). Please include plans and maps where relevant.</p>	
<p>12) Please specify whether planning permission is required, and if it has already been secured (stating reference number).</p>	
<p>13) Is there any additional information that may support the application? Remember to include a letter of support from your ward councillor(s).</p>	

Section C: Financial Summary

Please show in the table below the amount of CIL funding being sought and any other contributions that may have been allocated for this scheme.

Funding Source	Amount	Detail
CIL funding sought		
Infrastructure provider contribution		
Third party contribution		
Total cost of project		

When you have completed the application, please read and sign the declaration below and submit the application form as directed.

Declaration

To the best of my knowledge the information I have provided on this application form is correct.

If Surrey Heath Borough Council agrees to release funds for the specified project, these funds will be used exclusively for the purposes described. In such an event, I agree to inform the Council's CIL officer of any material changes to the proposals set out above. When requested, I agree to provide the council with all necessary information required for the purposes of reporting on the progress or otherwise of the identified project. I recognise the council's statutory rights as the designated CIL Charging Authority, which includes provisions to reclaim unspent or misappropriated funds.

Privacy Notice: By signing this form, the applicant agrees to Surrey Heath Borough Council checking all supplied information for the purposes of informing decision making. The information on this form will be stored by the Council for the sole purpose of fund processing, analysis and accounting. Information about the project may be publicised on the council website and in public material for publicity purposes. Personal data will not be disclosed without any prior agreement of those concerned, unless required by law. For further information on the council's privacy policy, please see: XXXXXXXXXXXX

All organisations involved with the application will need to sign and date the form.

Applicant organisation signature

Signed: _____

Organisation: _____

Date: _____

Supporting organisation signature (if applicable)

Signed: _____

Organisation: _____

Date: _____

Surrey Heath Borough Council Community Infrastructure Levy: Regulation 123 List

The following list of infrastructure projects may be funded or part funded through the Community Infrastructure Levy (unless otherwise stated).

- 1) Shared Suitable Accessible Natural Greenspace (SANG) –
Shared SANG includes SANG provided for development which cannot secure its own SANG solution. 1
- 2) Open Space (with the exception of Shared or On-Site SANG) which is not directly related to a development. 2
- 3) Sustainable Local Transport Projects and Pedestrian Safety Improvements which are not directly related to a development. 2
- 4) Play Areas & Equipped Playing Space which are not directly related to a development. 2
- 5) Indoor Sports & Leisure Facilities which are not directly related to a development. 2
- 6) Community Facilities not directly related to a development. 2
- 7) Sustainable Strategic Transport Projects. 2
- 8) Climate change projects 2
- 9) Digital Infrastructure Projects 2

1 Development sites which cannot provide their own SANG solution will contribute to shared SANG solutions by way of a CIL payment. Development which is required to provide its own bespoke SANG solution will continue to be secured by S106 obligations in line with CIL Regulations 122 & 123. Nothing in this footnote overrides the Borough Council's obligations as the competent authority for the purposes of its duties under the Conservation of Habitats & Species Regulations (2017) as amended.

2 Provision, improvement, replacement, operation or maintenance to reduce the incremental impact of development on off-site infrastructure which is not provided or required as avoidance/mitigation on or near individual development sites. This Regulation 123 List excludes projects for infrastructure which are directly related to an individual site i.e. on or near site infrastructure to avoid/mitigate impact arising from that site. The Borough Council may apply CIL, continue to seek S106 obligations, or a mix of S106 and CIL, toward on or near site infrastructure in line with the Infrastructure Delivery SPD and in accordance with Regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010 (as amended).

NOTE: To enable delivery of new residential units that are not CIL liable but nonetheless include a net increase in residential units the Council will require

such development to contribute toward the cost of the ongoing management and maintenance of SANG through a Unilateral Undertaking. This is to meet the requirements of the Conservation of Habitats and Species Regulations 2017, (or as subsequently amended). The Council will levy a contribution of £112.50 per square metre for the residential floorspace created. This is the management and maintenance cost of SANG.

The types of development affected include: Change of use to Residential use through the Prior Approval process under the General Permitted Development Order 2015 (or as subsequently amended); Self / custom build homes; Affordable Housing and Starter Homes as defined in the National Planning Policy Framework (NPPF); Applications where less than 100sqm residential floor space is created; Conversions to residential use from other use classes (as set out in the Town and Country Planning Use Classes Order), through planning permission, where not CIL liable; Conversions to a C2 use where the development may be considered to give rise to likely significant effect to the SPA.

For residential conversions within use class C3 (Residential) and C4 (Houses of Multiple Occupation), where no additional floorspace is created but the overall number of units increases, avoidance measures must also be provided through the allocation of SANG, with contributions charged as set out in paragraphs 6.7-6.10 of the Thames Basin Heaths Special Protection Area Avoidance Measures Supplementary Planning Document (2019).

The development types above may not form an exhaustive list of residential developments providing net additional units that are not CIL liable. The Council will seek appropriate SANGs contributions for any other residential development types that are not CIL liable but are required to provide avoidance measures for their impact on the Thames Basin Heaths Special Protection Area.

Surrey Heath Statement of Community Involvement

Summary

This report seeks adoption of the Surrey Heath Statement of Community Involvement (SCI) following consultation.

The SCI sets out how the Council will involve the community and stakeholders in the preparation of the Surrey Heath Local Plan and in the determination of planning applications. Consultation on the SCI took place in November-December 2019. A further targeted consultation took place in June-July 2020 to take account of subsequent changes to the document that were made to reflect social distancing measures in response to Covid-19. This report outlines the proposed changes resulting from both consultations.

Portfolio: Planning and People

Date Portfolio Holder signed off report: 18 September 2020

Wards Affected

All

Recommendation

The Executive is advised to RESOLVE that the Council's Statement of Community Involvement (SCI), as set out at Annex 1 to this report, be adopted.

1. Resource Implications

- 1.1 There are no resource implications beyond that provided for within the agreed budget for 2020/21.

2. Key Issues

- 2.1 It is a legal requirement for the Council to have an up to date Statement of Community Involvement and to make it available on the website for the public to access.
- 2.2 The current SCI was adopted in 2017. In view of the progression of the Local Plan, it is appropriate to ensure that it is robust and up to date. This is particularly relevant, as at independent Examination of the Local Plan, the Inspector will consider whether the Council has carried out consultation in accordance with the approach set out in the SCI.
- 2.3 The SCI sets out:
- The statutory background;
 - The purposes of Community Involvement;
 - Requirements and potential methods of public involvement in the preparation of the Local Plan and associated documents;

- Support for neighbourhood plans;
 - The process for consultation on planning applications.
- 2.4 In September 2019, the Executive agreed to a six-week consultation on the Draft SCI. The consultation took place in November and December 2019.
- 2.5 Following consultation there have been a number of minor changes to the SCI, as follows:
- Page 6, paragraph 1.8 – Add further bullet point: *“Members of the public who do not have access to, or the means to use the Internet.”*
 - Page 9, Table 2 – Amend Table 2 column 2 row 1 to include the following statement: *“Make Local Plan documentation available to view as part of the consultation.”*
 - Page 22, Annex 1 – Add a footnote reference to The Town and Country Planning (Local Planning) (England) Regulations 2012 for Specific Consultation Bodies and General Consultation Bodies.
 - Page 23, Annex 1 – Amend title of Local Equality Groups Table to *“Local Equality Groups in Surrey Heath”*.
 - Page 23, Annex 1 – Amend Local Equality Groups Table to include a section for Gypsy and Traveller Groups. Include within this section the Surrey Gypsy and Traveller Communities Forum.
 - Page 25, Annex 3 – Add definition for Large Scale Major Development to Glossary of Terms for Community Involvement.
 - Page 27, Annex 3 – Add definition for Small Scale Major Development to Glossary of Terms for Community Involvement.
- 2.6 The Local Plan Working Group considered the revised SCI including post consultation amendments at the 10 February 2020 meeting and had no further suggested changes to make.
- 2.7 A further targeted consultation was undertaken in June and July 2020 on additional minor changes to the Statement of Community Involvement that were made in response to the Covid-19 pandemic and social distancing measures.
- 2.8 Following the further targeted consultation a few additional minor changes to the SCI were made, as follows:
- Front cover – Amend title of document to say, “Statement of Community Involvement (SCI) Revised Version including amendments in response to Covid-19 **or similar health or security challenges that may arise**”
 - Page 6, paragraph 1.11 – Amend first sentence as follows: “As the SCI had not yet been adopted the Council took the opportunity to review the SCI in the light of Covid-19 restrictions, **also having regard to the possibility of similar health or security challenges that may arise.**”

- Page 7, paragraph 1.14 – Amend last sentence as follows:
“Where social distancing measures and other restrictions relating to Covid-19 are no longer in place, the methods of consultation applied through this SCI will revert to the general requirements in this document, without the need to comply with any additional legislation associated with Covid-19, or similar health or security challenges.”
- Page 9, Table 1, column 4, row 4 – Add footnote 6 reference to state ***“Where it is deemed possible to do so whilst complying with government guidance and any relevant legislation for social distancing requirements in place at the time of publication.”***
- Page 10, Table 2, column 2, row 2 – Amend footnote 7 to say, “Workshops to be held subject to being able to adhere to Covid-19 legislation and guidance including on social distancing, ***or any future legislation and guidance issued for similar health or security challenges that may arise.***”
- Page 11, Table 2, column 2, row 3 – Amend last sentence of footnote 9 to say, “If it cannot be complied with due to government legislation and guidance on Covid-19 and social distancing measures ***or any future legislation and guidance issued for similar health or security challenges that may arise***, the Local Plan process will be delayed until the requirement to make documents available can be met.”
- Page 13, Table 3, column 2, row 2 – Amend footnote 13 to say, “If it cannot be complied with due to government legislation and guidance on Covid-19 and social distancing measures ***or any future legislation and guidance issued for similar health or security challenges that may arise***, the consultation process will be delayed until this requirement to make documents available can be met.”
- Page 20, paragraph 5.1 – Amend fourth sentence as follows:
“Where the process of consulting on and determining planning applications is affected by legislation and guidance relating to Covid-19 ***or similar health or security challenges that may arise***, the Council will ensure that those requirements are met which may result in some minor amendments to the process and procedures set out below.”
- Page 23, Table 6, title – Amend footnote 23 to say, “Subject to complying with legislation and guidance relating to Covid-19 ***or any future legislation and guidance issued for similar health or security challenges that may arise.***”

2.9 The SCI has also been updated to reflect the temporary Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, that are in force until 31st December 2020. This enables consultations on Local Development Documents to continue without having to comply with the requirement to make hard copies of documentation available for inspection, so long as they are available on the Council’s website.

3. Options

3.1 The options for the Executive to consider are:-

- (i) To **AGREE** to adopt the updated Statement of Community Involvement.
- (ii) To **NOT AGREE** to adopt the updated Statement of Community Involvement.

4. Proposals

4.1 It is proposed the Executive adopts the Statement of Community Involvement. This is to ensure compliance with the Planning and Compulsory Purchase Act 2004 (as amended).

5. Corporate Objectives And Key Priorities

5.1 The SCI supports the objective for Place and People through engagement with local communities on planning matters.

6. Policy Framework

6.1 The SCI, on adoption, will support the preparation of the Local Plan and associated documents and the Development Management process and will therefore have implications for future local community engagement.

7. Legal Issues

7.1 It is a legal requirement for the Council to prepare an SCI.

8. Consultation

8.1 The draft SCI was subject to public consultation in accordance with Regulation 26 of the Town and Country Planning Regulations (Local Development) (England) 2004 (as amended) following agreement by the Executive. The consultation ran from Tuesday 5th November until Tuesday 17th December 2019. A Statement of Consultation has been prepared is attached at Annex 2 of this report.

8.2 A further targeted consultation was undertaken in June and July 2020 on additional minor changes to the Statement of Community Involvement that were made in response to the Covid-19 pandemic and social distancing measures. A Statement of Consultation for the further consultation has been prepared is attached at Annex 3 of this report.

Annexes	Annex 1: Revised Surrey Heath Statement of Community Involvement Annex 2: Statement of Consultation for the SCI Annex 3: Statement of Consultation for the SCI version with amendments in response to Covid-19 or similar health or security challenges that may arise
Background Papers	None
Author/Contact Details	Chris Kirk – Senior Planning Officer christopher.kirk@surreyheath.gov.uk
Head of Service	Jenny Rickard – Executive Head of Regulatory

This page is intentionally left blank

SURREY HEATH BOROUGH COUNCIL

LOCAL PLAN



Statement of Community Involvement (SCI)

September 2020

**Revised Version including amendments in
response to Covid-19 or similar health or security
challenges that may arise**



Great Place • Great Community • Great Future

Foreword

This Statement of Community Involvement (SCI) sets out how the Council will involve the community and stakeholders in the preparation of the Surrey Heath Local Plan and in planning applications.

By getting involved in planning documents and proposals at the early stages, residents, businesses and other stakeholders will have the opportunity to have a better say in shaping their local area.

The Council has a legal requirement to prepare an SCI and has had regard to national planning policy and legislation in preparing this revised version. This SCI is an updated version of the SCI previously adopted by the Council in 2017.

The SCI has been updated to ensure that it reflects the most up to date national planning policy and legislation. One of the main changes is the inclusion of the neighbourhood plan process and details of the support that the Council can provide to those communities preparing neighbourhood plans.

Should you have any queries regarding this document including whether you would like a copy in large print, Braille or another language, please contact the Council on 01276 707100 or alternatively e-mail planning.policy@surreyheath.gov.uk

Printed and Published by:
Planning Policy and Conservation
Surrey Heath Borough Council
Surrey Heath House
Knoll Road
Camberley
GU15 3HD

Contents

Section	Title	Page No
1	Introduction	4
	What is a Statement of Community Involvement	4
	Duty to Involve	5
	Duty to Co-Operate	5
	Purposes and Benefits of Community Involvement	5
	Who will be involved	6
	Under- represented Groups	6
	Impact of Covid-19 on Planning Consultations	6
2	Links with other Plans and Strategies	7
	Surrey Heath Five Year Strategy	7
	Links with Other Documents	8
3	The Local Plan	8
	The Local Plan	8
	Table 1 Local Development Documents	9
	Table 2 Local Plan Documents	10
	Table 3 Supplementary Planning Documents	13
	Table 4 Public Consultation procedures and Methods for Background Documents supporting the Local Plan	15
	How will Comments and Responses on the Local Plan be dealt with?	17
4	Neighbourhood Plans	17
	Table 5 Steps in preparing a Neighbourhood Plan	18
5	Planning Applications	20
	Minor Developments	20
	Small scale Major Developments	20
	Large scale Major Developments	20
	Deciding Applications	21
	Surrey County Council Planning Applications	22
	Community Involvement at the Pre- Application Stage	22
	What the Council cannot do	23
	Table 6 Suggested measures for applicants to involve the public at the pre – application stage	23
	APPENDICES	25
1	Consultation Bodies for a Local Plan	26
2	Summary Neighbourhood Plan Process	28
3	Glossary of Terms for Community Involvement	29

1 Introduction

What is a Statement of Community Involvement?

- 1.1 Surrey Heath Borough Council as a Local Planning Authority is legally required¹ to produce a Statement of Community Involvement (SCI) and make it available on the website for the public to access. The SCI sets out how the Council will involve the community in the preparation of the Surrey Heath Local Plan and in the determination of planning applications. It also sets out the support that the Borough Council will provide to local communities in the preparation of neighbourhood plans.
- 1.2 In producing the SCI, the Council is setting out how it will promote effective public participation in the planning system. This will ensure that all sections of the community (local residents, businesses, landowners, interest groups, organisations) and stakeholders (national and regional organisations) have an opportunity to be actively involved at an early stage of the planning process. This involvement will continue through the preparation and revision of Local Plan documents and in significant development management decisions.

National Planning Policy and Legislation

- 1.3 In preparing the SCI, and in preparing planning documents and making planning decisions, the Council must have regard to national policy and legislation. These include:

The **National Planning Policy Framework** (NPPF), 2019

The key aims of national planning policy are to:

- Make sure a local plan, produced by communities, is the cornerstone of the planning system;
- Make planning more accessible for everyone;
- Raise design standards;
- Protect the natural and historic environment;
- Create a presumption in favour of sustainable development;
- Ensure that planning is as simple and as quick as possible, meaning that approval processes are simplified and thus supporting economic growth.

The **Localism Act**, 2011

The Act brought in the following:

- Community right to challenge – allowing local community groups the chance to procure important local services and deliver them for the borough;
- Neighbourhood Planning - allowing local communities to prepare plans to guide the planning of their local areas;
- Community right to bid – allowing local groups the opportunity to bid for buildings that the local authority has placed on a list of community assets;
- Abolition of Regional Strategies;
- Duty to co-operate – local authorities must work together, and with other prescribed bodies to co-operate on planning issues to provide outcomes.

¹ Section 18 of the Planning and Compulsory Purchase Act 2004 (as amended).

The ***Duty to Involve***²

Imposes a duty on all local authorities to involve local representatives when carrying out "any of its functions" by providing information, consulting or "involving in another way". The duty is wide ranging and applies to the delivery of services, policy, and decision making.

The ***Duty to Co-Operate***³

Imposes a duty on a local authority to co-operate with specific bodies in relation to planning of sustainable development and strategic matters. A 'strategic matter' is defined as:

- a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and
- b) sustainable development or use of land in a two-tier area if the development or use
 - i. is a county matter,
 - ii. has or would have a significant impact on a county matter.

- 1.4 The duty to co-operate bodies and other key stakeholders and community groups to be consulted are set out in Appendix 1 of this document.

Purposes and Benefits of Community Involvement

- 1.5 Community involvement should be a continuous process which enables the local community to say what sort of place it wants to live in, at a stage when this can make a difference. The benefits of involving a wide range of people and organisations throughout the planning process include:
- Increased focus on the priorities identified by the local community;
 - Increased understanding of the process;
 - Consensus and ownership of the process;
 - Influencing site specific proposals.
- 1.6 In coming to a view as to what should be included in the SCI, the Council has had regard to certain principles. The principles underpinning community involvement in planning are as follows:
- Arrangements should be built on an understanding of local needs and be fit for the purpose;
 - The community and stakeholders should be involved as early as possible to provide people with a chance to discuss issues and options and the potential to make a difference;
 - Use of methods which encourage engagement and are relevant;
 - Providing feedback on decisions and an opportunity to see how ideas have developed through the process;

² Imposed by Section 138 of the Local Government and Public Involvement in Health Act 2007

³ Imposed by Section 33A of the Planning and Compulsory Purchase Act 2004

- Clear processes and rules on engagement so that people understand when they can participate and the rules for doing so;
- Building community involvement into the process from the start and links to other community involvement processes.

Who will be involved

- 1.7 The legal requirements for community involvement and public participation are set out in the Town and Country Planning (Local Development) (England) Regulations 2012⁴. The Borough Council will meet the legal requirements for involving the community in the preparation of the Local Plan and in determining planning applications. Further detail in relation to community involvement and public participation are set out in the relevant sections below.

Under Represented Groups

- 1.8 Under-represented groups are those that are traditionally under-represented in formal consultation. In Surrey Heath the following groups are considered particularly hard to reach:
- Black and Minority Ethnic (BME) Groups including Gypsies and Travellers
 - Disabled People
 - Young people
 - Older People
 - Lesbian, Gay, Bi-Sexual and Transgender (LGBT) groups
 - Low income groups
 - Members of the public who do not have access to, or the means to use the Internet
- 1.9 The Council will work with these groups to see how to best involve them in the Local Plan consultation process.

Impact of Covid-19 on Planning consultations

- 1.10 The Council consulted on changes to the SCI in November 2019. Following consideration of the responses received, a revised SCI was due to be considered by the Councils Executive in March 2020. However, in response to the Covid-19 pandemic, the Government issued Regulations and guidance restricting social contact. The measures introduced by the Government have an impact on how stakeholder engagement and consultation on the Local Plan, on Supplementary Planning Documents (SPDs) and planning applications can be carried out. Local Authorities were advised to review their SCI's to ensure that they reflected social distancing measures.
- 1.11 As the SCI had not yet been adopted the Council took the opportunity to review the SCI in the light of Covid-19 restrictions, also having regard to the possibility of similar health or security challenges that may arise. The Council consulted on changes to the SCI which largely relate to the difficulties of making hard copies of documents available for viewing and to the ability to hold face to face meetings or workshops. Following

⁴ The Town and Country Planning (Local Development) (England) Regulations 2012: <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

consideration of the responses received to the additional consultation, this revised SCI has been produced.

- 1.12 On 16th July 2020 The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020⁵ changed the requirement for councils to make copies of Local Development Documents available for inspection at their principle office as set out in Reg 35 of The Town and Country Planning (Local Planning) (England) Regulations 2012. From 16th July 2020 until 31st December 2020, plan-making authorities can comply with Reg 35 by making Local Development Documents available on the council's website. The Environmental Assessment of Plans and Programmes (Coronavirus) (Amendment) Regulations 2020 also change the requirement for inspection of relevant documents including the Sustainability Appraisal and Strategic Environmental Assessment (SA SEA) over the same temporary period.
- 1.13 In the instance that the Coronavirus Amendment Regulations are extended, the Council will continue to comply with them by making Local Development Documents and SA SEA documents available on the council's website. Following the end date of the Coronavirus Amendment Regulations, the Council will adhere to any other government legislation and guidance on issues such as social distancing in preparing the Local Plan, SPDs and dealing with planning applications. This may result in the need for engagement measures set out in the SCI to be carried out in a different way, for example through online webinars or video conferencing. It may also impact on the ability to make copies of documents available at locations across the Borough. Where hard copies of documents are required to be made available by Regulations, for example during consultation on the Pre - Submission Local Plan at Regulation 19, this may require an amendment to the Local Plan (or SPD) timetable until such time as the Regulations can be met.
- 1.14 If restrictive measures are in place during periods of consultation, the Borough Council will look for innovative ways to ensure that as many residents and stakeholders as possible have the opportunity to take part whilst ensuring that we adhere to Government guidance. Where social distancing measures and other restrictions relating to Covid-19 are no longer in place, the methods of consultation applied through this SCI will revert to the general requirements in this document, without the need to comply with any additional legislation associated with Covid-19, or similar health or security challenges.

2 Links with other Plans and Strategies

Surrey Heath Five Year Strategy

- 2.1 The Surrey Heath Five Year Strategy sets out the vision, corporate objectives and key priorities of the Borough Council. The Local Plan has particular relevance to the following corporate objectives:
- Making Surrey Heath an even better place where people are happy to live
 - Sustaining and promoting our local economy so that our people can work and do business across Surrey Heath
 - Building and encouraging communities where people can live happily and healthily

⁵ The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020: <https://www.legislation.gov.uk/uksi/2020/731/made>

Links with other documents

- 2.2 Wherever possible regard will also be had to other documents which reflect the aspirations of local communities. Such documents could include Neighbourhood Plans, Parish Plans and Village Design Statements. These documents help to build links within the community, strengthen the evidence base and gather opinion. The factual information, views, opinions and priorities for action that these documents provide can inform the development plan process. Community led plans are an inclusive approach to planning at a local level and require minimal officer support.

3 The Local Plan

The Local Plan

- 3.1 Local Planning Authorities are required to produce a Local Plan. Local Plans set out the long term planning policies for an area against which planning applications are determined. Surrey Heath's 'Local Plan' currently consists of the Core Strategy and Development Management Policies Document (2012), the Camberley Town Centre Area Action Plan (AAP) (2014) and saved policies in the Local Plan 2000. In addition, the Windlesham Neighbourhood Plan has been "made" and therefore forms part of the Development Plan, against which planning applications are determined. Work on a new Local Plan has commenced and consultation on an Issues and Options/Preferred Options document took place in 2018.
- 3.2 The legal requirements for community involvement and public participation for the Local Plan are set out in the Town and Country Planning (Local Development) (England) Regulations 2012. Community involvement will be inclusive seeking to reach either all of those most affected or an appropriately chosen representative group. The organisations that the Council must consult comprise 'specific' and 'general' consultation bodies. These include statutory consultees, key stakeholders and general community groups and are listed in Appendix 1. The Council also retains a list of those groups/individuals which the Borough Council will also seek to involve in the Local Plan process as appropriate to their interests.
- 3.3 Tables 1 – 4 set out the stages at which community involvement will occur, who will be consulted, when it will occur and how organisations and individuals will be involved. With the growth in digital technology, the Council will explore how this can best be used to engage with the local community in planning consultations. Paragraphs 3.4 – 3.6 below explain how representations will be considered in the process.

Table 1 Procedures and Methods for Public Involvement in Local Development Documents that are not a Local Plan/SPD

Document	Consultation & Notification What we will do	When will you be involved?	How will you be involved?
Local Development Scheme (LDS)	There is no legal requirement for consultation or notification.		The LDS will be monitored on an annual basis and reviewed as required. The Council will accept representations seeking changes to the LDS at any time. These will be considered at the time of the LDS review.
Statement of Community Involvement (SCI)	There is no legal requirement for consultation or notification, however the Council will consult on revised versions of the SCI prior to adoption.	Consultation on draft revised versions of the SCI.	The SCI will be monitored on an annual basis and subject to review as deemed appropriate by the Local Authority. All statutory consultees and identified stakeholders will be consulted in writing, e-mail and other forms of communication on draft revised versions of the SCI.
Authority Monitoring Report (AMR)	The AMR will be produced on an annual basis (typically December). Following the enactment of the Localism Act 2011, the provision to consult the Secretary of State has been repealed.		The AMR will be reviewed annually. The AMR will be published on the Council website and copies made available for inspection at local libraries ⁶ and for purchase on request.

⁶ Where it is deemed possible to do so whilst complying with government guidance and any relevant legislation for social distancing requirements in place at the time of publication.

Table 2 Procedures and Methods for Public Involvement in Local Plans

Activity	Involvement & Notification What we will do	When will you be involved?	How will you be involved?
Issues and Options Stage/ Pre-Submission Stage Consultation (Regulation 18)	<p>Notify specific and general consultation bodies as the local planning authority consider appropriate. Make Local Plan documentation available to view as part of the consultation.</p> <p>Dependent upon the subject matter of the Local Plan, the Local Planning Authority may employ further engagement techniques as deemed appropriate e.g.</p> <ul style="list-style-type: none"> • Workshops for key stakeholders⁷ • Presentations to parish councils, to be held either virtually or face to face, in accordance with government guidance in relation to social distancing measures at the time the event takes place • Major articles in Council's Heathscene magazine to all households • Issue press release(s) 	<p>Specific and general consultation bodies will be notified of the consultation period prior to the publication of the document.</p> <p>The consultation will run for a period not less than 6 weeks.</p>	<p>Documentation to be published on the website and where possible, adhering to government legislation and guidance on issues such as social distancing, at the Council's principle office, local libraries and parish council offices⁸. The Council will also use social media as a means of communication.</p> <p>Dependent upon the subject matter of the Local Plan, the Local Planning Authority may employ further engagement techniques as deemed appropriate.</p>
Publication of a local plan (Regulation 19)	Make Submission Documents and statement of the representations procedure available for inspection in	Specific and general consultation bodies will be notified of the	Documentation to be published on the website and where possible, adhering to government legislation and

⁷ Workshops to be held subject to being able to adhere to Covid-19 legislation and guidance including on social distancing, or any future legislation and guidance issued for similar health or security challenges that may arise.

⁸ Following the end date of the temporary Coronavirus Amendment Regulations, where it is deemed possible to make documents available for inspection whilst complying with government guidance and any relevant legislation for social distancing requirements that is in place at the time of the documents' publication.

Activity	Involvement & Notification What we will do	When will you be involved?	How will you be involved?
and Representations relating to a local plan (Regulation 20)	<p>accordance with Regulation 35⁹ (see appendix 1) and send to statutory consultation bodies.</p> <p>Send to general consultation bodies invited to make representations under Regulation 18:</p> <p>A statement of the representations procedure; A statement of the fact that the Submission Documents are available for inspection and of the places and times at which they can be inspected¹⁰.</p>	<p>consultation period prior to the publication of the document.</p> <p>The consultation will run for a period not less than 6 weeks.</p>	<p>guidance on issues such as social distancing, at the Council's principle office, local libraries and parish council offices (subject to footnote 9).</p> <p>Any person may make representations about a local plan which the local planning authority proposes to submit.</p>
Independent Examination (Regulation 24)	<p>At least 6 weeks before the examination starts, the Council will</p> <ul style="list-style-type: none"> • Publish details on website • Notify people who made representations of the date the examination starts and name of person appointed to hold examination 	<p>All those who have submitted a representation will be notified of the dates and times of:</p> <ul style="list-style-type: none"> - a Pre-Examination Hearing if considered necessary by the Inspector; and - the EiP. 	<p>All those who have submitted a representation will be invited to attend both the Pre-Examination Hearing (if held) and the EiP. An Independent Programme Officer appointed to oversee the Examination process will advise these individuals / organisations of the timetable on behalf of the Planning Inspector. Those that have previously stated their intent to provide oral evidence at</p>

⁹ Following the end date of the temporary Coronavirus Amendment Regulations, the statutory requirement to make hard copies of plans available (Reg 35 - The Town and Country Planning (Local Planning) (England) Regulations 2012) must be met through enabling the physical inspection of relevant documents. If it cannot be complied with due to government legislation and guidance on Covid-19 and social distancing measures or any future legislation and guidance issued for similar health or security challenges that may arise, the Local Plan process will be delayed until the requirement to make documents available can be met.

¹⁰ Following the end date of the temporary Coronavirus Amendment Regulations, where it is possible to inspect documents whilst adhering to any social distancing measures relevant at the time of their inspection.

Activity	Involvement & Notification What we will do	When will you be involved?	How will you be involved?
			the EiP will be asked whether they still wish to do so.
Adoption (Regulation 26)	As soon as is reasonably practicable after the Local Planning Authority adopt a Local Plan we will: <ul style="list-style-type: none"> • Make available the adopted document/adoption statement/sustainability appraisal report for inspection¹¹ (includes web site) • Notify anyone who requested to be notified of adoption • Send an adoption statement to the Secretary of State 		All statutory consultation bodies and anyone else who submitted a representation will be notified. Electronic copies of the adopted document will be sent to specific consultation bodies and be made available to others on the website, at local libraries or for purchase ¹² . The Council will also use social media as a means of communication.

¹¹ Following the end date of the temporary Coronavirus Amendment Regulations, where it is deemed possible to make documents available for inspection whilst complying with government guidance and any relevant legislation for social distancing requirements that is in place at the time of documents' adoption, this will be undertaken as soon as reasonably practicable.

¹² The ability to view or purchase hard copy documents will be subject to compliance with government guidance and any relevant legislation for social distancing requirements that is in place at the time of the documents' adoption.

Table 3 Procedures and Methods for Public Involvement in Supplementary Development Documents (SPD)

Activity	Involvement & Notification What we will do	When will you be involved?	How will you be involved?
Draft SPD - Public Participation (Regulation 12)¹	<p>Copies of SPD documents and a statement of the SPD matters will be made available for inspection on the Council's website and at Council Offices and such other places considered appropriate¹³.</p> <p>The Council will also notify the general public via local advertisement/press releases where deemed appropriate and carry out a targeted engagement with local residents for site specific SPD's.</p>	<p>Specific and general consultation bodies, identified by the Council as relevant to the context of the SPD, will be notified of the consultation prior to the publication of the document.</p> <p>The consultation will run for a period not less than 4 weeks. The Council will opt to consult for 6 weeks in the context of SPD's to ensure maximum opportunity for engagement.</p>	<p>For site specific SPD's, the Council will seek to engage with local residents/businesses, for example through forums such as Community Planning Events, Neighbourhood Forums and Focus Groups in the early stage of developing the SPD and continue engagement through to adoption¹⁴.</p> <p>The Council will also use social media as a means of communication</p> <p>For issue based SPDs appropriate groups and organisations will be involved in developing the SPD. Dependent upon the subject matter of the SPD, the Local Planning Authority may employ further engagement techniques as deemed appropriate.</p>
Adoption (Regulation 14)	<p>As soon as is reasonably practicable after the Local Planning Authority adopt a SPD they must:</p> <ul style="list-style-type: none"> • Make available for inspection on the Council's website and at Council Offices and such 		<p>All relevant statutory/general consultation bodies and anyone else who submitted a representation will be sent the adoption statement.</p> <p>The Council will also use social media as a means of communication</p>

¹³ Following the end date of the temporary Coronavirus Amendment Regulations, the statutory requirement to make hard copies of plans available (Reg 35 - The Town and Country Planning (Local Planning) (England) Regulations 2012) must be met through enabling the physical inspection of relevant documents. If it cannot be complied with due to government legislation and guidance on Covid-19 and social distancing measures or any future legislation and guidance issued for similar health or security challenges that may arise, the consultation process will be delayed until this requirement to make documents available can be met.

¹⁴ Such events will be held subject to suitable social distancing measures being put in place until such a time as it is not necessary for social distancing to be practiced. In the event this is not possible, or it is deemed inadvisable to hold face-to-face workshops to ensure reasonable social distancing measures may be upheld, the Council will employ alternative methods for seeking input from local residents and businesses such as virtual forums or exhibitions on the Council's website, with the opportunity to submit feedback.

other places considered appropriate¹⁵ the adopted document, adoption statement and a summary of issues raised during consultation and how they were addressed;

- Notify anyone who requested to be notified of adoption

¹⁵ Following the end date of the temporary Coronavirus Amendment Regulations, where it is deemed possible to make documents available for inspection whilst complying with government guidance and any relevant legislation for social distancing requirements that is in place at the time of the documents' adoption, this will be undertaken as soon as reasonably practicable.

Table 4 Procedures and Methods for Public Involvement in Evidence Base Documents supporting the Local Plan

Activity	Involvement & Notification What we will do	When will you be involved?	How will you be involved?
Evidence Base Documents e.g. Strategic Land Availability Assessment/ Employment Land Review	<p>No statutory requirement to consult</p> <p>Depending on the subject matter, the Council will engage with local residents/organisations where deemed appropriate.</p> <p>e.g. Call for Housing sites as part of the Strategic Land Availability Assessment (SLAA)</p>	<p>As appropriate to each document at Regulation 18 and 19 stages in the context of the Local Plan.</p> <p>As appropriate to each document at Regulation 12 stage in the context of SPD's.</p>	<p>Groups and organisations appropriate to the subject matter will be invited to comment on evidence base documents where deemed appropriate.</p> <p>Documents once published will be available on the website, and on request. Documents will be publicised and comments invited as part of the work on the relevant Local Plan.</p>
Strategic Environmental Assessment/ Sustainability Appraisal (SA/SEA)	<p>As required by the Environmental Assessment of Plans and Programmes Regulation 2004, the Council will:</p> <ul style="list-style-type: none"> ○ Produce a Scoping Report at Regulation 12 stage for statutory consultation bodies to comment prior to undertaking the Options Consultation on Local Plans ○ Produce an Initial Sustainability Report for statutory consultation bodies and the public to comment on. This will be produced at the same time as the Options consultation for Local Plans <p>For the Environmental Report (Reg 13)¹⁶ the Council will:</p>	<p>As appropriate to each document at Regulation 18 and 19 stages.</p>	<p>Appropriate groups and organisations will be invited to participate in the Scoping process, in particular this will include: Historic England, Natural England and the Environment Agency.</p> <p>Draft versions of final documents will be sent to appropriate statutory consultees for comment before final publication.</p> <p>Documents once published will be available on the website, at the Council's principle office, at libraries¹⁷ and on request. Publication will be publicised and comments invited as part of the work on the relevant Local Plan.</p>

¹⁶ See The Environmental Assessment of Plans and Programmes Regulations 2004

¹⁷ Following the end date of the temporary Environmental Assessment of Plans and Programmes (Coronavirus) (Amendment) Regulations 2020, where it is deemed possible to make documents available for inspection whilst complying with government guidance and any relevant legislation for social distancing requirements that is in place at the time of the documents' publication.

Activity	Involvement & Notification What we will do	When will you be involved?	How will you be involved?
	<ul style="list-style-type: none"> • Send a copy to each statutory consultation body ○ Publicise the Report to all those having an interest in or likely to be affected by the plan or programme being assessed. ○ Advise where the document can be viewed or purchased. ○ Invite comments ○ Any person may make representations during the 6 weeks from the date of notice. ○ We must consider those representations <p>At the adoption of the Local Plan the Council will as soon as reasonably practicable (Reg 16):</p> <ul style="list-style-type: none"> • Make copies of the final Environmental report available to view or purchase. • Publicise the Report • Advise consultees of adoption <p><i>In addition, the Council will:</i></p> <ul style="list-style-type: none"> ○ <i>Publish summary of comments received on website</i> 		<p>Where the SA/SEA is the subject of an objection through the Local Plan process, all those who have submitted a representation of objection will be invited to attend the Examination. The Programme Officer will advise these individuals / organisations of the timetable on behalf of the Inspector.</p> <p>At adoption all statutory consultation bodies and anyone else who submitted a representation will be notified. Electronic copies of the adopted document will be sent to specific consultation bodies and be made available to others on the website, at the Council's principle office, at local libraries¹⁸ or for purchase¹⁹.</p>

¹⁸ Following the end date of the temporary Environmental Assessment of Plans and Programmes (Coronavirus) (Amendment) Regulations 2020, where it is deemed possible to make documents available for inspection whilst complying with government guidance and any relevant legislation for social distancing requirements at the time of their adoption.

¹⁹ The ability to view or purchase hard copy documents will be subject to compliance with government guidance and any relevant legislation for social distancing requirements that is in place at the time of the documents' adoption.

How will Comments and Responses on Local Plan Documents be dealt with?

- 3.4 In the early stages of drawing up ideas and options for the Local Development Documents including Local Plans, the Local Planning Authority will aim to acknowledge receipt of relevant representations on the day they are received. On occasions where a significant number of representations are received, all representations will be acknowledged within 2-3 working days. A summary of comments received will be produced and published on the website.
- 3.5 At the Pre-Submission public participation stage (Regulation 19) a standard response form will be produced which those wishing to comment will be encouraged to use. The Local Planning Authority will aim to acknowledge receipt of representations on the day received. All representations will be acknowledged within 2-3 working days. A summary of comments received will be produced and made available on the Council's website at the time of submission to the Secretary of State.
- 3.6 All representations²⁰ received will be made available to the public with relevant personal information redacted. At each stage of consultation a report to the Executive will be produced listing a summary of all representations received, and if appropriate, an Officer Response to representations. The report will also carry a recommendation as to what change if any should be made. The results of any such consultation will be reported and taken into account in decisions made by, and on behalf of, the Council.

4 Neighbourhood Plans

- 4.1 Neighbourhood plans were introduced in the Localism Act 2011 and are prepared by communities to inform the planning of their local areas. These plans can be prepared by Parish or Town Councils, Neighbourhood Forums or community organisations that meet the criteria for qualifying bodies. Neighbourhood plans set out policies for the development and use of land in a local area or neighbourhood. They are required to be in general conformity with strategic policies in the development plan. Once adopted, a neighbourhood plan forms part of the development plan and has the same status as a local plan.
- 4.2 As adopted neighbourhood plans form part of the Development Plan for Surrey Heath, it is important that work is co-ordinated between the preparation of the Surrey Heath Local Plan and neighbourhood plans. Neighbourhood plans must follow legal requirements for consultation to ensure the views of the local community have informed the plans preparation. Plans are also subject to independent examination and local referendum as part of the preparation process.
- 4.3 Local planning authorities are required to help communities in the process of preparing a neighbourhood development plan, but the plan-making process itself must be community led. Appendix 2 sets out a summary of the neighbourhood plan process and responsibilities. The Council has a statutory role in the preparation of neighbourhood plans as follows:
- Designating the neighbourhood area and neighbourhood forum;
 - Publicising the submitted neighbourhood plan;

²⁰ Some consultation responses may be deemed 'inappropriate' for publication i.e. libellous or threatening comments and will not be made public at the discretion of the Council.

- Arranging and funding the examination;
- Publicising the examiner's report and plan proposal decision;
- Arranging and funding the referendum;
- Adopting the Plan.

4.4 Table 5 below sets out the support that the Borough Council can provide at different stages in the preparation process.

Table 5 Steps in preparing a Neighbourhood Plan

Stage	Borough Council support
Designation as a Neighbourhood Area/Neighbourhood Forum	<ul style="list-style-type: none"> • Advise as to the information required to submit an application for designation as a Neighbourhood Area or Neighbourhood Forum; • Carry out any relevant consultation; • Determine the outcome of the application and advise the Qualifying Body accordingly.
Evidence to support the neighbourhood plan	<ul style="list-style-type: none"> • Advise on evidence available to support the Local Plan and other planning documents and sources of information which may be relevant to the neighbourhood plans
Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA)	<ul style="list-style-type: none"> • Undertake an SEA and HRA Screening for the neighbourhood plan. If full assessments are required this is the responsibility of the Qualifying body.
Pre-submission preparation and consultation	<ul style="list-style-type: none"> • Provide a list of Strategic development policies • Advise on the statutory process for pre-submission • Provide a contact list for statutory consultees as defined in Schedule 1 of The Neighbourhood Planning (General) Regulations 2012 (as amended); • Provide comments and advice on specific issues proposed within a NP where officer resources are available, where there is a direct link with the emerging Local Plan, and where there are issues likely to affect meeting the Basic Conditions; • Provide a high level review of a fully drafted (or close to fully drafted) Plan prior to • formal consultation where officer resources are available; and, • Provide a formal response to the Pre-Submission Consultation.
Submission and Examination	<p>Upon Submission to Surrey Heath, the Council will:</p> <ul style="list-style-type: none"> • Undertake a review to ensure that the Submitted Neighbourhood Plan complies with all the statutory requirements; • Confirm in writing to the Qualifying Body whether the Plan meets these requirements;

	<ul style="list-style-type: none"> • Undertake statutory consultation on the Submission NP for a minimum of 6 weeks; • Notify consultation bodies identified in the Consultation Statement; and, • Provide a formal response to the Submission Plan as part of the consultation process. <p>In relation to independent Examination of the Plan, the Council will:</p> <ul style="list-style-type: none"> • Appoint, and fund an Examiner for the Plan in discussion with the relevant Qualifying Body; • Produce a summary of representations from the Submission consultation to be sent to the Examiner and to the Qualifying Body and placed on the website; • Communicate examination timetables and progress with the Qualifying Body; • Discuss the independent Examiners Report on the NP with the Qualifying Body; • Consider at Executive the Examiners recommendations and make a decision as to whether to proceed to referendum; • Amend the Plan in line with the Examiners Report in conjunction with the Qualifying Body; and, • Issue a Decision Statement setting out its reasons for accepting or otherwise the Examiners modifications.
Referendum	<ul style="list-style-type: none"> • Liaise with the Qualifying Body on the Referendum date (which will be subject to resources and workloads of the Elections team); • Organise, fund and run the local referendum.

5 Planning Applications

- 5.1 The Council has a duty to consider all valid planning applications it receives, regardless of whether or not they reflect adopted policies. Most people become involved in planning as a result of commenting on or submitting a planning application. The majority of planning applications received are minor developments for which meeting the statutory minimum requirement on consultation is sufficient. Where the process of consulting on and determining planning applications is affected by legislation and guidance relating to Covid-19 or similar health or security challenges that may arise, the Council will ensure that those requirements are met which may result in some minor amendments to the process and procedures set out below. Any significant changes will be highlighted on the Council's website.

Minor Developments

- 5.2 Planning applications falling within this category include:

- Dwellings schemes of 1-9 units or less than 0.5 hectares (including Gypsy and Traveller pitches);
- For all other uses Office/light industrial, general industrial, retail), a minor development is one where the floorspace to be built is less than 1,000 square metres or where the site area is less than 1 hectare;

Major Developments

- 5.3 A major development includes the following:

- Dwellings schemes of 10 units or above and sites over 0.5 hectares (including Gypsy and Traveller pitches);
- For all other uses, a major development is one where the floorspace is 1,000 square metres or above or where the site area is above 1 hectare.

Other Development

- 5.4 Other development includes the following:

- Householder applications
- Change of Use (no operational development)
- Advertisements
- Listed Building extensions/alterations
- Listed Building demolition
- Application for relevant demolition of an unlisted building within a Conservation Area
- Certificate of Lawfulness (191)

- 5.5 The Council will consult in accordance with the statutory requirements of the Town and Country Planning (General Development Procedure) Order 2015 as follows: to consult with the Parish Council, to notify adjoining owners or occupiers²¹ by letter or by display of a site notice, consult with statutory bodies as appropriate and for some applications

²¹ Adjoining owner or occupier means any owner or occupier of any land adjoining the land to which the application relates. Typically this is any property adjoining the red line of the application site.

advertise in a local newspaper (e.g. listed building consent). Site notices may be displayed for some applications. Departures from the Development Plan are advertised by a site notice and in a local newspaper. In addition, applications are publicised on a Weekly List which is available on the Council's website. Following the case officer site visit a wider neighbour notification can be undertaken if deemed appropriate. Neighbours are given 21 days to respond to the first notification and typically either 14 or 7 days for subsequent notifications of amended plans. Additional time will be afforded for any bank holidays falling within the consultation period.

- 5.6 In addition the Council will consult other non-statutory bodies and organisations which represent specialist interest groups, such as the Surrey Wildlife Trust. Where a major planning application has implications for a service provider such as the Health Service these will be consulted at an early stage in the process.
- 5.7 Comments supporting or objecting to a proposal may be made by anyone regardless of whether they have received a letter or been individually notified. However, the Council can only take into account material planning considerations.
- 5.8 Comments should be submitted as soon as possible, although the Council will take into account any representations received up to the date on which the decision is made. The Council will not determine any application within a period of 21 days from the date on which notification letters are sent out or within the consultation period. Occasionally, it may be necessary to write and publish reports on planning applications for the Planning Applications Committee agenda before the expiration of the 21 day period. In such cases comments received post-publication will be reported orally at the committee meeting. Comments received are made available for public inspection on the Council's website and at the Council Offices and none can be treated as confidential²².
- 5.9 The Council will neither acknowledge nor respond to letters commenting on applications, nor enter into correspondence on the details or merits of proposals and this is stated in notification letters, site notices and on the website.
- 5.10 The Council's practice is not to negotiate amendments to applications unless they are of a minor nature. In a few cases though, amendments may be appropriate. Where such revisions are significant and raise new issues that could lead to further comment, the Council will re-notify those who were initially notified of the application and any others who have commented upon it. 14 days are usually given for re-consultation comments. Where amendments are to take place, it is often difficult to meet the statutory determination period and so an extension of time agreement is normally sought.

Deciding Applications

- 5.11 The majority of applications are determined under authority delegated to Executive Head of Regulatory after full consideration of all the planning issues and comments received. Planning applications can also be referred to the Council's Planning Applications Committee for determination.

²² Some consultation responses may be deemed 'inappropriate' for publication i.e. libellous or threatening comments and will not be made public at the discretion of the Council.

- 5.12 Public speaking at Planning Applications Committee meetings will be permitted in respect of a planning application and any other related consent applications to be determined by the Committee, where:
- a) there have been 10 or more written representations from separate households, or a petition signed by more than 50 signatories with addresses, in respect of an application for development within an urban area or village settlement, as defined by the Development Plan; or
 - b) there have been 5 or more written representations from separate households, or a petition signed by more than 25 signatories with addresses, in respect of an application for development outside an urban area or village settlement, as defined by the Development Plan.
- 5.13 In order to be counted in relation to the public speaking procedure, the representations or petitions must have been received no later than 10 working days before the date of the Committee meeting.
- 5.14 Where an application triggers the public speaking procedure, all those who have submitted written representations in compliance with paragraph 5.12 above, will be notified and invited to register to speak at the Committee meeting.

Surrey County Council Planning Applications

- 5.15 Some planning applications are determined by the County Council, including proposals affecting County owned land (e.g. schools) and proposals for mineral working and waste disposal. The Borough Council is consulted on these proposals but does not make the ultimate decision. Consultation responses in respect of these applications should be sent to the County Council.

Community Involvement at the Pre –Application Stage

- 5.16 Pre-application discussions with prospective developers/applicants and/or their agents are welcomed and are treated as confidential.
- 5.17 The Council will encourage applicants and developers to discuss their proposals with their neighbours or the community before submitting their formal application. This will not affect the statutory notifications undertaken by the Council upon registration of the application. Table 6 sets out suggestions for approaches that could be adopted by applicants. The benefit of early engagement with the community is that this may reduce delays when an application is submitted. The applicant will also be able to demonstrate how the views of the local community have been incorporated or why this was not possible.
- 5.18 In reporting the outcome of any pre-planning application consultation, applicants should indicate:
- The method of consultation used
 - Who was consulted and the level of involvement
 - How the matters raised in the consultation were addressed by the applicant.
- 5.19 The level of community engagement should reflect the scale of the proposed development.

- 5.20 The Borough Council will remain impartial and not get involved with any pre-application community engagement undertaken by the applicant.

What the Council cannot do

- 5.21 The Council can only request, not require developers to involve the local community. The Council cannot refuse planning applications because a developer refuses to contact and involve the local community.

Table 6 Suggested measures for applicants to involve the public at the pre – application stage²³

Development Type	Letter/ leaflet to and/or discuss with neighbour	Meeting or other event to discuss proposals with neighbours and community/ amenity groups	Exhibition and/or public meeting with neighbours, local businesses and community/ amenity groups and consultation bodies	Publicise proposal on a website	Design exercise or similar. Event should be publicised in local media
Minor Development	Yes	Yes			
Small scale Major Development	Yes	Yes	Yes	Yes	
Large scale Major Development	Yes	Yes	Yes	Yes	Yes

6 Data Protection

6.1 In order to register comments on applications and local plan documents, the Council requires contact details which will help us to contact you in regard to the comments made. There are also statutory requirements requiring copies of comments to be made publically available.

6.2 The Council will publish names and associated representations on its website but will not publish personal information such as telephone numbers, or email addresses.

6.3 In accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 personal information will only be used for appropriate purposes, as agreed when originally provided. The information will only be kept for the necessary period

²³ Subject to complying with legislation and guidance relating to Covid-19 or any future legislation and guidance issued for similar health or security challenges that may arise.

of time required. The Council has an updated privacy policy which can be viewed on the website <https://www.surreyheath.gov.uk/council/information-governance/how-we-use-your-data>

APPENDICES

Appendix 1: Consultation bodies for the Local Plan

Specific Consultation Bodies²⁴

- (a) the Coal Authority,
- (b) the Environment Agency,
- (c) Historic England (formerly part of English Heritage),
- (d) the Marine Management Organisation,
- (e) Natural England,
- (f) Network Rail Infrastructure Limited (company number 2904587),
- (g) Highways England (formerly the Highways Agency)
- (h) a relevant authority any part of whose area is in or adjoins the local planning authority's area,
- (i) any person—
 - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003, and
 - (ii) who owns or controls electronic communications apparatus situated in any part of the local planning authority's area,
- (j) if it exercises functions in any part of the local planning authority's area—
 - (i) a Clinical Commissioning Group;
 - (ii) a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989;
 - (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(a);
 - (iv) a sewerage undertaker; and
 - (v) a water undertaker;
- (k) the Homes and Communities Agency; and
- (l) where the local planning authority are a London borough council, the Mayor of London;
- (m) Civil Aviation Authority
- (n) Transport for London
- (o) Enterprise M3 Local Enterprise Partnership
- (n) Office of Rail regulation

General Consultation Bodies²⁵

²⁴ As specified in Part 1(2) of The Town and Country Planning (Local Planning) (England) Regulations 2012: http://www.legislation.gov.uk/uksi/2012/767/pdfs/uksi_20120767_en.pdf

²⁵ As specified in Part 1 (2) of the Town and Country Planning (Local Planning) (England) Regulations 2012: http://www.legislation.gov.uk/uksi/2012/767/pdfs/uksi_20120767_en.pdf

- (a) voluntary bodies some or all of whose activities benefit any part of the local planning authority's area,
- (b) bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area,
- (c) bodies which represent the interests of different religious groups in the local planning authority's area,
- (d) bodies which represent the interests of disabled persons in the local planning authority's area,
- (e) bodies which represent the interests of persons carrying on business in the local planning authority's area (including the Council's Economic Development Team);

Where deemed appropriate, the Council will also consult with relevant Equalities Groups, whose activities benefit the whole or part of the Authority's area.

Local Equality Groups in Surrey Heath

Religious/Ethnic Minority Leaders in Surrey Heath
Churches Together in Camberley and Churches @ GU16 for Frimley
Bengali Welfare Association (Muslim representative)
Chairman of Nepalese Buddhist Community UK
The Buddhist Community Centre UK (BCCUK) Youth Association
SH Sikh Association
BME Development Manager
Surrey Faith Links Advisor
Older People Groups
Tringhams West End Day Centre
Surrey Heath Age Concern
University of 3 rd Age
Young People Groups
Tomlinscote School Students Representatives
Kings International College Student Representatives
Collingwood College Student Representatives
Surrey Heath Youth Council
Disability Groups
Delivering Empowerment Coordinator
Disability Initiative
Disability Access Surrey Heath (DASH)
Surrey Deaf Forum
Gender Groups
Your Sanctuary
Bagshot Women's Association and Trustee of the Surrey Federation of Women's Institutes (SFWI)
Sexual Orientation Groups
Gay Surrey (registered charity for all gay, lesbian, bisexual, and trans people in Surrey)
OutlineSurrey (support service for people with their sexuality and gender identity)
Voluntary Services Groups
Blackwater Valley Countryside Trust
Blackwater Valley Alzheimer's Society
Gypsy and Traveller Groups
Surrey Gypsy and Traveller Communities Forum

Appendix 2: Summary of Neighbourhood Plan Process

Stage	Task	Who
Step 1 Neighbourhood Area	<ul style="list-style-type: none"> Make application to SHBC for designation as a Neighbourhood Area 	Qualifying body submits application SHBC determines
Step 2 Preparing a Draft Plan	<ul style="list-style-type: none"> Gather baseline information and evidence Engage and consult those living and working in the neighbourhood area and other stakeholders Identify a vision and objectives Identify and assess options Determine whether the Plan is likely to have significant environmental effect (and therefore whether a Strategic Environmental Assessment(SEA) and/or Habitat Regulation Assessment (HRA)is required) Start to prepare proposals documents 	Qualifying body (SHBC can provide a screening opinion in relation to SEA and HRA)
Step 3 Pre-submission publicity and consultation	<ul style="list-style-type: none"> Prepare and Publicise the draft Plan and invite representations (statutory 6 weeks) Ensure compliance with any Environmental obligations (as Step 2) Consider consultation responses and amend plan if appropriate Prepare Consultation Statement and other submission documents 	Qualifying body
Step 4 Submission of the Plan to Surrey Heath Borough Council	<ul style="list-style-type: none"> Submit the Plan (and supporting documents) to SHBC Check the submitted Plan and documents comply with relevant legislation Publicise the Plan for 6 weeks Appoint an independent examiner 	Qualifying body SHBC SHBC (with Qualifying body)
Step 5 Independent Examination	<ul style="list-style-type: none"> Send Plan, representations and supporting documents to Examiner Examination takes place (usually by written representation) Examiner issues a report to SHBC and Qualifying body Publish Examiners report Considers report recommendations and makes changes to the Plan Decide whether to send the plan to referendum (Executive) 	SHBC Examiner Examiner SHBC SHBC (with QB) SHBC
Step 6 Referendum	<ul style="list-style-type: none"> Publicise forthcoming referendum (28 working days notice) Undertake referendum 	SHBC
Step 7 Make the Plan	<ul style="list-style-type: none"> Providing the Plan is compatible with EU obligations make the Plan part of the Surrey Heath Development Plan (Executive and Council) 	SHBC

Appendix 3: Glossary of Terms for Community Involvement

Throughout this document a number of abbreviations and specific terms have been used as follows:

AAP Area Action Plan.	A Development Plan Document Plan for a specific area, such as the Camberley Town Centre AAP.
Amenity Bodies	These are groups that operate within Surrey Heath such as local village societies, historic trusts, preservation societies, open space societies etc.
AMR Authorities Monitoring Report.	An annual report which includes an update of how Local Plan policies are being delivered.
BME's	Stands for Black and Minority Ethnic groups whose needs should be recognised and addressed
Citizens Panel	Local residents who have volunteered to provide information and input to the Council on issues and problems in the Borough and comments on proposed policies and documents.
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.
Focus Groups	These would be set up to discuss local issues or options for development and would comprise a cross section of individuals representing the local community
Key Stakeholders	These are the organisations whose input into the community or the issue being considered is particularly important. For example for health issues the local Clinical Commissioning Group would be a key stakeholder.
Large scale Major Developments	A large scale major development is one where the number of residential units to be constructed is 200 or more or where the floor space to be built is 10,000 square metres or more, or where the site area is 2 hectares or more. Where the number of residential units or floor area proposed to be constructed is not given in the application a site area of 4 hectares or more should be used as the definition of a major development.
LDD Local Development Document.	This is a document or documents prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding : (i) the development and use of land which the local planning authority wish to encourage during any specified period; (ii) the allocation of sites for a particular type of development or use.

	The Local Plan Development Plan Document is a Local Development Document.
LDS Local Development Scheme.	The Local Development Scheme (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.
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 2012.
Major Development	As defined in the Town and Country Planning (Development Management Procedure)(England) Order 2015 "major development" means development involving any one or more of the following— (a) the winning and working of minerals or the use of land for mineral-working deposits; (b) waste development; (c) the provision of dwellinghouses where— (i) the number of dwellinghouses to be provided is 10 or more; or (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within subparagraph (c)(i); (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or (e) development carried out on a site having an area of 1 hectare or more; "mining operations" means the winning and working of minerals in, on or under land, whether by surface or underground working.
Neighbourhood Forums	Groups set up to represent their neighbourhood input into the planning process who could meet regularly to discuss planning issues affecting the local area and provide an opportunity for community involvement. Such groups could be formed in response to a single issue or large scale planning application or meet regularly as a recognised community group involved with the Borough Council in planning matters.
Neighbourhood Plans	Prepared by communities to inform the planning of their local areas. Plans can be prepared by Town or Parish Councils or by Neighbourhood Forums. Once adopted they form part of the Development Plan for the Borough.
SA/SEA Sustainability Appraisal incorporating a Strategic	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

Environmental Assessment.	Purchase Act and the 2001/42/EEC European Directive.
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 Development Documents and planning applications.
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.
SHBC Surrey Heath Borough Council.	Surrey Heath Borough Council is the Local Planning Authority.
Small scale Major Developments	A small scale major development is one where the number of residential units to be constructed is between 10 and 199 (inclusive) and where the floor space to be built is 1,000 square metres and up to 9,999 square metres or where the site area is 1 hectare and less than 2 hectares. Where the number of dwellings to be constructed or floor area proposed is not given in the application a site area of 0.5 hectare and less than 4 hectares should be used as the definition of a small scale major development.
SPD Supplementary Planning Document	These are documents that provide further information and additional detail to the policies within the Local Plan.
Stakeholders	Those organisations and individuals having a particular interest in an issue or proposal by virtue of residency, ownership, service provision or statutory responsibility etc.

This page is intentionally left blank



Great Place • Great Community • Great Future

Statement of Consultation Statement of Community Involvement (SCI)

January 2020

Introduction

This statement sets out comments received and the Council's response to the Surrey Heath Borough Council's consultation on the updated Statement of Community Involvement.

The updated Statement of Community Involvement update was consulted on from Tuesday 5th November 2019 until Tuesday 17th December 2019.

Letters and e-mails were sent out to residents and organisations on the Council's Local Plan database, neighbouring authorities, Parish Councils and those Specific and General Consultation Bodies, and Local Equality Groups set out in Appendix 1 of the draft Statement of Community Involvement. The consultation was advertised on the front page of the Council's website, and the Council's social media platforms. The consultation was also accessible online at <https://consult.surreyheath.gov.uk/consult.ti/SHBCSCI>

In summary, the changes to the Statement of Community Involvement following consultation are as follows:

- Page 6, paragraph 1.8 – Add further bullet point: *“Members of the public who do not have access to, or the means to use the Internet.”*
- Page 9, Table 2 – Amend Table 2 column 2 row 1 to include the following statement: *“Make Local Plan documentation available to view as part of the consultation.”*
- Page 22, Appendix 1 – Add a footnote reference to The Town and Country Planning (Local Planning) (England) Regulations 2012 for Specific Consultation Bodies and General Consultation Bodies.
- Page 23, Appendix 1 – Amend title of Local Equality Groups Table to *“Local Equality Groups in Surrey Heath”*.
- Page 23, Appendix 1 – Amend Local Equality Groups Table to include a section for Gypsy and Traveller Groups. Include within this section the Surrey Gypsy and Traveller Communities Forum.
- Page 25, Appendix 3 – Add definition for Large Scale Major Development to Glossary of Terms for Community Involvement.
- Page 27, Appendix 3 – Add definition for Small Scale Major Development to Glossary of Terms for Community Involvement.

Responses to the Draft Statement of Community Involvement (SCI)

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
Chobham Parish Council	<p>Thank you for inviting Chobham Parish Council's views on the above consultation. The Council very much believes in community engagement in the planning system and supports the aims of the statement.</p> <p>After reviewing the draft document, the Council would like to make the following observations and comments:</p> <ol style="list-style-type: none"> 1. As one of the principles of community involvement is identified as "increased focus on the priorities identified by the local community" (paragraph 1.5), the Parish Council wonders whether more could be done to ensure Surrey Heath Borough Council (SHBC) is aware of the priorities at a very local level in Chobham. The Parish Council would welcome any opportunity to explore this issue further. 2. Now that planning applications and planning policy documents are almost all published exclusively online, it is of great importance that there is no delay in their publication and that they are easily accessible 24/7, particularly during consultation periods. Online feedback forms should be user-friendly and not overly prescriptive or repetitive (e.g. not selecting from a set of pre-defined responses or forcing a response to every section of longer consultations). 3. As a key user of SHBC's online planning pages, the Parish Council feels it would have been appropriate to have been consulted at an early stage before the implementation of the new online system. It is felt that the lack of consultation was a missed opportunity to ensure that the new system would be set up to suit users' needs. The Council would appreciate 	<p>Noted. SHBC recognises the importance of appropriate partnership working with Parish Councils on local issues and encourages an ongoing dialogue.</p> <p>Noted. All public planning policy consultations will continue to be accessible on the Council's website and will be available throughout the full duration of the relevant consultation period. Planning applications will also remain accessible on the Council's website at all times (notwithstanding any temporary technical issues that are beyond the Council's control).</p> <p>Noted. The Council's consultation and planning application systems have been subject to procurement processes in accordance with the Council's guidelines.</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>being consulted on any future major changes which could affect its workflow.</p> <p>4. While it is understood that the Planning Authority cannot require developers to involve the local community, SHBC is in a position to help developers recognise the value and benefits of genuine engagement with the community from an early stage. There remains a perception that public engagement is a “tick box exercise” for developers and recent experiences in Chobham have done nothing to change that view.</p> <p>5. The Parish Council has previously written to the Borough Council regarding its concerns around changes to planning laws affecting High Streets. Since that letter, it appears there are even more widespread plans to extend permitted development rights. Community involvement cannot take place if changes are made at government level that remove the chance for occupiers, neighbours, local people and groups to have a say. The Parish Council urges the Borough Council to resist changes to legislation that undermine public involvement in the planning process.</p> <p>6. It is noted that the topics of appeals and enforcement do not appear to be covered in the document. The Parish Council suggests that as these are planning matters where the community has an interest, it may be appropriate for the Planning Authority to detail how it will involve the community and stakeholders in these areas.</p> <p>7. Chobham Parish Council previously discussed with SHBC the possibility of holding a public meeting regarding potential</p>	<p>Noted. Not within the scope of the SCI. The SCI is a document that sets out how the community will be involved in the various stages of plan making and in consulting on planning applications and preparation of neighbourhood plans in Surrey Heath.</p> <p>Noted. The Council endeavours to continue to respond to government consultations that are held in relation to any proposed changes to permitted development rights, as appropriate.</p> <p>The SCI explains to the community how and when they can be involved in the preparation of planning policy documents, the determination of planning applications, and neighbourhood planning. It is not within the scope of the SCI to set out community involvement in appeals or enforcement cases.</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>re-development of the Fairoaks Airport site. SHBC advised that its preferred approach for such a meeting would be to listen to what the public have to say rather than give a prepared speech. The meeting did not end up taking place, but could have been a valuable way to involve the public at an early stage. The Planning Authority may wish to consider including a public meeting as part of its standard process when potential development is of a scale affecting large numbers of people within the Borough.</p> <p>8. The SCI draft document mentions petitions in relation to how many signatories are required to trigger public speaking at a Planning Applications Committee meeting, but does not seem to cover or sign post how the Council will respond to planning-related petitions themselves and what action can be expected.</p> <p>9. It is suggested that the "hard to reach" groups listed in paragraph 1.8 could include members of the public who are not online and/or not confident with technology.</p> <p>10. On a general note, it is felt that public confidence and trust in the planning system is vital to encouraging engagement. Upholding planning conditions, swift action to deal with breaches, equality and consistency of planning decisions, evidence that views and comments have been taken into</p>	<p>Noted. The SCI sets out that applicants should submit a Statement of Community Engagement, as required in the Surrey Heath Local Validation List and Guidance Document, 2014, where community engagement has been undertaken, or as a matter of course for applications involving 10 or more dwellings or 1000 sq. metres commercial increase.</p> <p>Noted. The Council has no set procedures for responding to petitions relating to planning application sites beyond those referenced in the SCI. Paragraph 5.7 of the SCI sets out, "<i>comments supporting or objecting to a proposal may be made by anyone regardless of whether they have received a letter or been individually notified.</i>" This could include any comments submitted as part of a petition or through a local group.</p> <p>Noted. Paragraph 1.8 of the SCI will be amended to contain an additional bullet stating:</p> <ul style="list-style-type: none"> • "<i>Members of the public who do not have access to, or the means to use the Internet.</i>" <p>Noted. The Council recognises the importance of community engagement.</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>account, and many other factors play an important part in maintaining or restoring such confidence. I trust that the above feedback is useful and, as always, if the Council can provide any further information or clarification around the above points, please do not hesitate to contact me.</p>	
Historic England	<p>The consultation process detailed in the SCI should be adequate in meeting the requirements of the Local Development Regulations 2004. It will be important to ensure that stakeholder organisations with interests and responsibilities in the historic environment, at national and local levels, are fully involved throughout the consultation process. To this end, it is important to consult with both the Council's own conservation officer or team and local amenity societies. In terms of the general requirements of consultation in relation to the historic environment, I attach a Note on Consultation with the Heritage Sector and a list of national amenity bodies.</p>	Noted.
Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals.</p> <p>We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service</p>	Noted.

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	at the following address: consultations@naturalengland.org.uk. This system enables us to deliver the most efficient and effective service to our customers	
Surrey County Council	Thank you for consulting Surrey County Council on the Surrey Heath Statement of Community Involvement. We do not have any comments to make.	Noted.
Waverley Borough Council	Thank you for giving Waverley Borough Council the opportunity to comment on the above consultation. We have concluded that we do not wish to comment on any specific issues. However we look forward to hearing from you regarding future consultations.	Noted.
Windlesham Parish Council	<p>At a meeting of this Council held on Tuesday 26th November, the draft Statement of Community Involvement was considered by Councillors and I am now submitting this representation on behalf of my Council.</p> <p>As a general comment, if the SCI is concerned with the promotion of effective public participation, then consideration should be given to the language that is very often used in consultations. It can often be difficult to understand without a background knowledge of the issues and therefore language and terminology that can be universally understood should be utilised.</p> <p>As a further general comment, consultation responses should allow "free dialogue" boxes, alongside specific and direct questions as this Council feels that very often those who respond are being led down certain routes to give a determined response.</p>	<p>Noted. Consultations often contain technical material and references. Whilst every effort will be made to ensure that the documentation is accessible to as wide an audience as possible, there will be instances where the subject areas covered may contain information that requires some additional background reading in order to fully appreciate the subject matter.</p> <p>Noted. During Planning Policy consultations, general comments can be submitted in addition to comments that respond to specific questions. However, in order to encourage comments that are relevant to the</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>Finally, consultation material should be distributed as widely as possible and using as many channels as possible. The Council supports the SCI statements that Surrey Heath will explore how best to use digital technology but also want to emphasise that for some residents paper/hard copy formats will always be preferable. Although these are currently provided and sent to local libraries, the signposting for this is not always obvious and could be improved.</p> <p>With regard to planning applications specifically, the Parish Council acts a statutory consultee. There have been issues recently with the migration of data to a new system which has caused access problems and a great deal of difficulty trying to locate all the relevant documents for any given planning application. These issues will hopefully resolve as time goes on. However, the Parish Council Planning Committee have on a number of occasions found that applications have been determined before the 21 day deadline and therefore the Committee has been unable to make a comment due to the timings of committee meetings. The most recent example – planning application 19/2139/LLD – had an expiry date of 4th December. The Planning Committee meeting held on 3rd December would have allowed the committee to make a comment and for it to be submitted in time to be considered. However, the planning decision was made and posted online on 2nd December.</p> <p>The SCI document states that “no application will be determined within a 21-day period from the date on which notification letters are sent out.” These rules need to be consistently followed by planning officers, otherwise the inclusion of the statement in the SCI is misleading.</p>	<p>consultation material, it is considered useful to include targeted questions located within specific topic areas.</p> <p>Noted. The Council would welcome suggestions for how the signposting for paper copies of consultation material available to residents could be improved.</p> <p>Noted. The Council has migrated its planning applications to a new system as the original software was significantly dated and not supported by its provider. During the transition period, some technical issues may be experienced whilst data is transferred onto the new system. However, this will be temporary and it is anticipated that normal service will resume as soon as possible.</p> <p>Under normal circumstances, consultation letters will be sent out well in advance of the application's expiry date, enabling the full 21-day period for responses to be received. Due to extenuating circumstances involving the</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
		<p>migration of planning applications to a new system in late 2019, there is a short period where notifications may have been issued later in the application process, thus impacting the timescales for receiving comments. Where it appears that the Parish Council committee date and expiry of a planning application are in close proximity, Surrey Heath Borough Council would encourage Parish Councils to notify the relevant case officer of this potential conflict. In such instances, officers will work with the Parish Council to retrieve any comments on a planning application before it is determined.</p>
Mr D Chesneau	<p>The document is more 'reader-friendly' than its predecessor, and this is to be welcomed.</p> <p>I have three comments:</p> <ul style="list-style-type: none"> - Firstly, the concept of 'local representative groups' is rather flawed. Many of the organisations listed towards the end of the document have not been formed to represent anyone. For example, take the University of the Third Age (now formally renamed U3A). Arguably U3A is highly non-representative of local older people - demographically, financially and educationally. Its views may well be useful - but they may not be representative. <p>Also, it does not appear that there is any representative group of Travellers, even though reaching such people is a particular aim of the SCI.</p>	<p>Noted. Amend wording in Appendix 1 to state, "<i>Local equality groups in Surrey Heath</i>".</p> <p>Noted. Amend Local Equality Groups Table in Appendix 1 of the SCI to include a section for Gypsy and Traveller Groups.</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>- Secondly, headings such as 'When will YOU be involved' are often inappropriate. They may not actually refer to any particular 'you'. Eg who is the 'you' in "Specific and general consultation bodies, identified by the Council as relevant to the context of the SPD, will be notified of the consultation prior to the publication of the document."? In reality, the document is largely a reference document (I trust that the council will use it!) not something to be read from start to finish. It would be better to refer to 'the community' rather than 'you'.</p> <p>- Thirdly, the draft mentions putting documents on the council website a number of times. This is a necessary, but fairly unambitious, way of communicating. Much wider use of the social media is essential to reach most residents these days. This needs to be highlighted, or the document will seem to be out-of-touch.</p>	<p>Noted. The SCI will be published on the Council's website and available for members of the public and community groups to read. No change required.</p> <p>Noted. The SCI document includes reference to using social media as a means of communication at four reference points in Table 2 - Procedures and Methods for Public Involvement in Local Plans.</p>
Mr S Greenway	Ref. ESSO pipeline replacement. I fear the construction work site in Deepcut will generate an awful amount of traffic to service the scheme now other hubs have been removed. We are already subject to a large amount of extra construction traffic due to the development of the Princess Royal Barracks site which is on-going. Therefore I object to Deepcut being subjected to more construction traffic due to a new project. Please put it elsewhere. Thank you.	Noted. Not within the scope of this consultation on the SCI.
Ms C Kingsley	<p>1. The Contents list: Page 17 is listed as containing Minor Developments, Smallscale Major Developments and Largescale Major Developments.</p> <p>2. Page 17 Para 5.3 Major Developments does not mention Smallscale or Largescale, never mind explaining what these are! Please include clarification of how these are defined.</p> <p>3. Table 5 suggests measures for involving the public in different scale developments, but again does not specify what these are. This needs attention.</p>	<p>Noted. Amend SCI document to add definitions for Small Scale Major Development and Large Scale Major Development at Appendix 3: Glossary of Terms for Community Involvement.</p> <p>Table 5 of the SCI refers to the steps in preparing a Neighbourhood Plan. Table 6 refers to small scale major development and</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>4. For Local Plan consultations, perhaps mention of a recommended time scale for notification of the public would be good. 'In a timely manner' perhaps? The last Local Plan consultation was 'advertised' in Heathscene only a few days before the consultation ended. Public displays of information were few, were not publicised sufficiently and finished weeks before many people realised they were happening. If the Council is serious in wanting to involve the public in plan-making, a lot more needs to be done to communicate effectively with residents. Not everyone uses social media and the Council needs to consider this.</p>	<p>large scale major development. Amend SCI document to add definitions for Small Scale Major Development and Large Scale Major Development at Appendix 3: Glossary of Terms for Community Involvement.</p> <p>All Local Plan consultations will be advertised on the Council's website, social media platforms, and local libraries and parish council offices, prior to commencement of the consultation, in accordance with Table 2 of the SCI: Procedures and Methods for Public Involvement in Local Plans. Public exhibitions and drop-in events will also be publicised through these channels. Heathscene magazine is produced quarterly, and therefore due to possible conflicts in timetabling, it will not always be possible to include reference to a Local Plan Consultation within Heathscene, prior to its commencement. However, the Council will endeavour to provide information about upcoming Local Plan consultations within the Heathscene magazine wherever feasible. Further engagement techniques may also be employed by the Council, as set out at column 2 row 4 of Table 2 of the SCI.</p>
Mr N Lennox	<p>It would be good to within this document define the levels of response that would indicate a positive consultation has been achieved. It is not acceptable to say that a document or policy has been "consulted on" merely because it has been through a process.</p>	<p>Noted. The Council will endeavour to publicise consultations on Local Plan documents with a range of outreach methods as outlined in Tables 1-4 of the SCI document. This complies with the Council's</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>If there has been very few responses further action should be taken to gain additional responses or to seek community involvement.</p> <p>A level of 5 - 10% of the impacted populations should be seen as a target response.</p> <p>As an example the recent consultation on the draft local plan was very poorly responded to as it was not well publicised or promoted and feedback was only passively sought. For a document that is as important as this active feedback needs to be sought and communities need to be engaged.</p>	<p>legal and statutory requirements for consultation. The methods of outreach include using social media, the Council's website, documentation in parish councils and libraries, and any further engagement techniques deemed appropriate.</p> <p>Whilst it is the Council's aim for consultations to reach as many members of the public, businesses and organisations as possible, the Council is not subject to target levels of response and can only encourage involvement in public consultations. Public participation in consultations is not mandatory, and it would therefore be ineffective to set specific response targets.</p> <p>All Local Plan consultations have been promoted in accordance with the engagement methods set out in the SCI at the time of that consultation. The Regulation 18 Local Plan 2018 consultation received 1,273 comments from 387 separate individuals or organisations.</p>
Mr G O'Connell	<p>General: The SCI revised draft is rather mechanistic and not very user-friendly. It seems to provide a basic framework to meet the legal minimum rather than aspiring to best practice. The focus is more on allowing individuals and groups to comment rather than true engagement and involvement. There is a real opportunity here for SHBC to step up and be proactive in seeking meaningful inputs from across the community.</p>	<p>Noted. Community engagement is a crucial element of the plan making process. The SCI sets out how the Council will involve the community in the preparation of the Surrey Heath Local Plan, the determination of planning applications and the preparation of neighbourhood plans. This includes contact and engagement through a range of</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>Table 2: At the Issues & Options stage it states that the LPA may employ further engagement techniques. This is no mention under what circumstances and is too weak. At the very least it should state that the LPA will 'undertake workshops with key stakeholders and may subsequently employ further techniques (such as those cited) dependent upon the feedback from the workshops.</p> <p>A draft of the Local Plan should be available for comment. This is implied but is not explicit.</p> <p>Table 3: How you will be involved in the Draft SPD indicates a number of methods but none of them specifically relate to under-represented groups. There is a real danger in practice that there will be continued (albeit unintended) exclusion of such groups.</p>	<p>methods. Efforts will also be made to involve hard to reach groups, as set out in the SCI.</p> <p>Noted. Examples of the further engagement techniques that may be employed are listed at column 2 row 4 of Table 2. This includes:</p> <ul style="list-style-type: none"> • Workshops for key stakeholders • Presentations to parish councils • Major articles in Council's Heathscene magazine to all households • Issue press release(s). <p>It is not possible to predetermine which additional engagement techniques are most appropriate to employ, as this will depend on the content of the specific Local Plan consultation.</p> <p>Noted. Amend Table 2 column 2 row 4 in the SCI to include the following wording: <i>"Make Local Plan documentation available to view as part of the consultation."</i></p> <p>Noted. The SCI references the consultation of general consultation bodies in Table 2: Procedures and Methods for Public Involvement in Local Plans and Table 3: Procedures and Methods for Public Involvement in Supplementary Development Documents (SPD). General consultation bodies are set out in Appendix 1 of the SCI, and include:</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>Table 4: Strategic Environmental Assessment / Sustainability Appraisal - this is a good example of focussing purely on the legal minimum. In view of the agreed Climate Crisis there needs to be more in this section. SHBC should commit to proactively engaging with the community in order to seek inputs and gain greater consensus on how the plan will contribute towards ever greater environmental protection and a zero carbon future.</p>	<p>a) voluntary bodies some or all of whose activities benefit any part of the local planning authority's area, b) bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area, c) bodies which represent the interests of different religious groups in the local planning authority's area, d) bodies which represent the interests of disabled persons in the local planning authority's area, e) bodies which represent the interests of persons carrying on business in the local planning authority's area (including the Council's Economic Development Team).</p> <p>Noted. Table 4 outlines the procedures and methods for public involvement in preparation of evidence base documents supporting the Local Plan, including the Strategic Environmental Assessment/Sustainability Appraisal. Therefore it is not appropriate to include specific reference to climate change within Table 4, in isolation of other evidence base topic areas. However, as part of the preparation of the Local Plan, the Council will be producing a climate change evidence base study. In turn, this will inform policy</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>3.6: having 'an Officer Response to representations' is sensible and appropriate. However, such responses are often reflective of the internal, official perspective and can be seen by the public, rightly or wrongly, as lacking the challenge, dynamic insight and community voice. As second, independent assessment of the representations would help inform the executive and offer greater balance.</p> <p>5.21: This rightly states that the Council cannot require a developer to involve the local community. However, it could go on to say that the Council will conduct its own consultation in certain circumstances such as for large or controversial schemes and for areas where local views are crucial (eg certain S106 issues that are outside the area where the planning application has been advertised). Take the case of the planned traffic lights in Frimley Green. No notices were placed on the Green because the planning application location was in Deepcut. Consequently Frimley Green residents were not consulted or engaged on this issue which has led to a protracted battle that could have been averted if there had been proper consultation at the outset.</p> <p>Table 6: This states possible methods which is fine. However, it would be useful for there to be further explanation below this table to emphasise that these tools will be used to illicit local knowledge, legitimate concerns, constructive ideas and meaningful engagement rather than simply comments and views. The key here is not just about listing a set of tools but committing to using them in line with best practice to get high quality information and involvement.</p>	<p>making in the Local Plan which will be subject to the consultation processes set out in the SCI.</p> <p>Noted. The Local Plan is a Council document. Therefore it is deemed most appropriate for the Council's Planning Policy officers to respond to representations made during consultations, and to provide recommendations to the Council's Executive Committee.</p> <p>Noted. No change. Paragraph 5.21 of the SCI refers to what developers are not required to do at pre-application stage specifically. Pre-application is a paid service provided by the Council for applications for potential future schemes in the Borough, and as stated in paragraph 5.16 of the SCI, are treated as confidential. It is therefore not within the Council's powers to consult on pre-application documentation submitted by developers. In addition, the release of material from the Council could prejudice the Council's position as decision maker for any forthcoming planning application at the site.</p> <p>Noted. Table 6 provides an indication for how applicants can involve members of the public at pre-application stage. Paragraphs 5.17 and 5.18 of the SCI provide an overview of the possible approaches that applicants</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>Appendix 1: General Consultation Bodies should include, explicitly, local bodies that represent residents. This is weakly implied but should be spelled out. If you want to include an example I'd suggest The Mytchett, Frimley Green & Deepcut Society.</p>	<p>could take to community engagement. However, there are no specific requirements or policies for applicants or developers to involve the public at pre-application stage, as it is a voluntary part of the planning process, and is not mandatory. It is therefore not within the scope of the SCI to dictate how the methods in Table 5 should be used; rather it is at the applicant's discretion.</p> <p>Noted. The definition of General Consultation Bodies is defined in The Town and Country Planning (Local Planning) (England) Regulations 2012, which has been directly quoted in the SCI. Voluntary bodies are included within the definition. The Council has employed this definition, for consistency with national planning law. Appendix 1 of the SCI will be amended to add a footnote reference to The Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
Ms J Sherrard-Smith	<p>A lengthy, dry, formal document seeking community involvement! Make it easier to read, keep it simple. Exampe: RE: telecommunication masts, antennae and cell deployment to support 5G and extend coverage: What information do / did you share with the general public about the UK Government consultation on proposed reforms to permitted development rights to support the deployment of 5G and extend mobile coverage that ended on 4th Nov 2019. https://www.gov.uk/government/consultations/proposed-reforms-to-permitted-development-rights-to-support-the-deployment-of-5g-and-extend-mobile-coverage</p>	<p>Noted. Central government consultations are not within the scope of the SCI. It is a requirement for the SCI to set out how the Council will involve the community in the preparation of the Surrey Heath Local Plan, the determination of planning applications and the preparation of neighbourhood plans.</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>What information are you sharing with the public about 5G? 5G as a military grade pulsed microwave system / use of LED lights in lamposts / health & safety issues including non-ionising radiation sickness & electromagnetic sensitivity / insurance and liability / impact on climate crisis - removal of trees, increase in use of power by IOT / environmental impact including aesthetic impact, damage to wildlife / monitoring, evaluation and regulation of EMF's / etc Please ensure the public are kept informed about the roll-out of wi-fi & 5G technology.</p>	<p>Where appropriate, Local Plan documents will include policies in relation to the implementation of 5G. Furthermore, the Council will seek to include policies in relation to loss of trees and climate change in the Local Plan. This will be consulted on in accordance with the methods set out in the SCI. It is not within the scope of the SCI to set out how information will be provided about central government consultations. However, efforts will be made by the Council to promote central government consultations that are relevant to Surrey Heath through the Council's media outlets.</p>

This page is intentionally left blank



Great Place • Great Community • Great Future

**Statement of Consultation for Statement of Community Involvement (SCI) -
version with amendments in response to Covid-19 or similar health or security
challenges that may arise**

September 2020

Introduction

This statement sets out comments received and the Council's response to the Surrey Heath Borough Council's consultation on the updated Statement of Community Involvement.

The Statement of Community Involvement update was first consulted on from Tuesday 5th November 2019 until Tuesday 17th December 2019.

A separate targeted consultation was undertaken in June and July 2020 regarding further minor changes to the Statement of Community Involvement that were made in response to the Covid-19 pandemic and social distancing measures. Specific and General Consultation Bodies were contacted as well as the Local Equality Groups set out in Appendix 1 of the draft Statement of Community Involvement and any individuals or organisations who made representations in the previous SCI consultation held in November and December 2019. The consultation was also available at <https://surreyheathplanningpolicy.inconsult.uk/consult.ti/SHBCSCI>.

In summary, the changes made to the Statement of Community Involvement arising from feedback provided during further consultation to take account of amendments in response to Covid-19 are as follows:

- Front cover – Amend title of document to say, “Statement of Community Involvement (SCI) Revised Version including amendments in response to Covid-19 ***or similar health or security challenges that may arise***”
- Page 6, paragraph 1.11 – Amend first sentence as follows: “As the SCI had not yet been adopted the Council took the opportunity to review the SCI in the light of Covid-19 restrictions, ***also having regard to the possibility of similar health or security challenges that may arise.***”
- Page 7, paragraph 1.14 – Amend last sentence as follows: ***“Where social distancing measures and other restrictions relating to Covid-19 are no longer in place, the methods of consultation applied through this SCI will revert to the general requirements in this document, without the need to comply with any additional legislation associated with Covid-19, or similar health or security challenges.”***
- Page 9, Table 1, column 4, row 4 – Add footnote 6 reference to state ***“Where it is deemed possible to do so whilst complying with government guidance and any relevant legislation for social distancing requirements in place at the time of publication.”***

- Page 10, Table 2, column 2, row 2 – Amend footnote 7 to say, “Workshops to be held subject to being able to adhere to Covid-19 legislation and guidance including on social distancing, **or any future legislation and guidance issued for similar health or security challenges that may arise.**”
- Page 11, Table 2, column 2, row 3 – Amend last sentence of footnote 9 to say, “If it cannot be complied with due to government legislation and guidance on Covid-19 and social distancing measures **or any future legislation and guidance issued for similar health or security challenges that may arise**, the Local Plan process will be delayed until the requirement to make documents available can be met.”
- Page 13, Table 3, column 2, row 2 – Amend footnote 13 to say, “If it cannot be complied with due to government legislation and guidance on Covid-19 and social distancing measures **or any future legislation and guidance issued for similar health or security challenges that may arise**, the consultation process will be delayed until this requirement to make documents available can be met.”
- Page 20, paragraph 5.1 – Amend fourth sentence as follows: “Where the process of consulting on and determining planning applications is affected by legislation and guidance relating to Covid-19 **or similar health or security challenges that may arise**, the Council will ensure that those requirements are met which may result in some minor amendments to the process and procedures set out below.”
- Page 23, Table 6, title – Amend footnote 23 to say, “Subject to complying with legislation and guidance relating to Covid-19 **or any future legislation and guidance issued for similar health or security challenges that may arise.**”

Responses to the Draft Statement of Community Involvement (SCI) consultation to take account of amendments in response to Covid-19

Respondent	Comment	Surrey Heath Borough Council’s (SHBC) Response
Environment Agency	Thank you for consulting us on this Statement of Community Involvement. We do not normally comment on these documents, although please do continue to engage with us throughout your local plan process and consult us with your regulation 18 and regulation 19 local plan consultations.	Noted.
Historic England	Thank you for your email of 25 June 2020 inviting comments on the above document. The consultation process detailed in the SCI should be adequate in meeting the requirements of the Local Development Regulations 2004.	Noted.

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>While we take note of the changes to consultation arrangements in response to the current Covid-19 pandemic, and more recent regulation changes by government in relation to electronic notifications, it remains important to ensure that stakeholder organisations with interests and responsibilities in the historic environment, at national and local levels, are fully involved throughout the consultation process. To this end, it is important to consult with both the Council's own conservation officer or team and local amenity societies.</p> <p>In terms of the general requirements of consultation in relation to the historic environment, I attach a Note on Consultation with the Heritage Sector and a list of national amenity bodies.</p> <p><i>Note on consultation with the Heritage Sector</i></p> <p>Under the Town and Country Planning (Local Development) Regulations 2004, Historic England is not specified as an authority that the Council must consult with on the preparation of a draft SCI [Regulation 25 (2)]. However, as a statutory consultation body at other stages in the preparation of Development Plan Documents, as well certain planning applications, we welcome the opportunity to make general comments on the SCI.</p> <p>In view of our remit, some general principles are outlined below which we suggest are reflected in the SCI.</p> <ul style="list-style-type: none"> • Planning and Development in the Historic Environment – A Charter for Historic England Advisory Services (updated, July 	<p>Noted. Local amenity societies, including historic interest groups are included on the Council's Local Plan Database and will be consulted as part of the plan-making process. In addition, for the preparation of conservation and heritage policies, input is sought from the Council's Historic Buildings Officer.</p> <p>Noted. The Council will update its Local Plan Consultation Database to ensure any updated contact details for the national amenity societies listed in Historic England's response to this consultation are included, and will therefore be consulted throughout the plan-making process.</p> <p>Noted. The Council will continue to consult Historic England on any further updates to the SCI.</p> <p>Noted. As part of development management process, regard is had to Schedule 4 of The</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<p>2017): This document, available on our website https://historicengland.org.uk/services-skills/our-planning-services/charter/ sets out Historic England's advisory services for planning and development. It details the circumstances where we must be consulted upon planning applications affecting the historic environment, and the type of information required for consultations with Historic England on proposals affecting nationally important heritage assets. It also underlines the value and importance of pre-application discussions with us on proposals with the potential for major change, or damage, to nationally important heritage assets. The principles set out in this charter should inform the Council's consultation approach to significant planning applications.</p> <ul style="list-style-type: none"> • Consultation address database – It is no longer necessary to send any hard copy correspondence and documents relating to the Local Development Framework / Local Plan / Neighbourhood Development Plans / Supplementary Planning Documents to our London and South East Office. However, if sending consultations in paper form or as a hard disc (CD) the consultation should be sent to the regional office: Historic England London & South East Region, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA. You may remove any other addresses for English Heritage or the Royal Commission on the Historical Monuments of England from your database. 	<p>Town and Country Planning (Development Management Procedure) (England) Order 2015, which sets out the bodies which a local planning authority must consult before granting planning permission for the specified types of development, including Historic England. The purpose of the SCI is to set out what consultation will take place with the community on planning policy documents and planning applications and therefore focuses principally on how community and non-statutory bodies will be consulted. Accordingly, it is most appropriate to have regard to the Planning and Development in the Historic Environment Charter through the determination of relevant planning applications , but not through specific reference in the SCI.</p> <p>Noted. All correspondence with Historic England regarding planning consultations or planning applications is digital and will continue to be sent via email.</p>

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	<ul style="list-style-type: none"> • All electronic consultations, by email, should be sent to the dedicated consultation mailbox: e-seast@historicengland.org.uk. We would ask that consultations are not sent to any other mail addresses or email inboxes (including personal email inbox) as this will result in delays to registration and responses from Historic England. • Sustainability Appraisal - Whilst Historic England is a statutory consultee for Strategic Environmental Assessment, we do not have the capacity to attend SEA/SA workshops. If it is proposed to hold such an event, you should ensure that the council's Conservation Officer and a representative from the County Council's archaeological service is invited to attend to advise on any issues relating to the historic environment. We will, of course, respond to correspondence relating to SEA at the appropriate stages. 	<p>Noted.</p> <p>Noted.</p>
Transport for London	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the changes to the draft SCI.	Noted.
Waverley Borough Council	Thank you for giving Waverley Borough Council the opportunity to comment on the above consultation. We have concluded that we do not wish to comment on any specific issues. However we look forward to hearing from you regarding future consultations.	Noted.
Ms J Warren	Section 5.1 I feel that this amendment should include an addition to the final sentence which says that when there are significant changes, interested parties will be notified that there are changes and where to find out about them. Suggested wording - "Any significant changes will be highlighted on the Council's website and any	Noted. Notifying of amendments to planning processes or procedures through the Council's website will enable consistency in the level of information provided to all members of the public about these changes. The existing approach of highlighting this

Respondent	Comment	Surrey Heath Borough Council's (SHBC) Response
	interested parties will be notified that there are changes to the process and where to find out about them.	information on the Council's website therefore takes best account of equal access to information for people who live or work in Surrey Heath.
Mr G O'Connell	I generally support the proposed changes - they seem sensible and practical. I have no comments on specific items and only two general comments. It might be useful to not purely refer to COVID-19 and to add ""or similar health or security challenges in the future"" and to follow ""Government guidance and best practices current at the time.	Noted. Amend wording in SCI document where reference to Covid-19 has been made to state, "...or any future legislation and guidance issued for similar health or security challenges that may arise".

This page is intentionally left blank

Planning for the Future White Paper

Summary

The Ministry of Housing, Communities and Local Government (MHCLG) is consulting on radical reforms to the planning system in a Planning for the Future White Paper.

In summary the changes are proposed to:

- Give the Council a binding housing target;
- Divide the Borough into areas of Growth, Renewal and Protection;
- Simplify and streamline the development management process giving greater automatic permissions in principle and permitted development rights;
- Continue to protect the Green Belt;
- Streamline and shorten the Local Plan process, putting generic development management policies in national planning policy so that local plans focus on site specific matters;
- Place greater focus on getting site specific matters resolved in local plans with faster more limited planning application requirements;
- Give greater priority to design and require the production of design guidance and design codes;
- Replace S106 agreements and the Community Infrastructure Levy with a new Infrastructure Levy;
- Digitise the planning process.

Whilst views are sought on the broad principles of the changes proposed, as outlined above, the White Paper contains little detail on many of the proposals. This report outlines the key issues arising from the proposals and sets out a detailed response at Appendix 1.

The changes are subject to a 12 week consultation period ending on 29th October. Many of the proposals will require primary and secondary legislation.

Portfolio: Planning and People

Date Portfolio Holder signed off report: 29.09.20

Wards Affected: All

Recommendation

The Executive is asked to RESOLVE that

- (i) the content of the Governments Planning for the Future White Paper and of this report be noted;
- (ii) the detailed response to the consultation questions, as set out at Appendix 1, be agreed and submitted as the Council's consultation response;
- (iii) authority be delegated to the Executive Head of Regulatory Services in consultation with the Portfolio Holder for Planning & People to agree any substantive changes to the response arising out of further information from Government; and
- (iv) responses to subsequent planning consultations issued up to the end of March 2021 relating to proposals set out in the White Paper be delegated to the Executive Head of Regulatory Services in consultation with the Portfolio Holder for Planning and People.

1. Key issues

- 1.1 The White Paper proposes to radically reform the current English Planning system to make it a '*significantly simpler, faster and more predictable system*'. It states that there is little incentive for high quality design and the current system does not build enough homes. The Paper focuses on high level change with the detail of the proposals to come later. If progressed there would be a new Planning Act and an amended National Planning Policy Framework to deliver it.
- 1.2 The proposals are far reaching and coupled with other recent changes and proposed changes, summarised below, would, if implemented, result in significant changes to planning policy and to development management as well as to the funding and provision of affordable housing and infrastructure. The White Paper proposals are spilt into three broad categories:

Planning for development

- Local Plans would be simplified to focus on site specific and place making matters setting 'rules' for acceptable development;
- Introduce a statutory 30 month timetable for preparing Local Plans;
- A binding housing requirement would be set for each Local Authority with local plans covering a 10 year period;
- Local Authorities would identify all land within one of three categories:
 - Growth areas – areas of 'substantial' growth which would be granted outline permission on adoption of the Plan leaving only technical details to be determined.
 - Renewal areas – a presumption in favour of development in these areas for uses identified in Local Plans.

- Protected areas – areas where development is restricted and would require a full planning application.
- Development Management would become more digitised and streamlined with more standardised templates and limits on the requirements for applicants to submit supporting information.
- There would be an increase in automatic consents and permitted development.

Planning for Beautiful and Sustainable Places

- A greater statutory emphasis on design with design codes to be published as part of or alongside Local Plans. These will only have weight if prepared with community input;
- All local authorities to appoint a chief officer for design and placemaking;
- Additional permitted development rights proposed for certain types of replicable development that conform with a design 'pattern book'.

Planning for Infrastructure and Connected Places

- The developer contributions process through Section 106 and the Community Infrastructure Levy to be replaced with a single Infrastructure Levy (IL) to be set nationally but collected and spent locally;
- The new Levy would be based on the final value of the scheme and paid on occupation;
- There would be greater flexibility on spending of the Levy including on Council Services;
- A proportion of the Levy would still be passed to neighbourhoods;
- The Levy could be used to fund affordable housing and local authorities could borrow against it.

1.3 The key changes and implications for Surrey Heath are set out below. Appendix 1 sets out draft responses to the White Paper consultation questions. The White Paper does not set out a lot of detail on each of the proposed reforms and more detailed responses may need to be made when further consultations come forward.

1.4 A general overarching comment made in the attached response is that one of the consequences of the White Paper proposals would be a detrimental impact on local democracy and decision making, through for example the increased use of permissions in principle and of permitted development rights and through the use of 'rules' rather than policies in Local Plans.

Local Plans

1.5 The proposals in the White Paper would retain a plan led system but seek to simplify Local Plans and the Local Plan process to give more certainty to both developers and the local community and to speed up decision making. Greater emphasis is proposed on reaching those groups that do not normally engage through greater digital engagement, whilst streamlining the

opportunity for consultation at the planning application stage. The Local Plan proposals include:

- Local Plans to identify land under one of three categories:
 - Growth areas – sites for ‘substantial’ development and which would automatically secure outline consent on the adoption of the Local Plan;
 - Renewal areas – suitable for some development such as town centres, land within settlements and where there would be a presumption in favour of development; and
 - Protected areas – areas where development is restricted such as Conservation Areas and the Green Belt and where a planning application would be required. No change is proposed to Green Belt Policy.
- Local plans to focus on site and area specific requirements and locally produced design guides and codes;
- A radical re-invented engagement process with local communities so that more democracy takes place at the plan making stage;
- The current tests of soundness are to be replaced with a single ‘sustainable development’ test and requirements for local plan evidence are to be reduced and standardised;
- The duty to co-operate is to be abolished and views are sought on the best way to undertake strategic planning;
- Local Plans are to be prepared within a statutory 30 month timetable (or quicker) with set timescales for each stage with Plans covering a minimum period of 10 years;
- Local plans are to comprise an interactive web based map with a key and supporting text.

1.6 Significantly, Local Authorities would also be subject to a new binding housing target. The proposed revised standard methodology for assessing housing need is the subject of a separate consultation previously reported to Executive. Those proposals would increase the annual housing need figure in Surrey Heath from 332 to 408 dwellings per annum. The White Paper makes clear that in order to set a new binding housing target the Government would also take into account land constraints, including the Green Belt, within each area. The White Paper does not include any detail as to how or when this will be done. The White Paper also proposes to remove the Five Year Housing land supply requirement as the proposed new approach would ensure sufficient land comes forward.

1.7 Neighbourhood plans are to be retained but views are sought on whether their content should become more focused to reflect the proposals for Local Plans.

Implications for Surrey Heath

1.8 The proposed response at Appendix 1 sets out general support for streamlining the Local Plan process, including for example reducing the burden of evidence required to support Local Plans and simplifying the tests of soundness. However little detail is available on many of the proposals outlined in the White Paper and the Council therefore reserves the right to make further comments. For example, in principle no objection is raised to

generic development management policies being set out in national policy so long as there is still the opportunity for Local Authorities to include detail on very local issues such as housing type and mix within their own Local Plans. A number of significant concerns are raised in the response including:

- **Housing Requirements** – the Council has already raised objection to the proposed new standard methodology. The White Paper identifies that land constraints would be applied to the standard methodology to produce a final binding target. The response questions how this will be done, what weight will be given to constraints and suggests that local authorities are best placed to identify what these constraints are.
- **Local Plan timetable** – the White Paper proposes that Local Plans are produced within 30 months of which 12 months is the Examination and adoption process. The response suggests that this would be too challenging, particularly with the new requirements for design codes and the need for assessment of development expected in Growth areas.
- **Identification of Areas** – the proposals would require the borough to be split into areas of either Growth, Renewal or Protection. Areas of Protection would include Conservation Areas, Green Belt, Countryside beyond the Green Belt and areas of flood risk. Growth areas would comprise any ‘substantial’ areas of future development and is to be further explained in future planning guidance. Such areas are proposed to have an automatic outline consent when allocated in an adopted plan. Renewal areas would be the remainder of the borough. The proposals suggest that in renewal areas there would be a statutory presumption in favour of development being granted for uses specified as being suitable in each area. This suggests that there will need to be clear definitions of potentially relatively small areas with the Local Plan setting out the uses that are appropriate within each area.

Development Management

1.9 The White Paper proposals seek to provide more certainty in the planning application process and to speed up decision making. Some of these changes arise from proposals set out elsewhere in this report such as the automatic granting of outline consent on sites identified in Local Plans as ‘growth areas’ and introducing a fast track process for certain applications meeting local design criteria. Other proposals affecting development management include:

- A more streamlined, digitally enabled process including automated and standardised routine processes;
- Firmer timescales for determination of applications (with penalties proposed such as the return of application fee);
- The possible return of application fees if appeals are successful;
- Increased delegation to officers where the principle of development is agreed (for example in Renewal areas);
- Proposed new faster application process in Growth areas and Renewal areas;
- More emphasis to be given on the enforcement of planning standards and decisions.

Implications for Surrey Heath

- 1.10 The response at Appendix 1 supports the reduction in burdens on early administration of applications and standardisation of aspects of the process subject to appropriate tools and resources being provided to local authorities. However, the response suggests that the proposed measures will reduce democratic accountability and influence and limit professional planning judgement through more streamlined and automated processes and greater delegation.
- 1.11 The proposed response raises concerns at the suggestion of returning application fees if applications are not determined in time as there are many reasons why applications are not determined within a specified timescale.

Design and sustainability

- 1.12 The White Paper places significant focus on beautiful design and proposes:
- New development to be beautiful creating a 'net gain' not just 'no net harm' with all new streets to be tree-lined;
 - To facilitate improvements in energy efficiency standards for new buildings;
 - To introduce fast track permissions to automatically permit high quality proposals where they meet certain design criteria;
 - To review and update the planning framework for listed buildings and conservation areas;
 - That design codes will be prepared as part of or alongside local (and neighbourhood) plans. These will only have weight where there has been genuine local involvement; and
 - That each local authority appoints a chief officer for design and place-making.

Implications for Surrey Heath

- 1.13 The proposed response supports greater weight being given to good design and in principle supports the preparation of design guidance and design codes. Support is also given for simplifying the environmental impact assessment process and for improvements in environmental quality, subject to seeing further detail.
- 1.14 However the response also highlights the skills and resources that would be needed to prepare and implement design codes across the borough and raises concerns about the use of additional permitted development rights where design parameters are met, particularly the suggested use of 'pattern books' as this limits the ability to take into account local character and reduces local engagement in the planning process.

Infrastructure delivery

- 1.15 In relation to infrastructure delivery the White Paper seeks to simplify the developer contribution process and reduce the opportunity for negotiations that would delay the planning process. It proposes that:
- Section 106 and the Community Infrastructure Levy (CIL) be replaced by a single Infrastructure Levy (IL);
 - The IL would be set nationally and based on the final value of the scheme. It would be payable on occupation and collected and spent locally;
 - There would be greater flexibility on the spending of the IL but a proportion would still go to local communities and a proportion should help fund planning services;
 - Funds raised through the levy could be used to secure affordable housing;
 - The IL would raise more than current contributions and would also apply to development delivered through changes of use and permitted development.

Implications for Surrey Heath

- 1.16 The proposed response supports in principle the simplification of the developer contribution process and the intention to capture at least as much value as the current system. However, some concerns are raised at the loss of S106 agreements as these secure more than just financial contributions including affordable housing tenure and delivery, sustainable travel measures, long term open space maintenance and land transfers. The response also raises the issue of funding SANG and the need to ensure that that can still be secured such that it does not take a significant proportion of the new Levy.
- 1.17 The consultation raises a number of detailed implementation questions which remain unanswered at this time such as the timing of the Levy payment on large, phased schemes, how infrastructure that is provided on site by the developer would be considered against the levy and whether it applies to all types of development. The impacts on the delivery of Affordable Homes through the new Levy is also unclear.

Summary

- 1.18 The Planning for the Future White Paper proposes fundamental changes and the Council supports a review to simplify and speed up the Local Plan, development management and developer contribution processes. A significant number of changes are in principle to be welcomed, such as the focus on securing good design, however, the majority of changes proposed require further detail to fully assess the impacts. The Council also supports the objective to engage with a wider proportion of the population in the planning process, and to provide greater certainty to developers and local communities. It welcomes the recognition that planning services are under resourced and future investment in planning skills and technology.

- 1.19 The White Paper sets out a number of proposed changes of particular concern, as highlighted in this report and detailed in the Council's response at Appendix 1. Overall two key concerns are highlighted:
- **Public involvement** – despite references in the White Paper to increasing community involvement the Council considers that the proposals may actually deliver fewer opportunities for the community to have a say on the type and location of development in their area through an increase in permitted development rights and in a more streamlined local plan system.
 - **Local democracy** – the proposals further limit the ability for local influence over place making in the borough through the imposition of binding top down housing targets, an increase in permitted development rights and other more streamlined application processes along with the creation of 'rules' rather than policies.

Next Steps

- 1.20 The proposed reforms would require primary and secondary legislation to bring into force. It is anticipated that over the next few months the Government will publish a number of consultations on different aspects of the planning reforms. It is suggested that the Council's response to these consultations be delegated to the Head of Regulatory Services in consultation with the Portfolio Holder for Planning and People.

2. Resource Implications

- 2.1 If the proposals in the White Paper are introduced as proposed then there may be resource implications for the Council in moving to the new system. These resources would include staff and skills as well as software and IT with the proposals for greater digitisation of planning. The proposals also include the requirement for all Councils to have a Chief Officer for Design and Place Making. The replacement of S106 and CIL with a new Levy is also likely to have financial implications. Until the outcome of the consultation and more detail about individual proposals is known it is not possible to quantify what these implications will be.

3. Options

- 3.1 The Options for the Executive to consider are:

4. Proposals

- 4.1 It is proposed that Members agree to submit the response set out in Appendix 1 as Surrey Heath's formal response to the Planning for the Future White Paper consultation.

5. Supporting Information

- 5.1 The document forming the consultation can be viewed at <https://www.gov.uk/government/consultations/planning-for-the-future>

6. Corporate Objectives And Key Priorities

- 6.1 The proposals have some impact on the Council's ability to balance housing need with protection of the environment in the light of the Borough's development constraints.

7. Policy Framework

- 7.1 The Governments Planning White Paper consultation is a national consultation whose proposals apply to all local authorities within England.

8. Legal Issues

- 8.1 The implementation of the proposed changes will have impacts on the determination of planning applications and on the production of the Draft Local Plan.

9. Human Rights

- 9.1 No issues identified.

10. Consultation

- 10.1 This Report is a response to a consultation and has not required any consultation to take place by the Borough Council.

11. Officer Comments

- 11.1 No further comments.

Annexes	Appendix 1: Response to the Planning for the Future White Paper consultation
Background Papers	None
Author/Contact Details	Jane Reeves and Katie Bailey Jane.reeves@surreyheath.gov.uk Katie.bailey@surreyheath.gov.uk
Head of Service	Jenny Rickard - Executive Head of Regulatory Services

This page is intentionally left blank

Appendix 1 - Surrey Heath Borough Council Response to Planning for the Future: White Paper

This response is prepared within the following local context. Surrey Heath Borough 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. The western half of the Borough is mainly urban in character. Nearly half of the Borough is designated as Green Belt and all residential development in the Borough is affected by the Habitat Regulations due to the proximity of the Thames Basin Heaths Special Protection Area.

The Council has prepared a significant evidence base to inform an emerging Local Plan (Regulation 18 consultation due in 2021) based on the current standard methodology. Meeting the current housing figure of 332 per annum is in itself proving a challenge having regard to the constraints identified above. The Hart Local Plan Examination Inspector recognised those constraints and identified that Hart could deliver 731 dwellings from unmet need within Surrey Heath over the Hart Plan period. This is reflected in the Hart Local Plan adopted in April this year.

General Comments

In addition to responding to the questions below the Council would make the following comments:

The Council supports a review of the planning system to simplify and speed up the Local Plan, development management and developer contribution processes. It would also support ways to reach and engage a wider proportion of the population in the planning process, and to provide greater certainty to developers and the local communities. It supports the recognition that planning services are under resourced and future investment in planning skills and technology.

Public involvement – despite references in the White Paper to increasing community involvement the Council considers that the proposals may actually deliver fewer opportunities for the community to have a say on the type and location of development in their area through an increase in permissions in principle, increases in permitted development rights and in a more streamlined local plan system.

Local democracy – the proposals further limit the ability for local influence over place making in the borough through the imposition of binding top down housing targets, an increase in permitted development rights and other more streamlined application processes along with the creation of ‘rules’ rather than policies.

In many instances there is little detail of the proposed changes upon which to comment and the comments in this response are therefore based on the information available. Once further detail is published the Council may take a different view on a particular proposal.

Questions and SHBC responses

Pillar One – Planning for Development

1. What three words do you associate most with the planning system in England?

SHBC Response – *Deliver sustainable development*

2. Do you get involved with planning decisions in your local area?

2(a). If no, why not?

SHBC Response – *As Local Planning Authority the Borough Council has responsibility for producing the Local Plan, determining planning applications and related planning matters.*

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

SHBC Response – *The Council would support a wider use of digital media provided that local authorities are properly resourced to deliver this. The Council has some concerns about the impact of the proposals on community involvement in planning decisions as set out later in this response. A move to digitising all aspects of the planning system should not be at the exclusion of other mechanisms to reach those without the ability to access or understand digital information.*

4. What are your top three priorities for planning in your local area?

SHBC Response – *The planning priorities for the borough are:*

- *Providing high quality housing that is financially accessible to local people;*
- *Delivering a sustainable environment with a focus on protecting and enhancing biodiversity and providing climate change mitigation and adaptation; and*
- *Protecting and future proofing our economic base including the borough's established employment areas and the regeneration of Camberley town centre.*

5. Do you agree that Local Plans should be simplified in line with our proposals?

SHBC Response – *In principle the Council does not object to the identification of land as Growth, Renewal and Protected Areas. However, we consider that simply having three areas might be too simplistic, particularly for Renewal areas as there are many different land uses and circumstances that exist. Some Renewal areas will contain a mix of uses, some of which might also fall within Protected Areas such as important green space or lie within Conservation Areas. It is not clear how these*

circumstances will be reconciled. Similarly, very large areas of growth are likely to contain Protected Areas (such as areas of flooding) within them. The use of three Areas makes it difficult to accommodate the range of circumstances that might arise.

In order to ensure that development of an appropriate type and scale takes place within Renewal Areas the Council envisages that the settlement areas would need to be sub divided into many smaller parts to ensure that appropriate design and land use parameters can be established through the Local Plan and considered when any enhanced presumption in favour of development is implemented.

For example, Surrey Heath has a wide range of different characters within its eleven settlements, and these can vary over small areas. A mechanism is therefore required to ensure these character differences can be taken account in planning for places categorised as Renewal Areas.

The need to identify and map sub areas, for example if the Council were to identify residential gardens as Protected Areas would be time consuming and technically challenging. The Council would suggest that one way of dealing with residential gardens would be to have a national development management policy on this issue.

With regards to Protected Areas the Council has the following assets in the borough that it considers should fall within this category:

- *Metropolitan Green Belt*
- *Countryside Beyond the Green Belt*
- *Conservation Areas*
- *Historic Parks*
- *SPA, SAC and SSSI*
- *Sites of Nature Conservation Importance*
- *Areas of Local Greenspace*
- *Areas of High Archaeological Potential*
- *Scheduled Ancient Monuments*

The Council would support planning applications being required in Protected Areas. However, the White Paper proposes that all applications in Protected Areas will be considered against the National Planning Policy Framework. The Council would agree that for some Protected Areas such as the Green Belt there would be benefit in having a consistent policy approach but would want to see further detail on how policies/rules on other protected areas such as Conservation Areas and Local Green Spaces are to be drafted before being able to support this approach. Such areas can have very locally specific characteristics, defined for example through Conservation Area Appraisals and Management Plans and the Council would want to see the ability to take into account local character and circumstances retained.

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

SHBC Response – *The Council would support a set of national development management policies so long as local authorities can still reflect any very local issues within Local Plans and ensure that planning decisions can be influenced by local circumstances for example the mix and tenure of housing including requirements for affordable housing. Some flexibility is therefore needed. The use of ‘rules’ rather than policies suggests that any planning judgement or flexibility is removed from the process. Every development proposal has its own unique characteristics depending on local needs, the proposed use, local character and community aspirations. Some flexibility to allow for individual circumstances should remain in the planning process.*

7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

SHBC Response – *Yes - the Council would in principle support the replacement of existing policy and legal tests with a sustainable development test, subject to being able to comment on the detail of that test. There would need to be clarity over the definition of sustainable development to avoid ambiguity at Examination.*

The Council would support a simplification of the sustainable development assessment process including the need for Sustainability Appraisal and the Environmental Impact Assessment process. It is noted that one of the Basic Conditions that must be met by neighbourhood plans is that the plan contributes to sustainable development and a review of how this has worked could inform a Local Plan sustainability test along with other relevant measures such as consistency with the NPPF which should as a consequence ensure the delivery of sustainable development.

Any simplification of the environmental assessment process should still be sufficiently robust to ensure that environmental factors are robustly assessed and protected.

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

SHBC Response – *The Council would support the abolition of the Duty to Co-operate as it is set out at present as there remains uncertainty over whether the Duty is met with Planning Inspectors taking different views, and the process of demonstrating co-operation being time consuming and document based. However, clearly there are strategic planning matters that cross boundaries, particularly relating to infrastructure and it is disappointing that there is not greater recognition of this in the White Paper. For example, Surrey Heath contains a stretch of the M3 and is also home to Frimley Park Hospital, both of which are impacted by development in the Borough and neighbouring authorities. In addition, there are infrastructure requirements needed to support development upon which the Council has little control over the delivery and use of, such as electricity, gas and water. Furthermore, Surrey Heath is one of the eleven local authorities that are within 5km of the Thames Basin Heaths Special Protection Area, for which partnership working through the Joint Strategic Partnership Board has been essential to consistently delivering*

strategic mitigation for new housing in the region. These matters need to be considered at a wider than local level.

It is noted that in respect of housing, the White Paper does allow for authorities to voluntarily agree an alternative distribution of their requirement through joint planning arrangements. As set out in the introduction to this response the constraints within the borough mean that it is difficult to deliver the current housing requirement. The Council has worked closely with its Housing Market Area Partners through officer and Member Working Groups with an agreement in the Hart Local Plan adopted this year that Hart would accommodate 731 dwellings from unmet need in Surrey Heath.

The Council considers that there is a need for some formalised strategic planning process whereby strategic matters including housing and infrastructure can be discussed and if necessary delivered. A suggestion is either a more streamlined version of the current duty with greater clarity as to how this can be demonstrated, or through alternative mechanisms such as Strategic Infrastructure Boards, or use of LEPs.

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

SHBC Response – *The Council considers that the Government has not taken the opportunity to take an holistic view of a number of influencing factors as to how a national strategy for growth might look and has raised concerns about the proposed new standard methodology set out in the ‘Changes to the Planning System’ consultation. Factors such as the long term implications of Covid-19 and whether some areas have largely reached capacity for significant levels of additional housing having regard to available infrastructure and environmental constraints have had no recognition in informing the future spatial distribution of housing. Instead the use of a mathematical calculation takes no account of proper planning issues, nor of potential long-term implications of Covid-19 and how people will choose to work and the impact of this on where they live. For example, the long term impact of Covid-19 on the centre of cities and major urban areas could be considerable as the demand for office space falls and people become more flexible as to where they locate, with a need to re-think the opportunities for other uses such as housing. The proposed methodology does not seem to take account of those authorities that have growth aspirations or any links to where economic growth is, or should be taking place, or of major infrastructure which could support growth.*

None of these issues have been factored into the consideration of how and where future growth might take place. Where significantly higher figures have been derived for local authority areas, there is also concern that this could push development to the unsustainable locations, such as car dependent rural areas, without existing infrastructure.

In respect of the inputs to the standard method, the Council would support the use of a mid-point between the growth derived from the household projections and 0.5% of existing housing stock data. It is considered that this could be a more robust approach to identifying housing growth in an area due to its ability to take into

account both datasets, and ensures the household projections still play a role in the identification of local housing need figures.

Whilst the Council would support the use of constraints in determining a final number if this is the route that is chosen, this does not rectify the fact that the currently proposed methodology would more or less replicate what has already happened without considering whether this is the right approach.

The White Paper does not make it clear how a standard methodology would be adjusted to take into account land constraints and whether local authorities would have an input into this or whether this process will be undertaken by Government. Local councils are best placed to know the extent of local constraints and the availability of land that would enable new homes to be built. This point is illustrated by the fact that approximately 81% of Surrey Heath is within the Green Belt, Countryside Beyond the Green Belt and/or the Thames Basin Heaths and its 400m exclusion zone. The Thames Basin Heath Special Protection Area alone accounts for 23% of the Boroughs 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 Heaths SPA). These constraints significantly impact upon the Council's ability to sustainability accommodate future development.

In addition, there are areas of local wildlife importance, Conservation Areas and an Historic park and areas of important local greenspace. All net new dwellings must provide mitigation to ensure no likely effect on the Thames Basin Heaths SPA in the form of provision of or contributions to, Suitable Alternative Natural Greenspace (SANG). Opportunities for new SANG in the borough are limited providing a constraint on development. It is unclear how the Government would have the detailed knowledge to factor in all these constraints to a standard methodology to provide a binding figure which could be deliverable.

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

SHBC Response – No - *The Council has raised concerns about the use of both of these indicators in its response to the 'Changes to the Planning System' consultation. The Council would question whether simply increasing the number of homes being built in a local area would have any significant impact on affordability as delivery is only one factor in determining house prices. Other factors such as the type of housing product/tenure also influence price. Furthermore, developers constraining the market through restricting or controlling rates of housing delivery, and land banking can impact local house prices, and is not something that plan-making authorities are able to address. The Council notes that it is not the case in Surrey Heath that the planning process is delaying the delivery of new homes. For example, in the period 01/04/2017 – 31/03/2018, the Council permitted 670 net new dwellings, whilst only 224 completed in the same period.*

The extent of existing urban areas as a factor just replicates previous patterns of development without any consideration of the factors set out in the response to Question 8a.

9(a). Do you agree that there should be automatic outline permission for areas for substantial development (*Growth* areas) with faster routes for detailed consent?

SHBC Response – *No, the Council does not agree that Growth areas should have automatic outline permission. The faster Local Plan process means that it would be very challenging to deliver a scheme with all elements required for an outline application resolved to a satisfactory extent. The need for an outline permission level of detail would add cost and time. The proposals for public engagement are limited and give little opportunity for communities to have a proper input into the details of a scheme in the time available. The Council has concerns as to how some evidence that would be required, such as ecological surveys, could be robustly demonstrated in the time available. In addition, the time and ability for local authorities to have sufficient evidence to compare alternative site and strategy options if large sites have to be developed to an outline level of detail would be heavily constrained.*

Whilst responsibility could (and should) lie with the developers to provide early and robust evidence and masterplanning, the Council questions whether some would commit to this if there is no certainty of the site's inclusion. In addition, this still does not allow time for communities to have much say on the masterplanning or site selection process. It is noted that the Government has not yet determined how the community would be involved in the agreement to the proposed faster, final stages of the planning process. As set out in the introduction to this response the Council is concerned that other than involvement in design codes the White Paper proposals will limit opportunities for meaningful local engagement in site choice and detail.

The Council would therefore suggest that Growth areas should have a strong presumption in favour with a more streamlined application process to follow.

9(b). Do you agree with our proposals above for the consent arrangements for *Renewal* and *Protected* areas?

SHBC Response – *The Council would comment as follows:*

Renewal Areas – *The Council supports a plan led approach to development in these areas. However, the Council is concerned that the consent routes give greater priority to design over other matters (see comments under Pillar Two) and by increasing the range of automatic consents this further reduces local engagement and decision making in place making. The Council would support the opportunity for faster planning application processes subject to appropriate opportunities for local engagement and for local decision making.*

Protected Areas – *The Council would support applications being required in Protected Areas subject to the comments set out in Question 5.*

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

SHBC Response – *No, the determination of such significant planning projects which would impact on local communities should be considered through the local planning system with local democratic decision making. The Councils experience of the NSIP regime (London to Southampton pipeline) is that it requires a significant amount of staff resources (without any fee income), can be a prolonged process and provides limited opportunity for effective community engagement. New settlements should absolutely not bypass the local plan system. The Council also suggests that if this route is introduced there is the potential for the Secretary of State to be overwhelmed by proposals.*

If this route is implemented the Council considers that it should only be applicable to extremely large developments, for example those that have a nationally significant size threshold of at least 1% of the target for new homes nationally (circa 30,000 homes).

10. Do you agree with our proposals to make decision-making faster and more certain?

SHBC Response – Yes - *In principle but the Council would comment on the following detail that is available:*

The Council would support a more digitised process that ensures appropriate information is submitted with planning applications although would suggest that there would still need to be some human assessment as to whether the information submitted was robust and met relevant criteria, i.e. it could not just be a tick box exercise.

The proposals would require significant investment in skills and software which the Council would welcome but it is not clear how and when this would be funded.

The Council would support a more standardised approach to supporting technical information that is agreed with the statutory agencies and to other matters such as site notices.

Increased delegation of planning decisions to planning officers – the Council considers that the schemes of delegation should be determined by each local authority. Local Councillors have an important role in reflecting the views of the local community and should have the opportunity to determine the detail of applications in certain instances to be agreed at the local level.

Determination of applications – there are many reasons why an application might not be determined in time and which may not be in the control of the local authority such as amendments by the applicant, delays in statutory consultee comments etc. The Council would object to the proposals for application fees to be returned, or for applications to automatically be deemed to have been granted planning permission if not determined in time. This is likely to lead to rushed decisions, and possible

increase in refusals in order to avoid such measures. Moreover, this could be exacerbated in the context of planning services currently being under resourced.

11. Do you agree with our proposals for accessible, web-based Local Plans?

SHBC Response – Yes, *in principle the Council supports the delivery of web based Local Plans subject to resources and software being made available to local authorities to deliver this. However, this should not be at the expense of the content of Local Plans being available in other formats to those hard to reach or less technologically able groups.*

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?

SHBC Response – No – *The Council would support a simplification of the Local Plan system including the streamlining of the evidence base and the tests of soundness. However, the proposed 30 month timetable would be challenging having regard to the requirements for Local Plans set out in the White Paper.*

If Examinations and adoption are to take about a year of the process then this only leaves the local authority 18 months to call for sites, engage communities, have sufficient evidence to compare alternatives and draft the plan – this is particularly challenging if growth areas are to be identified and the need to develop an outline level of detail and masterplan. The need for front loading of site detail for growth areas such that they are equivalent to obtaining outline planning permission, the identification of sub areas and appropriate policy parameters, the preparation of design codes/guides and for new ways of community engagement all require software, resources and skills that may not currently exist.

In particular, the Council highlights the timescale impacts of the need to upskill local authority staff in urban design and to develop and install new computer software to provide more digital access to the planning system.

The White Paper suggests that the Inspectors Report would be binding which would suggest that there would be no need for the publication of modifications. It also proposes very streamlined evidence to be submitted to the Inspector. The Council would suggest that if this timetable is to be retained, then this element of the process could be shortened to allow more time for plan preparation. It would also suggest that an extended timetable be allowed if growth areas are to be included.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

SHBC Response – Yes, *the Council would support the retention of neighbourhood plans although there is little detail in the White Paper as to how their role would ultimately fit into the revised planning system and could shape their local communities. Having regard to the proposals to remove development management policies from local plans and for local plans to focus on allocating sites it is unclear what role will remain other than very local design guidance. If this is the case then whilst this will allow local communities to influence what development looks like, it*

would remove the ability for them to have a greater influence over the type and location of development in their communities and on any locally specific issues in development management policies.

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

SHBC Response – *Many town and parish councils would need significant resourcing to be able to hold and manage digital tools and to be able to develop very local design guidance and codes. Support could include expansion of the technical and funding support available to local communities preparing neighbourhood plans and provision of appropriate software and templates.*

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?

SHBC Response – Yes whilst this is not a significant issue in the Borough the Council would support measures to ensure that planning permissions are built out. Measures might include shorter timescales for the life of planning consents, statutory timescales within which to submit detailed applications following an outline consent or a statutory timescale for delivery to be agreed at the grant of permission with penalties if this is not met.

Pillar Two - Planning for Beautiful and Sustainable Places

15. What do you think about the design of new development that has happened recently in your area?

SHBC Response – *The Council currently funds a part time urban design resource to provide input into the planning application and local plan process. However, the expansion of permitted development rights has reduced the ability of the Council to influence the design of many developments and in particular changes of use of existing buildings have given rise to poor quality living environments. Piecemeal development in parts of the borough have also taken place which collectively do not provide a cohesive character. This includes office to residential conversions that have taken place in the borough, which do not meet the nationally described space standards, have no associated infrastructure provision, and in some cases, include rooms that do not have windows.*

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

SHBC Response – *Sustainability comprises social, economic and environmental matters and the Council seeks to ensure a balance between these issues in determining planning applications and preparing local plans.*

To ensure that sustainable development is delivered, measures need to be in place to ensure that development does not come forward in a piecemeal manner. Furthermore, the Council considers that greater emphasis should be placed on health and wellbeing in relation to sustainable development, especially in light of the Covid-19 pandemic.

17. Do you agree with our proposals for improving the production and use of design guides and codes?

SHBC Response – *Yes, in principle the Council would support the increased use of design guides and codes and of these having significant weight in decision making.*

The preparation of robust design codes for different areas of the borough will require significant specialist input and extensive community engagement. The White Paper suggests that design should be ‘provably popular locally’ and that they should consider ‘empirical evidence of what is popular’. This evidence will have time and cost implications to collate, particularly to engage with those hard to reach groups, and links to the Council’s concerns about the timescales for preparing Local Plans within 30 months as set out in Question 12.

The recent Use Class Changes and expansion of Permitted Development Rights that came into effect on 1st September 2020 will make the government’s ambition to provide ‘provably popular design’ more challenging to achieve, unless some restrictions are put in place. If these are not implemented, it is likely there could be significant disparity between development granted planning permission and ‘permitted development’.

In order to avoid later discussions it would be helpful for Government to clearly set out what comprises sufficient community engagement and feedback to satisfy this test.

The Council has experience of implementing Design Codes at the development of Princess Royal Barracks at Deepcut. However, one of the main issues with the design coding process on that site is that it was delivered by the applicant who essentially replicated the same design codes across every area within the site. The Council’s experience suggests that significant resource input is required to secure the development of detailed design codes which effectively respond to the site characteristics. The Council would welcome through the proposed Resources and Skills Strategy for the planning sector the delivery of substantial resources to enable the production of design codes.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

SHBC Response – Yes - *the Council would support the Government providing resources for local authorities to appoint Chief officers for design and place making. In principle a new design body is supported if this would support local authorities in preparing design guidance although it is not clear from the consultation what the relationship between local authorities and a new design body would be.*

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

SHBC Response – Yes - *the Council would support design being given greater emphasis in the work of Homes England.*

20. Do you agree with our proposals for implementing a fast-track for beauty?

SHBC Response – No – *the Council supports a greater emphasis on design and the development of design guidance and design codes and for them to be given significant weight in the planning system. It also supports the development of masterplans for large sites.*

The Council has concerns about the extension of permitted development rights (PDR) for some forms of residential development provided they meet pattern book design standards. Even within residential settings there are so many factors that would influence whether a development is acceptable the Council considers that this might actually perpetuate poor quality design across a wider area by replicating standard ‘templates’ that may not always be appropriate. This approach also places design above other land use factors, and again removes the ability for local residents to be engaged in development in their area. Such an approach also potentially stifles innovative design.

Furthermore, permitted development rights create challenges in the Council's role of creating good quality, healthy places that promote wellbeing as bypassing planning regulations giving rise to concern that the health and wellbeing of occupants will not be prioritised. Previous permitted development has been shown to exacerbate deprivation, particularly for the most vulnerable in society. This is exemplified in the 2020 study by UCL that highlighted London flat developed through PDR contained floor space as low as 15 square meters and as few as 30% of PDR units met the suggested national space standards (37 square meters) compared to 94% of units delivered through full planning permissions. Flats have also been created with no external windows and therefore no natural light or ventilation. As a result, the Council is concerned that extending PDRs results in poor space standards and fails to prioritise health and wellbeing.

Pillar Three - Planning for Infrastructure and Connected Places

21. When new development happens in your area, what is your priority for what comes with it?

SHBC Response – *The Council will seek policy compliant developments that provide a range of infrastructure relevant to the nature of the development and to the location. Depending on the scale of the development this will include the provision of*

affordable housing, highway improvements, the provision and maintenance of green infrastructure and education and community enhancement or provision.

22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

SHBC Response – Yes – the Council would in principle support a simplification of the developer contributions system. See comments to 22b below.

However, S106 agreements have a much wider role than seeking funding for infrastructure and it is not clear from the White Paper how other elements of this process would be delivered. For example the S106 on a scheme for 1200 homes in the borough also sought to secure:

- *The deliver and tenure of affordable housing in perpetuity*
- *The phasing of infrastructure*
- *Open space maintenance and transfer*
- *Travel plans and monitoring*
- *SPA mitigation measures, and phasing.*

The Council would therefore support a simplified Levy for contributions but with a retained S106 or similar, process to secure other measures that make development acceptable.

22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

SHBC Response – The Council considers that the rate should be set locally or on an area specific basis. The White Paper suggests that the threshold below which development will not be charged will be based on average build costs per square metre plus a small fixed allowance for land costs. As there is significant variation in these nationally, particularly land costs, it is suggested that a clear methodology be produced to enable more locally relevant values to be taken into account.

As set out previously all net new residential development in Surrey Heath is affected by the need to provide mitigation measures to ensure that there is no likely significant effect on the Thames Basin Heaths Special Protection Area. These mitigation measures are agreed by all affected authorities and Natural England and set out in retained South East Plan Policy NRM6 and relevant Local Plan policies. The mitigation measures require the provision of, or contribution towards Suitable Alternative Natural Greenspace (SANG) and a financial contribution towards access management and monitoring measures across the SPA. The latter is not considered to be infrastructure and is currently sought through S106 agreements.

A significant proportion of the Councils CIL income is currently required to provide for the provision of strategic SANG (i.e. SANGs that are not provided on site but are funded by a number of developments). The new process would require the Council

to be able to seek this funding separately to the Infrastructure Levy where this is not provided on site otherwise this would account for a significant proportion of the Levy.

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?

SHBC Response – *The Council would clearly support maximum value being sought to support infrastructure and affordable housing to benefit local communities, particularly as the WP suggests that there will continue to be a proportion going to local communities and that a proportion should be used towards funding planning services. However, this needs to be balanced against making development still a viable option for developers.*

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

SHBC Response – *Yes, the Council would support the ability to borrow against the Levy.*

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

SHBC Response – Yes - *Changes of use through permitted development have an equal impact on infrastructure as do applications approved through planning permissions. In Surrey Heath, all net new residential properties require mitigation measures relating to the likely impact on the Thames Basin Heaths Special Protection Area. For smaller sites not providing on site mitigation this is currently funded through CIL. The Council strongly believes that permitted development should be liable for the Infrastructure Levy.*

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

SHBC Response – Yes – *the planning system should secure at least as much affordable housing provision as at present and seek to enable the delivery of the level and tenure of affordable housing that meets local needs. The priority should be to deliver affordable housing on-site except in very exceptional circumstances. It is not clear from the White Paper whether affordable housing policies will be set centrally or at the local level. The Council considers that such policies should be set locally to take account of local evidence.*

The Council also points out that a reduction in affordable housing delivery would result in affordable housing needs not being met which in turn, could worsen local housing affordability issues, increase homelessness, and increase the number of individuals and families in temporary accommodation.

24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?

SHBC Response – *The priority should be for developers to provide affordable housing in kind on site that meets the identified local housing needs, as evidenced by locally derived evidence. of need.*

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

SHBC Response – *yes – any financial risk to the local authority should be fully mitigated.*

The Council support the proposal indicating that if the value secured through in-kind dwellings is greater than the final levy liability, the developer would have no right to reclaim overpayments.

Another proposal in the White Paper sets out, 'in the event of a market fall, the government could allow LPAs to 'flip' a proportion of affordable units back to market units which the developer can sell, if Levy liabilities are insufficient to cover the value secured through in-kind contributions.'

The Council objects to this proposed approach being used as a means to recoup losses in a market fall, as it is considered this would reduce the amount of affordable housing being delivered within the plan-making authority's area. It is the Council's view that this demonstrates a potential risk arising from the proposed removal of Section 106 agreements and their replacement by a new mechanism for delivering affordable housing in-kind, whereby the proposed approach could reduce affordable housing delivery.

24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

SHBC Response – *A mandatory minimum standard of design for affordable homes should be set including adherence to local design guidance/codes, and a mechanism for safeguarding affordable housing delivery in times of recession, where there are falling house price values.*

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

SHBC Response – *Yes, the Council would support more flexibility in spending. However, this should come with some controls to ensure that funding for affordable housing and relevant infrastructure is prioritised and protected.*

25(a). If yes, should an affordable housing 'ring-fence' be developed?

SHBC Response – *Yes – funding for affordable housing should be protected.*

Equalities Impact

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

SHBC Response - *The focus on data rather than documents and on accessing information digitally will tend to benefit the most educated, technologically able and digitally connected groups. The speeding up of the Local Plan system may restrict the time and opportunity available for local authorities to engage with hard to reach groups. Both of these factors may impact on disadvantaged groups.*

Use of CIL to fund the provision of ducting to support future CCTV and internet fibre and cabling upgrades in Camberley Town centre

Summary

Whilst the works to the town centre are underway new ducting has been provided to enable the installation of fibre and cabling when required to support the future upgrade of the CCTV and internet including 5G in the town centre thus avoiding the need to excavate the High Street and Princess Way (east) for these at a future date. It is suggested that this be funded from CIL monies collected for Town Ward.

Portfolio: Finance

Date Portfolio Holder signed off report – 5 October 2020

Wards Affected: Town

Recommendation

The Executive is advised to RECOMMEND that a capital bid for £150,000 for the funding of works to provide new ducting for CCTV and Internet cabling in Camberley town centre as part of the current public realm project be agreed.

1. Resource Implications

1.1 The capital works are to be funded from the local CIL fund for Town Ward. There are currently £228,928.17 of uncommitted funds available.

1.2

2. Key Issues

2.1 The options are to agree or not agree to the capital funding of the ducting

3. Proposals

3.1 The proposal is to agree the funding of the ducting. It has become apparent during the current works to the High Street and Princess Way (east) that the current CCTV system requires upgrading and that any future internet upgrade such as 5G would require new cabling or fibre to be installed. In order to avoid the future need to dig up the High Street new ducting is being installed so that cabling can be pulled through without any further excavation being needed. To avoid further delay to the public realm, these works have been commenced.

4. Supporting Information

4.1 The cost of the work which has been partially completed is £150,000. The works will be undertaken by the current contractors as part of the public realm project and no additional procurement is required. This

approach delivers cost savings as the pavements are being excavated as part of those works and thus the only extra cost is the purchase and installation of the ducting.

5. Corporate Objectives And Key Priorities

- 5.1 Supports the Place and Prosperity themes of the 5 Year Strategy. Helping to make Camberley a place where people enjoy and contribute to a high quality of life and a sustainable future and to sustain and promote our local economy so people can work and do business across Surrey Heath, promoting an open for business approach that attracts investment and complements our place.

6. Policy Framework

- 6.1 Supports delivery of the improvements to the public realm in and around the High Street and Princess Way (east) in accordance with the Camberley Town Centre Area Action Plan.

7. Community Safety

- 7.1 Will support future improvements to CCTV and thus community safety in Camberley Town centre.

8. PR And Marketing

- 8.1 No matters arising

Annexes	None
Background Papers	None
Author/Contact Details	Jenny Rickard – Executive Head of Regulatory jenny.rickard@surreyheath.gov.uk
Head Of Service	Jenny Rickard – Executive Head of Regulatory

Kevin Cantlon Fund Repurposing – Economic Recovery

Summary

This paper is to request the approval to repurpose the Kevin Cantlon Shop Front Improvement Fund to support the Economic Recovery post Covid-19.

Portfolio: Business & Transformation

Date Portfolio Holder consulted: 9 October 2020

Wards Affected: All

Recommendation

The Executive is asked RESOLVE that the proposed action plan to repurpose the Kevin Cantlon Shop Front Improvement Fund to support the Economic Recovery be agreed.

1. Key Issues

- 1.1 In 2017, The Council set up the Kevin Cantlon Shop Fronts improvements Schemes, allowing for businesses within the Borough with a “shop front” to apply for up to £5,000 to contribute 50% for updating their shop fronts.
- 1.2 Since the Launch of the scheme there have been 8 applications to the scheme, despite promotion across the Borough. In the 3 years of the scheme, 8 applications have been made, 7 successful totalling a grant pay out of £12,244. There is £87,756 remaining in the budget.
- 1.3 In June 2020, a paper was presented to the Executive to request to repurpose the fund to support the needs of the community post Covid-19 outbreak. Covid-19, a worldwide pandemic has made a huge negative impact on the economy across all sectors and size of business, and it is felt that this money would have greater impact if reallocated to support the Boroughs economic recovery.
- 1.4 The UK Governments Furlough Scheme is coming to an end, and it is reported that the insolvency service has been notified of over 300,000 redundancies up to July 2020.
- 1.5 On the 24th September, the Chancellor announced a further package of support to encourage employers to continue supporting the viable jobs in their businesses through the Winter Economy Plan in the Job Support Scheme which will be introduced from the 1st November and run for 6 months to enable businesses to keep workers on who are undertaking fewer hours to contribute towards their wages for the hours they are not working.

- 1.6 48% of claimants to the employment element of Universal Credit in Surrey Heath are those who are self-employed, this indicates that work is not yet picking up for these claimants, and opportunities to look at alternative options for their business, time to learn new skills and review their business plan would be welcomed alongside the support they are getting from DWP.
- 1.7 Surrey as a County has been reported to be the 4th highest increase in universal credit starts during the pandemic across the Country, and resources need to be made available to support these people get into work, and it is the aim of this action plan to support the support currently available and broaden that to appeal to all different type of people, in their various situations.
- 1.8 With this back drop it proposed that the remaining £87,756 of the KC Shop Front Scheme be repurposed to deliver a number of different initiatives to support both individuals and businesses across the Borough. The aim of the support is to appeal to different types of end users, understanding that people approach challenges in various ways, and we should not offer a one size fits all.
- 1.9 The aim is to create successful businesses within the Borough, which turn into employers of the future. Our current start up Business Survival rate is 48.4% in the first 5 years of operation, 2nd highest in Surrey, and above the regional average of 44.4%. It is our ambition to in the least keep it at this level, if not exceed this, and this will be monitored.
- 1.10 The initiatives are detailed below
- i) **Pop-up Business School Cost** – full £17,995 + VAT this would be shared with Guildford Borough Council and therefore Cost to SHBC is £8,997.50. There is no cap on the number of Surrey Heath residents who can take advantage of the 2 week programme, and they would like to aim for circa 100 people across the 2 Boroughs however this would not be capped and can support more. SHBC will work directly with the pop-up business school to market this. See Annex A for more details.

This would be aimed at pre-pre start-ups, and the course covers:

- Start without spending money
- Promoting your business
- How to make sales
- Build a great website for free
- How to use social media to sell
- Registering a business & paying tax Insurance
- Wellbeing: Motivation, confidence & mindset
- SEO & getting on Google
- How to keep customers
- Networking
- Negotiation
- Being productive & get things don

- There is the option of a one-week course which would cost £14,255 +VAT (£7,112.50)

- ii) Enterprise Business South** - This project will deliver 1-2-1 Business Health Check and Support Package to each enquirer (either an individual or small business) and this will include:
- An initial 1-2-1 diagnostic/business health check resulting in an agreed action plan
 - free business start-up toolkit
 - ongoing support by phone
 - e-mail and Zoom for a full year.

Enterprise South undertakes to record the following information against which its use of the funding provided by the Council will be measured:

- Number of businesses or prospective businesses in the Borough provided with advice
- Type of business supported
- Type of support activity
- Client postcode data
- Gender, Age, and Ethnicity where collected

This offer is open to start ups, and existing businesses and to people facing redundancy. Businesses and individuals can continue the support after that point; however this would be at their own expense.

The cost is calculated at £95 per client and only invoiced once the supporting evidence has been provided per 1/4. This would mean at a £5,000 budget would allow us to support 53 local business owners for a full year. Beyond that, they will be given the option to continue at their own expense but not be under any obligation to do so. See Annex B for further details

iii) Surrey Chambers Start-up Academy

Surrey Heath has been working with the Surrey Chambers for 4 years, providing start up clinics for individuals across the Borough and beyond.

The new Start-up Academy will provide support to and the first cohort will be supported though the current budget allocated to the Start-up clinics (£6,750 remaining in this financial year), if successful, it is envisaged that this support would be provided for a further 2 years (£7,500 per year). It is hoped that this will support upwards of 20 candidates per cohort.

The 8 monthly seminars will cover:

- Business Planning/Strategy and setting objectives
- How to make a business successful
- Branding and Website Design/Development
- Sales & Negotiation
- IT & Cyber Crime
- HR & Compliance
- Budgets & Raising Money

If this project is not successful, we would revert back to the Start-up clinics.

iv) Youth Hub – This project will be delivered in partnership with The Department of Work and Pensions (DWP) and part funded by a grant from Government. The Youth Hub will be a drop-in service for 16-24 year olds in the Borough to get career and job seeking support outside of a job centre in a more appealing and accessible environment and location for them. They will all be on universal credit, and therefore this is a positive support mechanism for supporting them getting into work and will work hand in hand with the Kickstarter project, detailed below. Economic Development is working with DWP to develop this project so that it can launch as soon as possible.

v) Other Schemes supported

- **Kickstarter** – This is a DWP scheme which SHBC will be supporting The Surrey Chambers in delivering as a representative. This scheme supports 16-24 year olds get a paid 6 month job placement with a local employer to provide important and quality work experience.
- **Camberley Jobs Club** – We will continue to work with the Camberley jobs club to support their members getting into work

1.11 £20,000 per year will be allocated to the KC Shop Fronts Scheme, providing support for independents across the Borough improve their frontages. This will allow for a minimum of 5 businesses per year receiving support, which is in line with the numbers supported per year since the projects launch.

2. Resource Implications

2.1 Budget

Total budget of £87,756

Project	2020/21	2021/22	Total Cost	People supported
Pop up Business School	£8,997.50		£8,997.50	100 (estimated)
Enterprise Business South	£5,000	£5,000	£10,000	106
Youth Hub	£7,000		£7,000	TBC*
Surrey Chambers	£7,500	£7,500	£15,000	60
Shop Front Scheme	£20,000	£20,000	£40,000	Min 8
Total	£48,497.5	£32,500	£80,997.50	266
Other (TBC)	£3,379.25	£3,379.25	£6,758.5	

- 2.2 What Success Looks like – The action plans success will be measured on the following factors:
- a. Number of people and businesses supported
Improved Business Survival Rate
 - b. Number of businesses Started during the programme
 - c. Number of Young people into employment, further education or apprenticeships
 - d. Reduction in Universal Credit Starts
- 2.3 The Economic Development team's role within the recovery will be to ensure support is provided, where and when it is needed. It will also ensure the quality of the training is evaluated before committing
- 2.4 The fixed term posts created through the Youth Hub Scheme will be managed under the Economic Development Team.
- 2.5 There would be a need for Communication and Marketing support across this programme of work.
- 2.6 There would be a requirement for HR support in the employment to the Roles for the Youth Hub.

3. Proposal

- 3.1 It is proposed that the initiatives detailed above are put in place to support economic recovery in Surrey Heath Borough this will be funded through the re-purposed KC Shop Front fund.

4. Options

- 4.1 Approve the proposed recovery initiatives
- 4.2 Part approve the proposed recovery initiatives
- 4.3 Approve the proposed recovery initiatives with additional elements

5. Corporate Objectives And Key Priorities

- 5.1 Prosperity – to sustain and promote our local economy so people can work and do business across Surrey Heath, promoting an open for business approach that attracts investment and complements our place. Allowing for this fund to be re-purposed will ensure that Economic Development are helping businesses recover, and growth to support the communities of Surrey Heath.
- 5.2 Performance – to deliver effective and efficient services and allow for support to be targeted to businesses and individuals when they need it

6. PR And Marketing

6.1 Support from the Council's Marketing & Communications team will be required.

7. Equalities Impact

7.1 Equalities impact assessments will be undertaken as each scheme is set up.

Background Papers: Annex A - Pop up business school Literature
Annex B - Example Voucher scheme – Enterprise
Business South (Waverley)

Author: Teresa Hogsbjerg – Economic Development Manager
Teresa.hogsbjerg@surreyheath.gov.uk

Executive Head of Service: Louise Livingston – Executive Head of Transformation



How can we help Councils to support large numbers into self-employment?

Q: What are the 3 biggest barriers that new & struggling business owners face when becoming self-employed?

- 1. Money***
- 2. Lack of confidence***
- 3. Not knowing what to do, how and in what order***

***This is even more true since Covid-19.**

We can help the large numbers of self-employed people struggling and people that want and need to start a business quickly.

- Help people to gain a sustainable income from self-employment
- Fresh approach, alternative to the “traditional” offer
- We can train large numbers of people and give them the practical help they need quickly to start, re-start and sustain their small business in a Covid marketplace
- Focus on helping people start and re-start without spending money and show how to avoid debt in their business
- Mindset and wellbeing addressed as well as business information
- Innovators and the UK’s leading provider of alternative business support and have a track record of delivering brilliant (and life-changing results)



We help people start & grow small businesses debt-free, by showing how they can start with little or no money.

We teach an alternative way of becoming self-employed, that gives people confidence and self belief.





We give people the information, inspiration and practical help they need to start and sustain self-employment in Covid-19 world.

Since 2012 we have trained **over 7,000 people** in our alternative method to start and grow a small business.

Our **intensive courses** help people to **focus their ideas** and take action, make money **without debt** and **change people's lives**. We have partnered with Councils, Housing Associations, Corporates and Jobcentre Plus to inspire train and **activate** new small businesses.

**We are changing the way entrepreneurship is taught so that
ANYONE can start a business debt-free**

Our results

We supported 335 people & created 122 businesses in partnership with DWP and Jobcentre Plus and these are some of the results:

Page 186

£1.2M
BENEFITS SAVINGS
per annum
from participants
starting businesses

£148
COST PER DWP
CUSTOMER

£7,374
YEARLY BENEFITS SAVINGS
PER DWP CUSTOMER
ATTENDING POPUP

£49.85
ANNUAL BENEFITS
SAVING PER £1
INVESTED

+14%
SELF-EMPLOYMENT

-21%
UNEMPLOYMENT

1 in 3

benefits claimants who
attended our event were
NO LONGER CLAIMING BENEFITS
6 months later

START-UP & SURVIVAL RATES



STARTED BUSINESSES
during and after the workshops

109
BUSINESSES
STILL TRADING

TOTAL **122** CREATED



STILL TRADING
after the PopUp Business School project

This is an alternative to the “traditional” offers & for participants who want to start a business, or who can’t find suitable employment.

Become Self-Employed

10 days intensive, 10am-3pm daily

Blended learning course:

10 days of seminars

Group coaching

Peer support

Business Survival Guide

Podcast

Online resources

Basware ITEM ID: POPSU10

What’s covered?

Start without spending money

Promoting your business

How to make sales

Build a great website for free

How to use social media to sell

Registering a business & paying tax

Insurance

Wellbeing: Motivation, confidence & mindset

SEO & getting on Google

How to keep customers

Networking

Negotiation

Being productive & get things done

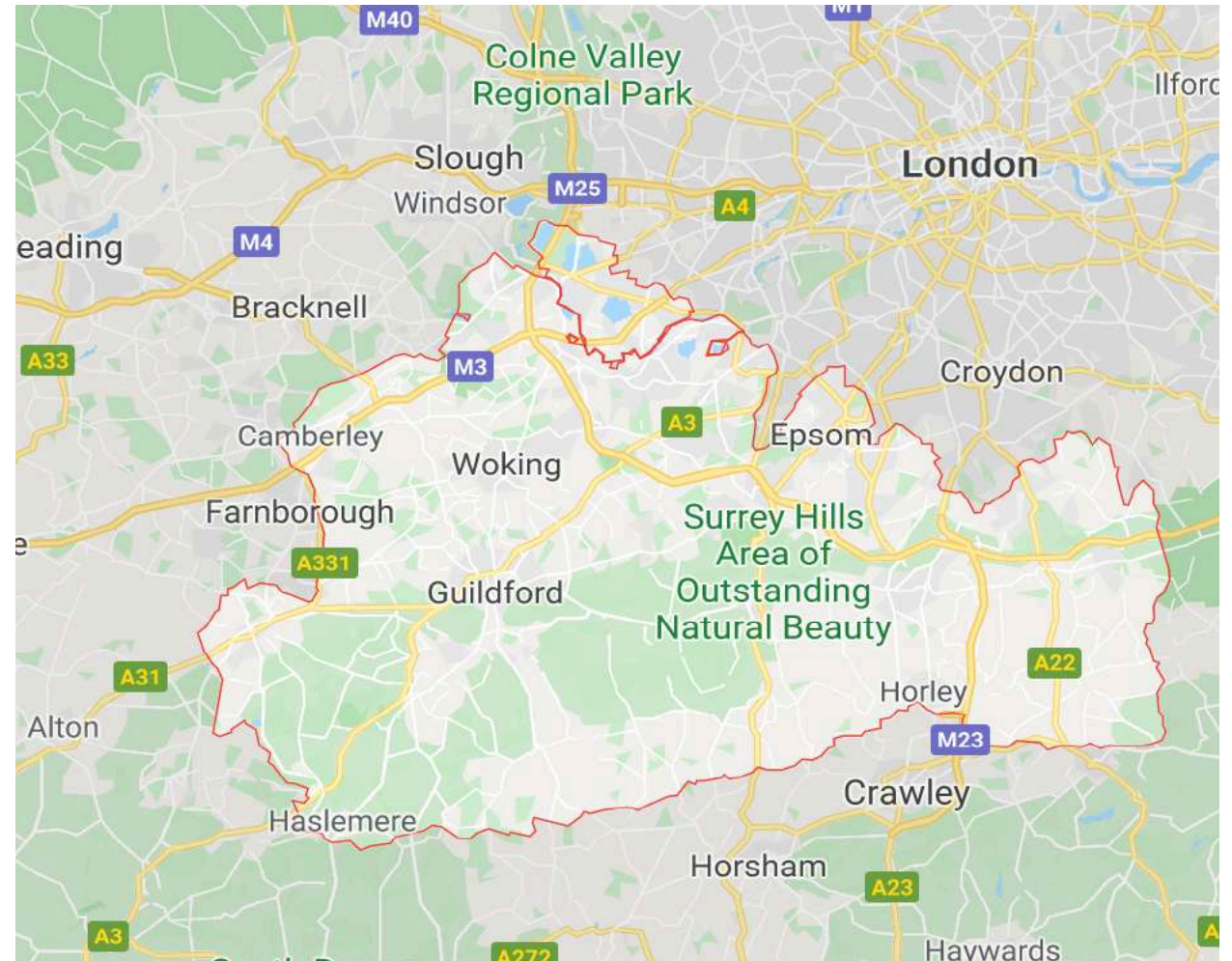
What a would a partnership look like?

Having explored running PopUp Business Schools with Guildford and Surrey Heath Councils we are proposing running a “Surrey Online PopUp Business School event” that would deliver much needed “pre-pre start” enterprise training to those who need it the most now in Surrey Heath and in Guildford.

Page 188

A collaborative event would allow partners to share the cost and create huge impact across the region with an estimated attendance of 100 people. PopUp Business School would work individually with each local authority involved three months prior to ensure they get sufficient signups. This would be a mixture of local stakeholder engagement, online advertising and local press campaigns.

The event itself would be delivered via Zoom allowing participants across districts to be able to access the event without having to travel



Costs

1. One Week Online Event

Cost: £14,225+ VAT

Costs include: Dedicated project manager, Delivery team, Marketing support, Marketing materials, Three month lead in marketing campaign, Customer registration, Impact report, Livestream webinars, Online support for attendees, Podcast, Group coaching and Peer support

Page 189

2. Two Week Online Event

Cost: £17,995+ VAT

Costs include: Dedicated project manager, Delivery team, Marketing support, Marketing materials, Three month lead in marketing campaign, Customer registration, Impact report, Livestream webinars, Online support for attendees, Podcast, Group coaching and Peer support

South and Vale District Council
Bristol City Council
Swansea Council
Leeds City Council
Camden Council
Tower Hamlets Borough Council
Bolton at Home
Cardiff Council
Newport City Council
Wrexham County Borough Council
Ealing Council
Wiltshire Council
Reading UK CIC
Flintshire County Council
Optivo
Fife Council
Doncaster Council
Slough Council
Henley Business School
Peabody

Oldham Council
Wigan Council
Vale of White Horse District Council
Bridgend County Borough Council
Barnet Council
Coastal Housing
Pobl
Westminster Council
Swale Borough Council
West Kent Housing
Red Kite Community Housing
Wates Construction
Hammerson
Dover Big Local
Royal Borough of Kensington & Chelsea
Croydon Council
Great Places
Oxford University

“

Westminster City Council chooses to work with PopUp Business School as they provide business training like no other company out there! The workshops they deliver are relevant, practical and interesting.

The team are incredibly relatable and approachable, managing to make even the most mundane topics in business engaging and inspiring, leaving participants fully motivated to start their businesses.

David Wilkins

Strategic Manager Business & Enterprise
Westminster City Council.

”



City of Westminster

Featured in:



The Daily Telegraph

realbusiness

Forbes

YAHOO!
NEWS

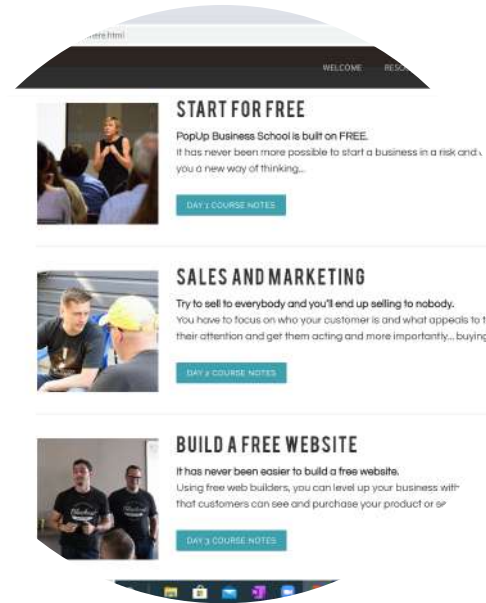
PBS
NEWS
HOUR

Some of our other resources:



Podcast

We add episodes every week to help people start and build small businesses which includes case studies, content and coaching.



Online help

The online version of our course in a series of twenty articles supports people who attend our live events by taking them step by step.



Survival Guide

Launched during the first week of lockdown our guide supports self employed people and small business owners to operate in a Covid World.

Contacts



James Headspeath
Head of Commercial Partnerships

Email:
James@popupbusinessschool.co.uk

Telephone:
07706 739178

Free Support Packages

FOR WAVERLEY BUSINESSES

ENTERPRISE
BUSINESS SOUTH

Waverley
BOROUGH COUNCIL

START-UPS



- ▶ An initial 1-2-1 introduction to running your own business
- ▶ An impartial discussion about your business idea
- ▶ Access to your own business adviser for 12 months
- ▶ A free business start-up toolkit
- ▶ Help with writing your business plan
- ▶ A free copy of 'Start Your Own Business' book
- ▶ Ongoing support by phone, e-mail and Zoom for a full year
- ▶ Access to free workshops/ masterclasses
- ▶ Monthly newsletter with relevant hints and tips, forthcoming events.
- ▶ Social media engagement and promotion
- ▶ Help with access to funding (if required)

FREE

EXISTING



- ▶ An initial 1-2-1 diagnostic/ business health check
- ▶ Feedback and an agreed action plan
- ▶ Access to your own business adviser for 12 months
- ▶ A free business toolkit and templates
- ▶ A free copy of 'Start Your Own Business' book
- ▶ Ongoing support by phone, e-mail and Zoom for a full year
- ▶ Access to free workshops/ masterclasses
- ▶ Monthly newsletter with relevant hints and tips, forthcoming events.
- ▶ Social media engagement and promotion
- ▶ Help with access to funding (if required)

FREE

REDUNDANCY



- ▶ An initial 1-2-1 to explain the reality of running a business
- ▶ A step by step guide to moving from employment to self-employment
- ▶ Access to your own business adviser for 12 months
- ▶ Help with writing your business plan
- ▶ A free business start-up toolkit
- ▶ A free copy of 'Start Your Own Business' book
- ▶ Ongoing support by phone, e-mail and Zoom for a full year
- ▶ Access to free workshops/ masterclasses
- ▶ Monthly newsletter with relevant hints and tips, forthcoming events.
- ▶ Social media engagement and promotion
- ▶ Help with access to funding (if required)

FREE

Our sole aim is to help you succeed and this service is completely free of charge as long as you either live or run a business in the local authority area.

The offer is limited to one voucher per business and must be redeemed within 30 days (see also expiry date below). The support package will last for 12 months and is subject to a fair usage policy (details available upon request). At the end of the period, you will be offered the chance to continue at your own expense but not be under any obligation to do so.

Find out
how to
claim

Free Support Packages

FOR WAVERLEY BUSINESSES

HOW TO CLAIM

To redeem this voucher please contact us either by e-mail (info@enterprisesouth.co.uk) or telephone on **0844 225 3130** (local rate call).

We will need a few simple details including your name, address, telephone number, and e-mail address. One of our experienced business advisers will then contact you to discuss your needs and to explain the process.



ENTERPRISE
BUSINESS SOUTH

ABOUT US

Enterprise South is a programme of support for pre-starts, start-ups, and existing business owners. It is run by two established not-for-profit organisations, Enterprise First and Business South. We have been supporting start-ups and existing businesses since 1981 and offer a range of support including independent advice, mentoring, practical workshops. We also manage enterprise centres providing access to light industrial and office space all on flexible terms. A member of the Cavendish Consortium and delivery partner for Virgin Start Up Loans.

MORE INFO?

Please do contact us if you would like to find out more.

info@enterprisesouth.co.uk
0844 225 3130

Annual Report on the Treasury Management Service and Actual Prudential Indicators for 2019/20

Summary

Report to advise members of the Treasury Management Service performance and to illustrate the compliance with the Prudential Indicators for 2019/20

Portfolio - Finance

Date signed off: 30 September 2020

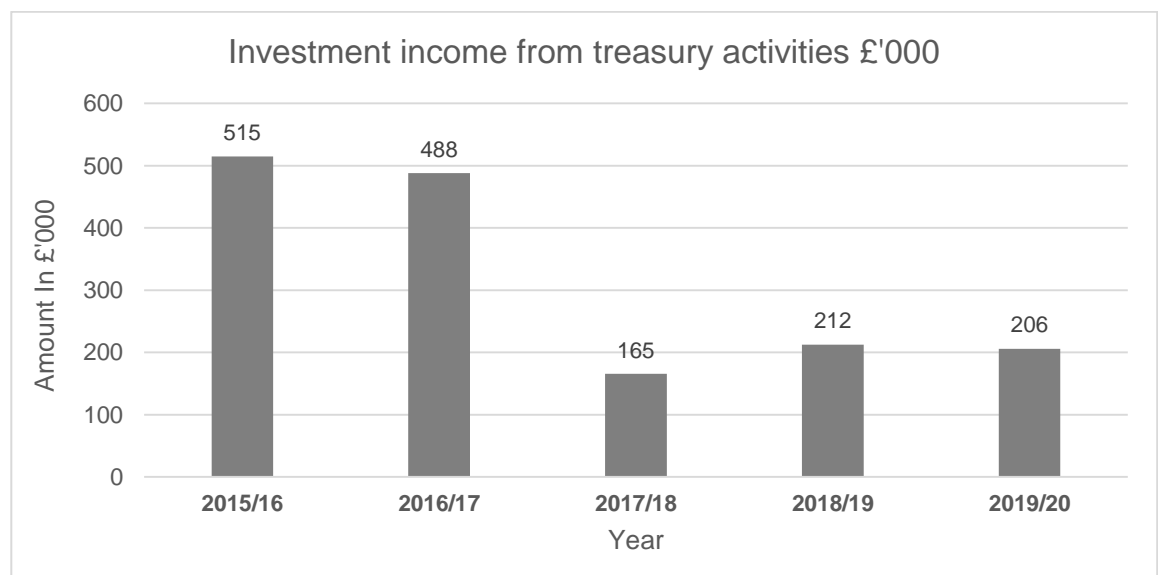
Wards Affected - All

RECOMMENDATION

The Executive is asked to RESOLVE to note the report on Treasury Management including compliance with the 2019/20 Prudential Indicators

1. Resource Implications

1.1 None directly as a result of this paper, but the Authority is heavily dependent on investment income to support its current revenue expenditure. The graph below shows investment income from treasury activities from 2015/16 to 2019/20.



1.2 Treasury income returns decreased in 2019/20 compared to the previous year partly due to the Bank of England’s decision to decrease Bank Rate from 0.75% in August 2018 to 0.10% in March 2020. Treasury income in

2019/20 was £206k which was a reduction of £6k compared to 2018/19. However the 2019/20 income was still above the budgeted income of £140k.

2. Key Issues

- 2.1 Treasury risk management at the Authority is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2017 Edition (the CIPFA Code) which requires the Authority to approve a treasury management strategy before the start of each financial year and, a semi-annual and annual treasury outturn report. This report fulfils the Authority's legal obligation under the Local Government Act 2003 to have regard to the CIPFA Code.
- 2.2 Treasury management is defined as: "The management of the organisation's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."
- 2.3 The Authority's treasury management strategy for 2019/20 was approved at a meeting on 19th February 2019. The Authority has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Authority's treasury management strategy.
- 2.4 The 2017 Prudential Code includes a requirement for local authorities to provide a Capital Strategy, a summary document approved by full Council covering capital expenditure and financing, treasury management and non-treasury investments. The Authority's Capital Strategy, complying with CIPFA's requirement, was approved by full Council on 19th February 2019.
- 2.5 This report is the annual report for the 2019/20 financial year. It includes both a summary of treasury management performance during the year as well demonstrating compliance with the 2019/20 Prudential Indicators.

3. Options

- 3.1 The Executive can endorse, amend, note or reject the recommendations made.

4. Proposals

- 4.1 It is proposed that the Executive notes the report on Treasury Management including compliance with the 2019/20 Prudential Indicators.

5. Supporting Information

Treasury Management Strategy 2019/20

- 5.1 The Authority approved the 2019/20 Treasury Management Strategy, which includes the investment strategy, at its meeting on the 19th February 2019. All treasury management activity complied with the approved treasury management strategy, the CIPFA Code of Practice and the relevant legislative provisions.

Investment Strategy 2019/20

- 5.2 The approved investment strategy for 2019/20 adopted a view to investment that sought to balance risk against return. It maintained a policy, on the advice of our treasury advisors Arlingclose, of diversifying investments including longer term investment funds which give a good return but can be more volatile. The Authority maintained its longer term investment in the CCLA Property Fund.
- 5.3 The Authority continued to use local authorities and money markets with investments being placed generally for short periods only.

Borrowing Strategy 2019/20

- 5.4 The Authority's chief objective when borrowing has been to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Authority's long-term plans change being a secondary objective.
- 5.5 The Authority uses a combination of short term borrowing from local authorities coupled with long term loans mainly from the PWLB to achieve this objective.

Other Local Authority Regulatory Changes

- 5.6 IFRS16: CIPFA/LASAAC has proposed delaying the implementation of the new IFRS16 Leases accounting standard for a further year to 2021/22.

Treasury Advisors

- 5.7 The Authority uses Arlingclose Limited as its treasury management advisors to provide advice on all aspects of treasury management including interest rate forecasts, counterparty lists and management advice. They have provided an Economic Review, counterparty update and market data by way of background information and this is included in Annex C.

Borrowing and Investment Activity in 2019/20

Borrowing Activity 2019/20

- 5.8 At 31/03/2020 the Authority's underlying need to borrow for capital purposes as measured by the Capital Financing Requirement (CFR) was £193.5m,

while usable reserves and working capital which are the underlying resources available for investment were £80.6m on an accruals basis.

- 5.9 The Authority's underlying need to borrow for capital expenditure is termed the Capital Financing Requirement (CFR). The CFR arises directly from the capital activity of the Authority and the resources applied to fund the capital spend, and represents the unfinanced element of capital expenditure.
- 5.10 At 31/03/2020, the Authority had £160.7m (£175.7m at 31 March 2019) of actual borrowing and £13.8m (£30.3m at 31 March 2019) of treasury investments. The net of borrowing and investments was £146.9m (£145.4m at 31 March 2019). This is less than the CFR of £193.5m above and working capital as the Authority is able to use "Internal borrowing" to fill this gap subject to holding a minimum short-term investment balance of £5m.
- 5.11 Working capital is money available to the Authority for its day-to-day operations and is calculated as the current assets less the current liabilities. Internal borrowing is a treasury management practice whereby an authority delays the need to borrow externally by temporarily using cash it holds for other purposes
- 5.12 A large proportion of the Authority's borrowing consisted of short term loans. This enabled the Authority to reduce borrowing costs by taking advantage of low interest rates. In 2019/20 the average interest rate on 6 month borrowing was 0.87% (2018/19 - 0.90%).
- 5.13 However, in order to manage interest rate risk, the Authority arranged in 2017/18, £50million of forward starting loans. Loan 1 which is for £25m will commence in 2020/21 at a rate of 2.853% and Loan 2 also for £25m will commence in 2021/22 at a rate of 2.908%. Both loans will be repayable over 40 years.
- 5.14 Based on the current capital programme, the Authority is predicted to have a decreasing CFR of approximately £1m over the next year.
- 5.15 In 2019/20, the Authority repaid £15m of short term borrowing. In 2018/19 the Authority took advantage of the low PWLB rates by arranging borrowing just before the financial year end. These loans were then invested and used to repay short term borrowing that became due in the first period of the financial year 2019/20. The Authority's borrowing activity is shown in the table below:

	31.03.19 Balance £m	2019/20 Movement £m	31.03.20 Balance £m	31.03.20 Rate %
Public Works Loan Board	(57)	1	(56)	2.54%
Local authorities (long term)	(1) (118)	0 14	(1) (104)	0.00% 0.87%
Total Borrowing	(176)	15	(161)	1.14%

5.16 The outturn for debt interest paid in 2019/20 was £2.3m (2018/19 - £1.6m) on an average debt portfolio of £161m (2018/19 - £175.7m).

Investment Activity 2019/20

5.17 The Authority held investments which represent income received in advance of expenditure plus balances and reserves held. During the year, the Authority's average investment balance was £13million. The CIPFA code and government guidance gives priority to security and liquidity and the Authority's aim is to achieve a yield commensurate with these principles.

5.18 The table below shows a summary of the investment activity for 2019/20:

Investment Counterparty	Balance on 01/04/19	Investments Made	Maturities/ Investments Sold	Balance on 31/03/20	Average Rate at 31st March
	£000s	£000s	£000s	£000s	%
UK Central Government					
- Short Term	27,506	197,550	(223,056)	2,000	0.48%
- Long Term	0	0	0	0	-
UK Local Authorities					
- Short Term	0	0	0	0	-
- Long Term	0	0	0	0	-
Banks, Building Societies & Other Organisations					
- Short Term	651	104,688	(104,870)	469	0.15%
- Long Term	0	0	0	0	-
AAA-rated Money Market Funds					
- Short Term Cash Equivalents	0	38,266	(29,255)	9,011	0.34%
Property Investments					
- Long Term **	2,209	0	(102)	2,106	4.23%
Total Investments	30,366	340,503	(357,282)	13,587	1.30%

***Property Investments - Long Term. The 102k partly represents the bid price adjustment at the financial year end.*

5.19 Both the CIPFA Code and government guidance require the Authority to invest its funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Authority's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.

5.20 Security of capital has remained the Authority's main investment objective. This has been maintained by following the Authority's counterparty policy as set out in its Treasury Management Strategy for 2019/20.

5.21 Investments held during the year included:

- Deposits with the Debt Management Office
- Deposits with Other Local Authorities
- Investments in AAA-rated constant and variable net asset value Money Market Funds
- Longer Term Property Fund

Credit Risk

5.22 Counterparty credit quality as measured by credit ratings is summarised below:

Date	Value Weighted Average – Credit Risk Score	Value Weighted Average – Credit Rating	Time Weighted Average – Credit Risk Score	Time Weighted Average – Credit Rating
31/03/2017	4.99	A+	3.06	AA
31/03/2018	4.42	AA-	3.65	AA-
31/03/2019	3.85	AA-	3.24	AA
31/03/2020	4.07	AA-	3.57	AA-

Scoring:

-Value weighted average reflects the credit quality of investments according to the size of the deposit

-Time weighted average reflects the credit quality of investments according to the maturity of the deposit

-AAA = highest credit quality = 1

-D = lowest credit quality = 26

-Aim = A+ or higher credit rating, with a score of 7 or lower, to reflect current investment approach with main focus on security

Budgeted Income and Outturn

5.23 £2m of the Authority's investments are held in externally managed strategic pooled property funds where short-term security and liquidity are lesser considerations, and the objectives instead are regular revenue income and long-term price stability. These funds generated an average total return of £26k (0.95%), comprising a £105k (4.23%) income return which is used to support services in year, and £78k (3.57%) of unrealised capital loss.

5.24 In a relatively short period since the onset of the COVID-19 pandemic, the global economic fallout was sharp and large. Market reaction was extreme with large falls in equities, corporate bond markets and, to some extent, real estate echoing lockdown-induced paralysis and the uncharted challenges for governments, businesses and individuals. Volatility measured by the VIX index was almost as high as during the global financial crisis of 2008/9 and evidenced in plummeting equity prices and the widening of corporate bond spreads, very close to rivalling those twelve years ago. Gilt yields fell but

credit spreads widened markedly reflecting the sharp deterioration in economic and credit conditions associated with a sudden stagnation in economies, so corporate bonds yields (comprised of the gilt yield plus the credit spread) rose and prices therefore fell.

- 5.25 The Authority is invested in property funds. The falls in the capital values of the underlying assets were reflected in the 31st March fund valuations with most funds registering negative capital returns over 12 months to March. Several March-end dividend details are awaited, but early calculations suggest that, despite decent income returns in 2019-20, these funds will post negative total return over the one-year period due to the capital component of total returns.
- 5.26 These unrealised capital losses will not have an impact on the General Fund as the Authority has elected to present changes in the funds' fair values in other comprehensive income (FVOCI).
- 5.27 Because this fund has no defined maturity date, but is available for withdrawal after a notice period, its performance and continued suitability in meeting the Authority's investment objectives is regularly reviewed. Strategic fund investments are made in the knowledge that capital values will move both up and down on months, quarters and even years; but with the confidence that over a three to five-year period total returns will exceed cash interest rates. In light of the fund's performance over the long-term and the Authority's latest cash flow forecasts, investment in this funds has been maintained.
- 5.28 In 2019/20 the Authority's budgeted investment income was £0.14m and the outturn was £0.20m. The outturn figure of £0.20m includes CCLA Property fund income of £0.11m. The balance of income was from investments in money market funds, banks and the Debt Management Office.

Externally Managed Funds

- 5.29 The Authority maintained its investment in the CCLA Property fund. The property fund which is operated on a variable net asset value (VNAV) basis offers diversification of investment risk, coupled with the services of a professional fund manager; it also offers enhanced returns over the longer term but is more volatile in the short-term. The Authority's CCLA property fund is in the distributing share class which pays out the income generated.

Non-Treasury Investments

- 5.30 The definition of investments in CIPFA's revised Treasury Management Code now covers all the financial assets of the Authority as well as other non-financial assets which the Authority holds primarily for financial return. This is replicated in the Investment Guidance issued by the Ministry of Housing, Communities and Local Government (MHCLG), in which the definition of investments is further broadened to also include all such assets

held partially for financial return. The performance of the Authority's non-treasury investments is reported separately to members twice a year.

Compliance

- 5.31 The Authority confirms that all treasury management activities undertaken during the year complied fully with the CIPFA Code of Practice and the Authority's approved Treasury Management Strategy. Compliance with specific investment limits is shown in the table below:

Investment Limits

	2019/20 Maximum	31.3.20 Actual £m	2019/20 Limit	Complied? Yes/No
Any single organisation, except the UK Government	£3m each	-	£3m each	Yes
UK Central Government	Unlimited	2.0	Unlimited	Yes
Any group of organisations under the same ownership	£3m per group	0.7	£3m per group	Yes
Any group of pooled funds under the same management	£5m per manager	2.8	£5m per manager	Yes
Money Market Funds	£10m in total	9.0	£10m in total	Yes

- 5.32 Compliance with the authorised limit and operational boundary for external debt is demonstrated in the table below:

Debt Limits

	2019/20 Maximum £m	31.3.20 Actual £m	2019/20 Operational Boundary £m	2019/20 Authorised Limit £m	Complied? Yes/No
Borrowing	185.0	160.7	185.0	190.0	Yes
Finance Leases		0.1			Yes
Total debt	185.0	160.8	185.0	190.0	

6. Corporate Objectives and Key Priorities

- 6.1 This report demonstrates how treasury management supports Key priority 2.

7. Policy Framework

- 7.1 The 2019/20 Annual Investment Strategy together with the Treasury Management Strategy was approved by Full Council on 19th February 2019. These set out the parameters under which Treasury Management operates including the Prudential Indicators.

7.2 The Authority fully complies with the requirements of the CIPFA Code of Practice on Treasury Management. The relevant criteria and constraints incorporated into the Treasury Management Policy Statement are:

- New borrowing is contained within the limits approved by the Authority, in accordance with the CIPFA Prudential Code for Capital Finance in Local Authorities, and the Authority's Prudential Indicators.
- Investments are made in accordance with the MHCLG guidance on Local Authority Investments, on the basis of the three main credit ratings agencies and as detailed in the Treasury Management Policy statement and approved schedules and practices.
- Sufficient funds are available to meet the Authority's estimated outgoings for any day.
- Investment objectives are to maximise the return to the Authority, subject to the overriding need to protect the capital sum.

8. Legal Issues

8.1 The Authority is required to comply with the Prudential Code as laid down by the Government.

9. Risk Management

9.1 The Authority regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. The key treasury risks being managed are:

- credit risk,
- liquidity risk,
- interest rate risk,
- refinancing risk, and
- operational risk

The techniques employed to manage these risks are covered in detail in the Authority's Treasury Management Practices, and include:

- robust counterparty monitoring and selection criteria,
- prudent cash flow forecasting,
- a range of exposure limits and indicators, and
- procedures designed to prevent fraud and error.

9.2 The Authority's primary objectives for the management of its investments are to give priority to the security and liquidity of its funds before seeking the best rate of return.

- 9.3 The limits applied in respect of counterparties and investments are the overall limits approved by Authority in the annual Treasury Management Strategy. However from time to time these may be tightened temporarily by the Executive Head of Finance in consultation with the Portfolio Holder for Finance to reflect increased uncertainty and increase in perceived risk in financial institutions and the economy. This will usually be at the cost of lower returns.
- 9.4 It should be noted that investment ratings provided by credit rating agencies are only a guide and do not give 100% security. There remains a risk that an institution may be unable to repay its loans whatever the credit rating.
- 9.5 The Authority measures its exposures to treasury management risks using a range of indicators as recommended by the CIPFA Code of Practice on Treasury Management.
- 9.6 The Authority is exposed to interest rate risk on its borrowings. Although steps have been taken to mitigate this risk, through the use of forward starting loans, for example, the risk still remains. However, based on advice from our Treasury Advisors, the risk is considered to be low for the current year.

Annexes	Annex A – Investments as at 31 st March 2020 Annex B - Compliance with Prudential Indicators Annex C – Economic and other background information from Arlingclose Limited.
Background Papers	CIPFA Code of Practice: Treasury Management in the Public Services – 2018 Edition Ministry of Housing, Communities and Local Government (MHCLG) - Statutory Guidance of Local Government Investments
Author/Contact Details	Nahidah Cuthbert Nahidah.cuthbert@surreyheath.gov.uk
Interim Head Of Service	Martin Hone Martin.Hone@surreyheath.gov.uk

Treasury Related Investment Balances as at 31st March 2020

Investments	Notes	Maturity Date	Average Interest Rate %	Principal £
<u>Cash and Cash Equivalents</u>				
<u>UK Central Government</u>				
Debt Management Office		17/04/2020	0.48%	2,000,000
<u>Banks</u>				
NatWest Business Reserve Account	On call		0.20%	483,147
NatWest Central Account			0.10%	183,667
<u>Money Market Funds</u>				
BlackRock			variable	311,231
CCLA Public Sector Deposit Fund			variable	700,000
Federated Investors			variable	3,000,000
Legal and General			variable	2,000,000
Aberdeen Standard			variable	3,000,000
Total Cash and Cash Equivalents				11,678,045
<u>Long Term Investments</u>				
Available for Sale				
CCLA Property Fund	Long term		4.23%	2,106,424
Total Long Term Investments				2,106,424
Total Investments				13,784,469

Compliance with Prudential Indicators

The Authority confirms compliance with its Prudential Indicators for 2019/20 which were set in February 2019.

Treasury Management Indicators

The Authority measures and manages its exposures to treasury management risks using the following indicators.

Interest Rate Exposures: This indicator is set to control the Authority's exposure to interest rate risk. The upper limits on fixed and variable rate interest rate exposures, expressed as the amount of net principal borrowed:

	31.3.20 Actual	2019/20 Limit	Complied?
Upper limit on fixed interest rate exposure	£1.4m	£3.6m	Yes
Upper limit on variable interest rate exposure	£0.7m		Yes
Total	£2.1m	£3.6m	

The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at current rates.

Security: The Authority has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

	Target	Actual	Complied?
Portfolio average credit rating	A+	AA-	Yes

Liquidity: The Authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing. The Authority also has the option to borrow on a daily basis on the open market.

	31.3.20 Actual	2019/20 Target
Total cash available within 3 months	£9m	£5m

Maturity Structure of Borrowing: This indicator is set to control the Authority's exposure to refinancing risk. The upper and lower limits on the maturity structure of fixed rate borrowing were:

	31.3.20 Actual	Upper Limit	Lower Limit
Under 12 months	67%	100%	10%
12 months and within 24 months	1%	100%	10%
24 months and within 5 years	2%	100%	10%
5 years and within 10 years	3%	100%	10%
10 years and above	27%	100%	10%

Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

Principal Sums Invested for Periods Longer than 365 days: The purpose of this indicator is to control the Authority's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end were:

	2019/20	2020/21	2021/22
Actual principal invested beyond year end	£2m	£2m	£2m
Actual	£2m	£2m	£2m
Complied	Yes	Yes	Yes

External Context provided by the Authority's Treasury Advisors, Arlingclose Limited

Economic background:

The UK's exit from the European Union and future trading arrangements, had remained one of major influences on the UK economy and sentiment during 2019/20. The 29th March 2019 Brexit deadline was extended to 12th April, then to 31st October and finally to 31st January 2020. Politics played a major role in financial markets over the period as the UK's tenuous progress negotiating its exit from the European Union together with its future trading arrangements drove volatility, particularly in foreign exchange markets. The outcome of December's General Election removed a lot of the uncertainty and looked set to provide a 'bounce' to confidence and activity.

The headline rate of UK Consumer Price Inflation fell to 1.7% y/y in February, below the Bank of England's target of 2%. Labour market data remained positive. The ILO unemployment rate was 3.9% in the three months to January 2020 while the employment rate hit a record high of 76.5%. The average annual growth rate for pay excluding bonuses was 3.1% in January 2020 and the same when bonuses were included, providing some evidence that a shortage of labour had been supporting wages.

GDP growth in Q4 2019 was reported as flat by the Office for National Statistics and service sector growth slowed and production and construction activity contracted on the back of what at the time were concerns over the impact of global trade tensions on economic activity. The annual rate of GDP growth remained below-trend at 1.1%.

Then coronavirus swiftly changed everything. COVID-19, which had first appeared in China in December 2019, started spreading across the globe causing plummeting sentiment and falls in financial markets not seen since the Global Financial Crisis as part of a flight to quality into sovereign debt and other perceived 'safe' assets.

In response to the spread of the virus and sharp increase in those infected, the government enforced lockdowns, central banks and governments around the world cut interest rates and introduced massive stimulus packages in an attempt to reduce some of the negative economic impact to domestic and global growth.

The Bank of England, which had held policy rates steady at 0.75% through most of 2019/20, moved in March to cut rates to 0.25% from 0.75% and then swiftly thereafter brought them down further to the record low of 0.1%. In conjunction with these cuts, the UK government introduced a number of measures to help businesses and households impacted by a series of ever-tightening social restrictions, culminating in pretty much the entire lockdown of the UK.

The US economy grew at an annualised rate of 2.1% in Q4 2019. After escalating trade wars and a protracted standoff, the signing of Phase 1 of the trade agreement between the US and China in January was initially positive for both economies, but

COVID-19 severely impacted sentiment and production in both countries. Against a slowing economic outlook, the US Federal Reserve began cutting rates in August. Following a series of five cuts, the largest of which were in March 2020, the Fed Funds rate fell from of 2.5% to range of 0% - 0.25%. The US government also unleashed a raft of COVID-19 related measures and support for its economy including a \$2 trillion fiscal stimulus package. With interest rates already on (or below) the floor, the European Central Bank held its base rate at 0% and deposit rate at -0.5%.

Financial markets:

Financial markets sold off sharply as the impact from the coronavirus worsened. After starting positively in 2020, the FTSE 100 fell over 30% at its worst point with stock markets in other countries seeing similar huge falls. In March sterling touch its lowest level against the dollar since 1985. The measures implemented by central banks and governments helped restore some confidence and financial markets have rebounded in recent weeks but remain extremely volatile. The flight to quality caused gilts yields to fall substantially. The 5-year benchmark falling from 0.75% in April 2019 to 0.26% on 31st March. The 10-year benchmark yield fell from 1% to 0.4%, the 20-year benchmark yield from 1.47% to 0.76% over the same period. 1-month, 3-month and 12-month bid rates averaged 0.61%, 0.72% and 0.88% respectively over the period.

Since the start of the calendar 2020, the yield on 2-year US treasuries had fallen from 1.573% to 0.20% and from 1.877% to 0.61% for 10-year treasuries. German bund yields remain negative.

Credit review:

In Q4 2019 Fitch affirmed the UK's AA sovereign rating, removed it from Rating Watch Negative (RWN) and assigned a negative outlook. Fitch then affirmed UK banks' long-term ratings, removed the RWN and assigned a stable outlook. Standard & Poor's also affirmed the UK sovereign AA rating and revised the outlook to stable from negative. The Bank of England announced its latest stress tests results for the main seven UK banking groups. All seven passed on both a common equity Tier 1 (CET1) ratio and a leverage ratio basis. Under the test scenario the banks' aggregate level of CET1 capital would remain twice their level before the 2008 financial crisis.

After remaining flat in January and February and between a range of 30-55bps, Credit Default Swap spreads rose sharply in March as the potential impact of the coronavirus on bank balance sheets gave cause for concern. Spreads declined in late March and through to mid-April but remain above their initial 2020 levels. NatWest Markets Plc (non-ringfenced) remains the highest at 128bps and National Westminster Bank Plc (ringfenced) still the lowest at 56bps. The other main UK banks are between 65bps and 123bps, with the latter being the thinly traded and volatile Santander UK CDS.

While the UK and Non-UK banks on the Arlingclose counterparty list remain in a strong and well-capitalised position, the duration advice on all these banks was cut to 35 days in mid-March.

Fitch downgraded the UK sovereign rating to AA- in March which was followed by a number of actions on UK and Non-UK banks. This included revising the outlook on all banks on the counterparty list to negative, with the exception of Barclays Bank, Rabobank, Handelsbanken and Nordea Bank which were placed on Rating Watch Negative, as well as cutting Close Brothers long-term rating to A-. Having revised their outlooks to negative, Fitch upgraded the long-term ratings on Canadian and German banks but downgraded the long-term ratings for Australian banks. HSBC Bank and HSBC UK Bank, however, had their long-term ratings increased by Fitch to AA-.

Exclusion of Press And Public

Recommendation

The Executive is advised to RESOLVE that, under Regulation 4 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the public be excluded from the meeting for the following items of business on the ground that they involve the likely disclosure of exempt information as defined in the paragraphs of Part 1 of Schedule 12A of the Act, as set out below:

<u>Item</u>	<u>Paragraph(s)</u>
15 (part)	3
17	3
18	3
19	3

This page is intentionally left blank

By virtue of
Regulation 21(1)(A) of the Local Authorities (Executive
Arrangements) (Access to Information) (England)
Regulations 2000.

Document is Restricted

This page is intentionally left blank

By virtue of
Regulation 21(1)(A) of the Local Authorities (Executive
Arrangements) (Access to Information) (England)
Regulations 2000.

Document is Restricted

This page is intentionally left blank

By virtue of
Regulation 21(1)(A) of the Local Authorities (Executive
Arrangements) (Access to Information) (England)
Regulations 2000.

Document is Restricted

This page is intentionally left blank

By virtue of
Regulation 21(1)(A) of the Local Authorities (Executive
Arrangements) (Access to Information) (England)
Regulations 2000.

Document is Restricted

This page is intentionally left blank

By virtue of
Regulation 21(1)(A) of the Local Authorities (Executive
Arrangements) (Access to Information) (England)
Regulations 2000.

Document is Restricted

This page is intentionally left blank

By virtue of
Regulation 21(1)(A) of the Local Authorities (Executive
Arrangements) (Access to Information) (England)
Regulations 2000.

Document is Restricted

This page is intentionally left blank